

**TATA STEEL**



## **Annual Report and Accounts 2024–2025**



# About this report

**This Annual Report and Accounts gives an overview of the financial and sustainability performance of Tata Steel Nederland B.V. (TSN) and its subsidiary companies during the financial year 2024–2025. This report integrates the financial and sustainability reports that were previously published separately.**

## Reporting period and frequency

This report covers TSN's financial year 2025, running from 1 April 2024 to 31 March 2025. Affairs from before or after this reporting period are also included when necessary or important to fully understand TSN's activities.

## Sustainability reporting

We have prepared the financial year 2024–2025 sustainability statement in this report according to own reporting principles based on the current European Union (EU) European Sustainability Reporting Standards (ESRS), to prepare for future Corporate Sustainability Reporting Directive (CSRD) compliance. TSN aims to be internally compliant by financial year 2025–2026 and will likely be required to report in compliance with the CSRD (in force since 5 January 2023) from the financial year 2027–2028 onwards.

## Assurance and presentation

The external auditor, PricewaterhouseCoopers Accountants N.V., has audited the financial statements for 2024-2025 and issued an unqualified auditor's report. The members of TSN's Board of Management and Supervisory Board, after discussion with the external auditor, have approved these financial statements.

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# REPORT OF THE BOARD OF MANAGEMENT

## Message from the CEO

2024–2025 was a difficult year for Tata Steel Nederland (TSN). The high influx of steel into the European Union from third countries, including China, resulted in a low market spread. In addition, challenging demand conditions in Europe, escalating energy costs and increases in our other operating costs impacted our performance, leading to another loss-making year for TSN.

We also faced challenges with regard to our environmental performance. During the year, several enforcement measures were imposed on the IJmuiden site. These included two orders under penalty with a maximum amount of €27 million, to end exceedance of, and remain below, the emission thresholds for certain substances (MVP1 and MVP2) at our coke and gas plants 1 and 2 (CGP1 and CGP2), as well as a notice on alleged non-compliances at CGP2. Meanwhile, public expectations are changing. Society is calling on us not to limit our environmental efforts to compliance with the applicable legislation, but to take more far-reaching measures.

To face the challenging market and step up our environmental performance, a major transformation and organisational reset of TSN is needed. Our objectives are to return TSN to profitability and competitiveness and to change the company's culture to being proactive and taking responsibility with regard to the environment. To realise this, we are carrying out a transformation programme aimed at changing our organisational setup to a smaller and more centrally led organisation, which will be more effective and have stronger execution power. Within this new organisational set-up, our Health, Safety, Security and Environment department, which is responsible for TSN's environmental and safety policy, is being strengthened. Moreover, we have established a dedicated Risk and Compliance department which monitors compliance with applicable laws and regulations and which is being led by an externally recruited seasoned Risk and Compliance Officer. Alongside this, we will roll out a cultural change programme across our entire organisation, to increase proactivity and responsibility with regard to the environment.

Protecting the interests and future of TSN requires us to reduce our cost base, in turn meaning that a significant headcount reduction is unavoidable. We recognise the impact of these job losses on our employees and their families and we are committed to working closely with all stakeholders during these difficult times. In line with the new organisational set-up, the Board of Management has been reduced from five to four members. As of 1 July 2025, the Board of Management consists of the Chief Executive Officer, Chief Financial Officer and two newly created positions: Chief Operations Officer and Chief Commercial Officer.

As part of the organisational reset, we intensified our emission measurement programme, not only to verify that we operate within applicable emissions thresholds but also to support us in improving our environmental performance. In addition, we publish our annual



environmental report (eMJV) on our website, ensuring transparency in our reporting. We are preparing to have the complaints procedure for local residents reviewed by an external party, with the outcome to be shared with these residents as well as with the Province of North Holland and the local Environmental Agency.

Improving our financial results and environmental performance is also key to realising our Green Steel Plan, as is obtaining financial support from both the Dutch government and our shareholder Tata Steel Ltd. During the year, we participated in constructive (ongoing) discussions with the Dutch government, our shareholder and other stakeholders on the first phase of our plan, which involves replacing Blast Furnace 6 and CGP2 with a direct reduction plant and electric arc furnace in order to reduce our CO<sub>2</sub> emissions by 40%. In addition, we are planning to invest in additional measures to further improve the living environment around our IJmuiden site, including measures to cover our raw materials, which will further reduce fine dust, nitrogen oxides, noise and odour.

We are convinced that all these measures will lead to a healthy, proactive and future-proof company – one that produces green steel in a cleaner living environment. We are committed to ensuring that TSN continues to play a vital role in our region and in our country, as an employer, an innovator and a good neighbour.

I would like to thank all our customers, suppliers, employees and other stakeholders for their commitment and collaboration during this challenging year. Especially under these circumstances, we are grateful for your dedication, hard work and care for our company.

**Hans van den Berg**

Chief Executive Officer and Chair of the Board of Management  
Tata Steel Nederland



# ABOUT TATA STEEL NEDERLAND



TSN is one of the major steel producers within mainland Europe, with 12,363 employees as of 31 March 2025. Our company produced 6.7 million tonnes of liquid steel in the financial year ended 31 March 2025 and had a turnover of €6.3 billion. With 20 production sites in 10 countries, our company supplies high-quality steel and steel products to customers located mainly in Europe and partly in the United States of America (USA).

## PERFORMANCE IN NUMBERS

REPORTING YEAR 2024-2025

**Total steel production**  
**6.7 million**  
tonnes liquid steel

**Gross revenue**  
**€6.3 billion**

**Investment in  
installations**  
**€244 million**

**Total direct jobs**  
As per year end  
**12,353**



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[www.tatasteelnederland.com/en](http://www.tatasteelnederland.com/en)



# Reliable producer of high-quality steel

**Tata Steel Nederland (TSN) is one of the major steel producers in mainland Europe, with approximately 12,000 employees. We supply high-quality steel and steel products to customers, most of whom are located in Europe, with some in the USA. The majority of these customers are in the construction, automotive, packaging and mechanical engineering industries, but we also serve customers in industries that are key to the energy transition, such as solar panels and wind turbines.**

TSN is located in IJmuiden, the Netherlands, and is a wholly owned subsidiary of Tata Steel Netherlands Holdings B.V., a private limited company based in the Netherlands. Tata Steel Netherlands Holdings B.V. is owned by Tata Steel Europe Limited, a United Kingdom (UK)-based private limited company. The ultimate parent company is Tata Steel Limited (TSL), an India-based public limited company with shares listed on BSE Limited (formerly known as Bombay Stock Exchange Limited) in Mumbai and the National Stock Exchange of India, and with global certificates listed on the London and Luxembourg stock exchanges. TSL is part of the Tata Group.

TSN consists of two business units: Tata Steel IJmuiden, an integrated steel plant at a unique location in IJmuiden (the Netherlands), and Tata Steel Downstream Europe, which is formed by a group of steel processing companies in mainland Europe (the Netherlands, Belgium, Germany, France, Sweden, Finland, Switzerland and Spain) and the USA.

## Tata Steel IJmuiden

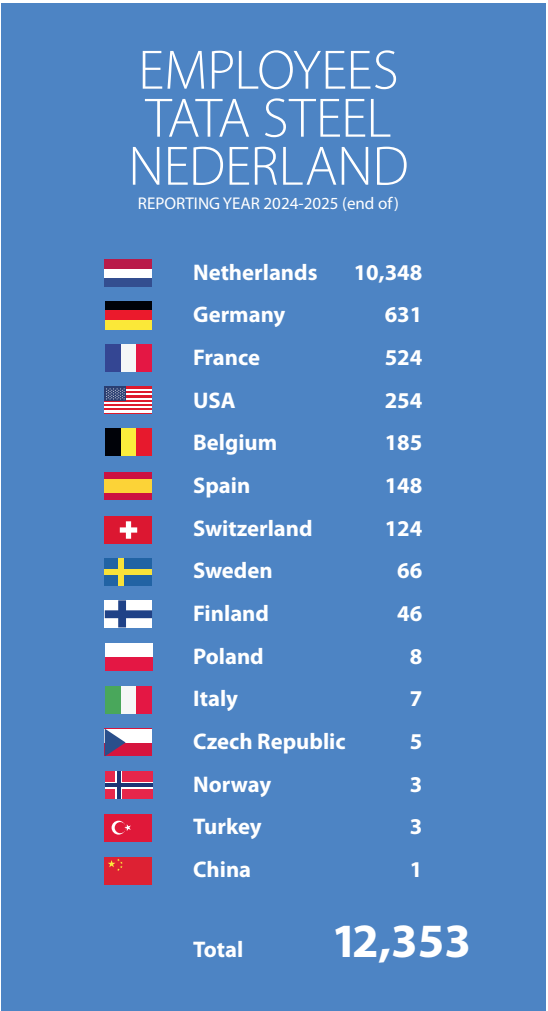
Tata Steel IJmuiden (TSIJ) is our main site, containing TSN's integrated steel operation in the IJmond region of the Netherlands. It produces many varieties of high-quality hot and cold rolled steel and coated steel and employs three-quarters of TSN's total workforce.

These operations are located on the largest continuous industrial estate in the Netherlands, which is part of the municipalities of Heemskerk, Beverwijk and Velsen. Strategically positioned on the coast, TSIJ receives most of its raw materials via its deep-sea port. The products we make in the IJmond region reach the market either directly from our location in IJmuiden or indirectly via processing locations and a network of distribution hubs, via rail, road and water.

## Tata Steel Downstream Europe

The main site is complemented by the 20 sites of Tata Steel Downstream Europe (TSDE), where steel made at the IJmuiden site is further processed. TSDE is divided into five business units: Building Systems, Colors, Distribution, Plating and Tubes. These business units process the steel from IJmuiden, ready for high-quality applications in specific market segments such as construction (metal roofs and wall cladding), the mobility sector and the energy sector (batteries).

TSN offers a wide range of strip steel products, solutions and associated services. Our main product categories are hot rolled, direct rolled, cold rolled, metallic coated, organic coated, packaging steels, electrical steels, electro-plated, building products, welded tubes and semis.



## Production sites Tata Steel Nederland





# Our purpose, mission and vision

**At TSN, we are dedicated to our purpose of making sustainable steel to improve the way people around the world work, live and move. We take pride in providing high-quality steel that is essential for high-end applications and products, in a range of industries in the Netherlands, across Europe and around the world.**

Moreover, we aim to further improve our environmental performance and adopt more sustainable, circular practices. We are actively working towards these goals, aiming to realise our vision of becoming a cleaner, green and circular steel company. Our focus on innovation and sustainability is geared towards enabling us to transform the way steel is produced, reducing our CO<sub>2</sub> footprint while increasing efficiency. In doing so, our mission is to create sustainable value, be a good employer and engage in dialogues with all our stakeholders.

**Purpose**  
Where we are headed

With our sustainable steel, we improve the way people around the world work, live and move.

**Mission**  
The route we follow

We continue to play a significant role for all our stakeholders by creating value as a cleaner, green and circular company, by being a good employer and by maintaining dialogues with all our stakeholders.

**Vision**  
What we will find at the end of our journey

A cleaner, green and circular steel company.





# Our strategy

**TSN’s strategy drives progress on issues that are relevant to our business and important for the open and transparent reporting and dialogue we seek with our stakeholders. Having introduced this strategy in 2023, in 2024–2025 we focused on building on all four of its foundational pillars, as described below.**

## Customer and value

We recognise that long-term profitability is important to being able to deliver on our sustainability goals. We achieve this through customer loyalty, high-quality products and services, innovation and close collaboration in the field of research and development (R&D). Together with our customers, we develop new steel products that are intended to help them to achieve their sustainability goals and to improve the sustainability of their value chain.

## Environment and community

We continuously strive to minimise our impact on the local and global environment. We are in constant dialogue with local residents, regional and national governments, suppliers and other stakeholders about developments on our IJmuiden site and their impact on the surrounding community. In the IJmond region, we participate in local partnerships, support local initiatives and involve our neighbours in our activities as much as possible. To further reduce the impact of our IJmond operations on our immediate neighbourhood, we launched our improvement programme, Roadmap, in 2019. We are now building on these improvements and setting ambitious goals for the coming years. As well as taking additional measures and making further investments, we are accelerating the pace of our environmental projects, which include a new deNOx installation at our pelletising plant scheduled for 2025.

## Decarbonisation

We endorse the goals of the Paris Climate Agreement as well as the climate goals of the Dutch government and consider it our responsibility to contribute to achieving them. In addition, TSN aims to achieve net-zero CO<sub>2</sub> emissions for Scope 1 and 2 by 2045, aligning with the Tata Group’s climate targets and the Paris Agreement. TSN has not yet defined an emissions reduction plan for Scope 3 emissions.

At the foundation of our decarbonisation journey is our Green Steel Plan. The Green Steel Plan is a first step in our aim to produce low-CO<sub>2</sub> steel with a lower environmental footprint. The plan involves

two phases, each removing one blast furnace (BF) and coke and gas plant (CGP) and replacing these with a direct reduction plant (DRP), which, combined with an electric arc furnace (EAF) will produce liquid steel using natural gas or green hydrogen when sufficiently available at a competitive price. By adopting new technologies and processes as well as cleaner energy sources, we aim to minimise our reliance on coal. This will in turn reduce emissions of pollutants such as NO<sub>x</sub>, SO<sub>x</sub> and particulate matter from our TSIJ operations.

In addition to the transition to green steel, we intend to take additional measures to further improve the living environment and to record this in the customised agreements. An important and visible measure is the covering of a large part of our raw material storage. This is a measure that, together with other measures, is expected to result in a reduction of particulate matter, nitrogen and nuisance (odour, noise and dust). We have based these measures on the reports of the RIVM.

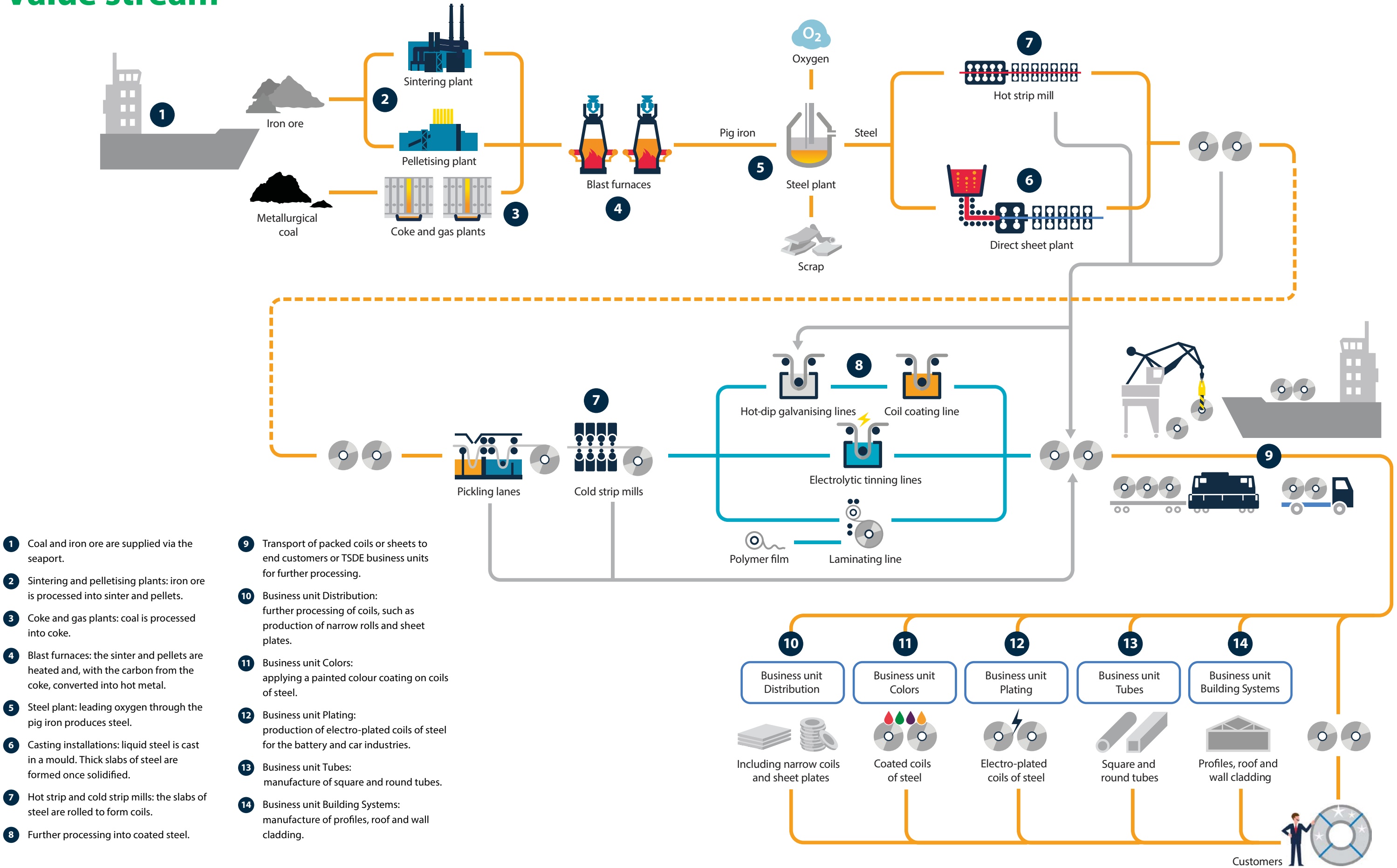
For more information, go to the “Climate change” section in the sustainability statement.

## People and society

We employ more than 12,000 people across Europe, the majority of whom work at TSN’s integrated site in the IJmond region. We are committed to the health, mental well-being and employability of all employees. Safety at work is our highest priority and is discussed regularly at every level of our organisation. We also aim to be an equal-opportunity work environment and invest in the training and development of all our colleagues, whether employed directly or otherwise associated with us. We are particularly proud of our company school, the Tata Steel Academy, which has provided a technical education to tens of thousands of young people since it was established in 1939 and remains a well-respected training and development centre in the IJmond. For more information, go to the “Own people” section in the sustainability statement.



# Value stream





# Sustainability embedded, engaged and transparent

We recognise the increasing importance of sustainability for our company and society. We contribute to the transition by working towards our vision of becoming a cleaner, green and circular steel company that is sustainable. As a matter of principle, we believe that our sustainable development must be accountable: embedded, engaged and transparent.

### Embedded

Available sustainability goals are embedded in our policies, management systems and communications. This makes everyone at TSN, from factory level to central management, responsible for our sustainable success.

### Engaged

We encourage all stakeholders throughout the supply chain to commit to sustainability and to work with us on related topics. We listen to feedback and take this into account in our decision-making.

### Transparent

Our decisions are based on science and facts. We use standardised and verifiable statistics and follow generally accepted standards, guidelines and indicators. We communicate openly about our sustainability performance so that third parties can review and assess it.

# Stakeholder engagement

TSN is committed to active dialogue with its stakeholders. This is important first in determining which topics are valuable to our stakeholders, listening to their concerns and trying to address these in order to gain support for our plans to improve our operations and our sustainability ambitions as described in our Green Steel Plan. We monitor and analyse stakeholders’ perceptions of our company on a regular basis, discuss these in a stakeholder management steering committee (in which the TSN Board is represented together with other management functions) and define corrective actions if and where needed.

## Key stakeholders and topics

Based on this analysis and realising that societal expectations are rapidly increasing, we recognise the need to adapt and we will step up our efforts to adequately respond in order to maintain the support of our key stakeholders. Of particular relevance are the IJmuiden site’s environmental performance monitored by the Environmental Agency of the North Sea Canal Area (NZKG), the reduction of CO<sub>2</sub> emissions in light of climate change and addressing the increasing concerns in the IJmond as well as the Netherlands related to health.

In this regard, during the financial year 2024–2025 several legal measures were imposed on TSIJ, including orders under penalty related to our coke and gas plants (CGPs) and a notice on alleged non-compliance regarding the state of maintenance of the CGP2. Additionally, our company was often the subject of regional and national debate, for instance with regard to the application of steel slag. As mentioned above, the attention to the health effects of economic activities in general and of TSN in particular is increasing in the Netherlands. In 2024, this was underlined by the publication of two reports by the Expertgroep Gezondheid IJmond (IJmond Health Expert Group), commissioned by the Dutch Ministry of Infrastructure and Water Management, which proposed making health effect reports (Gezondheids Effect Rapportage; GER) mandatory. The Expert Group might issue a further report in 2025.

TSN aims to maintain engagement on these and other topics with all its stakeholders. These include local residents in the IJmond region, customers, employees, the Dutch government, regional and local authorities, the regional Environmental Agency, our parent company TSL, trade unions, customers, suppliers, media, activist groups, non-governmental organisations (NGOs) and many others. We continued to engage with our stakeholders in various ways throughout the year and will continue doing so in the future.

## Exposure and accessibility

TSN communicates through various channels that are easily accessible to stakeholders, especially those in the immediate vicinity of our operations. These include the [www.tatasteelnederland.com](http://www.tatasteelnederland.com) website, our social media channels, our Staal & IJmond community newspaper (circulation 75,000) and our digital newsletter for the IJmond region, RondonStaal (All About Steel).

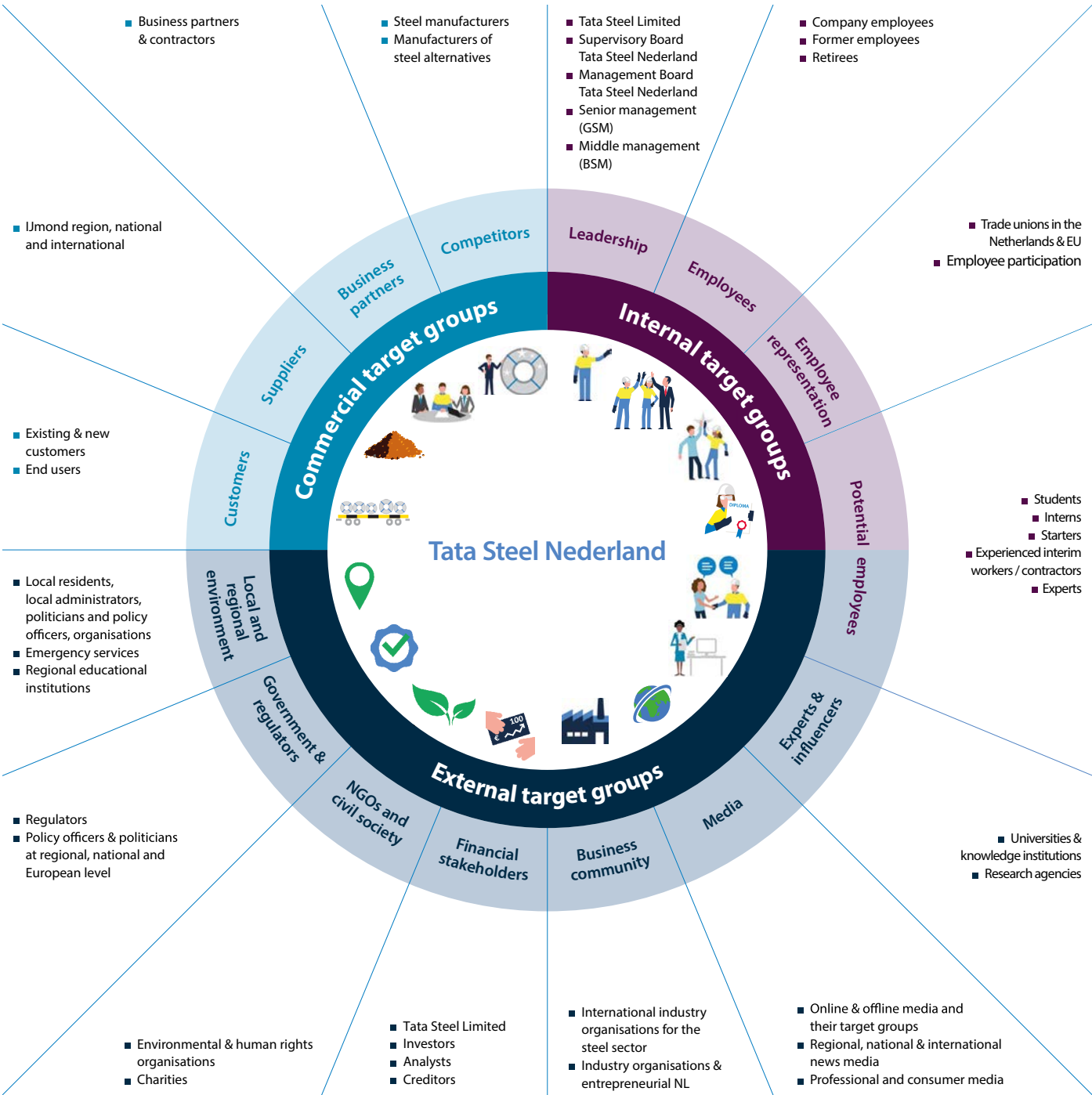
## Community partnership

In line with the DNA of the Tata Group, we aim to contribute positively to the quality of life in the IJmond region. We consider it our corporate responsibility to actively support local initiatives through sponsorships and donations. The starting point for our policy is active community partnerships.

In IJmuiden, our flagship partner programme is the Telstar football club (both men’s and women’s teams). We also organise the world-famous Tata Steel Chess Tournament for professional and amateur chess players; 2025 saw the 86th edition of the tournament take place, attracting more than 16,000 visitors over two weeks at the beginning of the year. These initiatives are reviewed annually by an internal steering committee and through evaluation with key community stakeholders.

In addition, TSN applies a donation policy to support local activities. To be eligible, activities must align with our ‘Future generations’ theme, meaning they make a positive contribution to health and well-being, education and/or the environment. We grant donations to those initiatives that have the broadest and most sustainable impact on the region. Requests are assessed on a quarterly basis by a Community Committee consisting of TSN employees, former employees and people from outside the company.

Overview of the main stakeholders of Tata Steel Nederland



Dialogue with the community

We have intensified our contact with local residents over time. Next to listening to our neighbours we aim to inform and involve them in developments on our IJmuiden site at an early stage. We balance our attention and monitor environmental, social and governance (ESG) aspects as well as economic performance. At regular roundtable sessions with representatives of local and district councils, as well as specific ones for residents from the IJmond region, we discuss recent and future developments at our company, address concerns and answer questions from our neighbours.

During all stages of the development of our Green Steel Plan, stakeholders are invited to express their opinions and give feedback. This stakeholder dialogue takes place in a variety of ways, including formal and informal meetings, participation meetings, live online sessions, interviews, surveys and desktop research. Members of the public can also drop into our service desk in Wijk aan Zee, open three days a week. We assess the information we collect from these stakeholder dialogues to determine the impact and importance of a range of topics.

In 2024, more than 13,000 people – including local residents, customers, suppliers, new employees, politicians, media, family members and other interested parties – were given site tours, hosted by our IJmuiden Visits team. We also invited activist groups to customised site visits where they could experience our operations and learn about the progress made on our Roadmap programme.

Engagement with government

We frequently engage with regional, national and European governments and authorities at various levels and with other civil society stakeholders, such as NGOs, to ensure we stay informed about public policies and regulations relevant to our business. The objective is to help create the right conditions for a sustainable steel industry in the Netherlands, where policies are adopted that ensure a level playing field within Europe and with international competitors. These conditions include a competitive cost base and attractive conditions for innovation and investment, such as energy prices, taxation, CO<sub>2</sub> pricing, carbon leakage, public procurement and international trade.

Employee representation and industry relations

We believe that proper employee participation at all levels of our organisation is important and in the interest of both our employees and our company. At TSIJ, works councils play a role in consultations within their own work-specific units. Within TSDE, the interests of employees are represented by separate works councils, which includes consultation between the Managing Director and the employee representatives. The works councils appoint members to the Central Works Council, which supports all TSDE works councils. Consultations with the trade unions on employment terms are held regularly. Central consultations are held at TSN level.



# MAIN DEVELOPMENTS



**In 2024–2025, TSIJ resumed liquid steel production volumes near full capacity, at 6.75 MTPA, after the relining of Blast Furnace 6 impacted production volumes in the previous year. The continued economic downturn in the EU, however, heavily impacted steel demand. In addition, rising imports from countries outside the EU, particularly China, put steel prices under pressure, while high costs for energy and CO<sub>2</sub> also impacted margins. TSN's EBITDA for the financial year 2024–2025 was €93 million and its operating result was a loss of €204 million.**

In September 2024, we announced a €60 million cost-cutting programme. Since further market deterioration meant the results from this programme were not sufficient, we initiated a major transformation programme in April 2025 to save costs and increase productivity, targeting additional structural improvements of €500 million as soon as possible. These improvements are essential to bring TSN back to profitability, restore our competitiveness and improve TSN's long term viability.

The transformation programme is intended to lay the foundation for strong financial performance and operational excellence at TSN. It covers multiple areas including volume maximisation, product mix improvement and employee productivity. We regret that, as part of the transformation programme, a substantial number of job losses cannot be avoided. While we recognise the impact this has on our employees and their families, we consider the transformation measures are needed in the interest of the future of our company and to help us make the investments we need in order to be able to transition to sustainable steel production.

## Decarbonisation

We are currently in discussions with the Dutch government in relation to custom support ('Maatwerkafpraak') in support of our Green Steel Plan. This integrated plan is aimed to achieve both significant decarbonisation and substantial benefits in terms of local emissions. It is also intended to result in improved health conditions for the local communities. The Ministry of Climate Policy and Green Growth carried out detailed due diligence on TSN's integrated plan and is following applicable administrative procedures in connection with the custom support that is requested. On 20 February 2025, the Ministry submitted a letter to the Dutch parliament on the progress of the negotiations, including the next steps towards a Joint Letter of Intent (JLoI) to be filed with parliament and the submission of the project to the European Commission. It is unclear whether and when we can reach agreement with the Dutch government. Obtaining this custom support is critical to realise the decarbonisation of the IJmuiden site, which in turn is essential for TSN's long-term business continuity as an integrated site and failure to get government support for the Green Steel Plan could threaten TSN's long-term viability.

In addition, permits are required for both the construction and operation of the new plants. An Environmental Impact Assessment (EIA) is required

in the permitting process. The EIA is based on an extensive study mapping out potential environmental effects of the project in advance. These studies have been conducted by Haskoning. On 20 December 2024, the draft EIA was submitted to the Environmental Agency (EA) NZKG whereafter several stakeholders provided feedback on this draft. The final version of the EIA is submitted in 2025 and made available for public review and is published on our website. The province of North Holland and EA NZKG are expected to need approximately one year to reach final decisions, which assumes all necessary documentation is available. Final decisions are expected in 2026, after which an appeals period/process might follow at the Council of State. A project decision is currently expected to become irrevocable in 2027.

## Environmental developments

### Roadmap programme

We continued to step up our efforts to further improve our environmental performance during the year. In October 2024, we completed a 1,000-metre-long and 18-metre-high windbreaker at TSIJ's premises. Together with other Roadmap programme measures, including, among others, the dedusting installation at the pellet plant and technical measures at our raw material logistics, the windbreaker is expected to contribute to a 65% reduction of dust deposition in the area surrounding the site.

### Measures imposed on CGPs

During the year, several legal measures were imposed on TSIJ. These measures included two orders under penalty with a maximum amount of €27 million for alleged non-compliance with MVP1 and MVP2 emissions thresholds at coke and gas plants (CGPs) 1 and 2, which were imposed by the Environmental Agency for the North Sea Canal Area (EA; Omgevingsdienst Noordzeekanaalgebied) on 19 December 2024. Also on 19 December 2024, the EA sent TSIJ a notice on alleged non-compliances at CGP2, for which the EA has given TSIJ a period of 12 months to remedy the alleged non-compliance, failing which the permit for CGP2 can be revoked.

TSIJ does not agree with measurement protocols applied by the EA to measure MVP1 and MVP2 emissions and has challenged the order. Notwithstanding this legal challenge, TSIJ is drafting a future-oriented plan including all improvements of the CGPs environmental



performance. We are consulting relevant stakeholders to assess whether this plan meets their expectations. In addition to the measures taken to address the alleged non-compliance, this proposed plan provides for additional measures intended to improve the environmental performance of the CGPs.

On 19 September 2022, the EA imposed a third order under penalty on the CGP1 and CGP2. TSIJ will forfeit a penalty of €100,000 upon the occurrence of a so-called green push with a maximum of 15 penalties. The EA indicated that after 15 penalties for ‘green push’ have been forfeited, it will consider revoking the permit for the CGPs. In past years, we have made a lot of progress in reducing the number of green pushes. We are pleased to report that in the year 2024 no green pushes took place. Our objective is to maintain zero green pushes. Notwithstanding this objective, we do not agree with the EA’s view that green pushes can be, or are required to be, fully prevented. On 25 April 2025, the District Court of Noord Holland ruled on this subject in favour of the EA’s position. TSIJ filed an appeal against this judgement.

As noted in note 28 to the financial statements, the outcome of the legal challenges made to the orders cannot be predicted at this point in time. If the orders are upheld by the courts and/or the permits would be revoked, this could have a materially adverse impact on our operations, results and financial position.

Since June 2023, the CGPs are subject to ‘intensified supervision’ by the EA. In response, TSIJ prepared a proactive improvement plan that was extensively discussed with the EA. In addition, TSIJ reported on and discussed progress with the EA on a monthly basis. On 3 September 2024, the EA published the results of its evaluation of its intensified supervision. The EA assessed the improvements reached by Tata Steel as positive. However, the EA also concluded that the intensified supervision would remain in effect as a number of projects were still in the execution phase. The EA planned to carry out another evaluation after April 2025. On 10 July 2025, the EA published the results of the second evaluation of its intensified supervision. The EA concluded that the intensified supervision is continued because of the ongoing enforcement procedures stemming from regular supervision (the notice and the penalty payments for emissions from battery chimneys) and as a number of projects were still in execution phase.

*Steel slag*  
The production of steel brings along steel slag. Steel slag is classified as a by-product and is used in road construction in and outside the Netherlands. The application of steel slag is subject to debate as improper handling of steel slag could result in leakage of hazardous substances. Recently, the Dutch House of Representatives asked the government to stop the application of steel slag in road construction

for the time being, until it is confirmed that the use is safe and not harmful to the environment. If the classification of steel slag, and, after decarbonisation, EAF slag, changes from by-product to waste product, the financial consequences could have a materially adverse impact on our ability to make the necessary investments for the Green Steel Plan. We are investigating alternative possibilities for processing of steel and EAF slag into a product that will address current concerns.

Business environment and prospects

**Dynamics of the business**  
The steel industry is cyclical. Financial performance is affected by general macroeconomic conditions that set the demand for steel from downstream industries, as well as by available global production capacity, raw material prices and exchange rate relativities. As integrated steel players seek to maintain high capacity utilisation, changes in margins across regions lead to changes in the geographical sales pattern. As a result, in addition to market developments in mainland Europe, changes in the global market for steel influence the financial performance of TSN.

**Macroeconomic environment<sup>1</sup>**  
Global economic growth decelerated slightly for the third consecutive year in 2024. Elevated interest rates continued to negatively impact consumption and investments. Global GDP growth increased by 2.8% (2023: 2.7%). Inflation was at 4.5%, lower than the 6.1% in 2023 but still significantly above levels seen in earlier years (2.9% in 2016-2020). In China, GDP growth slowed down to 5.0% (2023: 5.3%) as the country continued its managed macroeconomic slowdown. The weakness in the Chinese property market and domestic demand persisted throughout the year. The downturn is deepened by deflation which is caused by oversupply in various sectors. In response to the slowing economic growth and deflation, the government announced several stimulus packages. Industrial production was relatively strong at 5.3% in 2024 (2023: 4.3%) with exports supporting the economy in the absence of solid domestic demand.

The EU economic growth increased to 0.8% (2023: 0.5%). The moderate growth in the EU was helped by monetary easing by the European Central Bank which implemented a series of rate cuts (from 4.5% to 3.15%) despite persistent inflation which remained at 2.6%. Growth varied across the sectors. Whilst activity in services grew, output in manufacturing remained low due to reduced demand from the local and global markets as well as high energy costs. Growth was uneven across individual economies with industrialised countries relatively more affected by weak manufacturing. Germany experienced a mild recession with GDP growth of -0.2%, whilst France and Italy grew by 1.1% and 0.5% respectively.

**Steel demand and production**  
Global steel demand decreased by -2.2% in 2024 (2023: 0.0%) as the manufacturing and construction sectors were impacted by tight financing conditions and elevated costs. Demand in China decreased by -5.4% (2023: -3.3%) mainly due to the persistent weakness in the housing market. Demand in the EU28 decreased by -0.3% (2023: -10%). In the EU, the largest steel-using sectors were all negatively affected by the macroeconomic weakness. Output growth in the automotive sector, which had been relatively strong in previous years, also weakened. In 2024 calendar year, global steel production decreased by -0.8% to 1,834 Mt (2023: -0.2%). Steel production in China decreased by -1.5% to 1,001 Mt (2023: -0.4%) and equated to 55% of global steel production. Despite a modest growth of 2.5% in the EU, the production level remained low at 129 Mt (2023: -7.3%) as ~15% of the blast furnaces were idled in response to lower demand for steel. In recent years, crude steel output by the steel sector in the EU has declined from 161 Mt in 2017 and 153 Mt in 2021 to 129 Mt in 2024.

**Raw materials and steel prices**  
The principal raw materials used in TSN’s carbon steelmaking processes are iron ore, metallurgical coal and steel scrap. The market reference price for iron ore fines (China CFR 62%) was lower in 2024 than the previous year at US\$109/t (-\$11/t) due to low demand from China. The lowest monthly average price was reached in September with US\$94/t, whereas the highest price was recorded as US\$135/t in January. The hard coking coal spot price (Australia FOB) declined to US\$240/t (-\$56/t) as the price normalised after high prices in the second half of 2023. The German benchmark scrap price (Sorte 2/8) was relatively stable at €338/t (-€2/t) compared to the previous calendar year. The price of CO<sub>2</sub> in the EU decreased in 2024 to €65/t (-€19/t) mainly due to the limited industrial activity and a warm winter especially in the first half of the year, thereby reducing the demand for carbon allowances. The European steel spot Hot Rolled Coil price (Germany, parity point) decreased in 2024 to €626/t (-€87/t). The highest price was achieved in January 2024 at €733/t due to restocking and the disruption in the Red Sea. The steel price later moved downwards for the majority of the year due to persistent low demand, ending the year at €557/t in December.

**Trade**  
Exports from China to the rest of the world were at their highest level since 2016 at 111 Mt as domestic demand for steel in China decreased significantly, whereas the decline in production was more moderate. The high exports from China resulted in a growing amount of trade cases. In 2024, imports into the EU increased to 27.4 Mt (2023: 25.6 Mt). The higher imports led to an increase in the market share of imports from 18.6% in 2023 to 19.4% in 2024. The trend where the steel-using sectors in the EU are increasingly sourcing steel from third countries continued. Low steel prices in the EU and the existing safeguard measures helped to limit further increases of imports into the EU.

The EU remained a net importer of steel with net imports of 10.7 Mt (imports: 27.4 Mt, exports: 16.6 Mt). The region became a net importer in 2015.

**Prospects for 2025**  
In calendar year 2025, economic growth will be supported by the lowering of bank rates in the EU. However, stronger protectionism globally and potential trade conflicts are anticipated to have an adverse impact. As a result, economic growth of 1.1% in the EU is expected. Output growth in the steel-using sectors is expected to remain low in 2025 due to continued low investments due to the high interest rates. A modest recovery of 2.2% of the apparent demand for steel in the EU is forecast for 2025.

Financial review

€m	2024–2025	2023–2024
Liquid steel production (mt)	6.7	4.8
Steel deliveries (mt)	6.3	5.3
Revenue	6.273	5.943
Operating (loss) / profit	(203)	(720)
Net finance costs	(55)	(27)
Share of post-tax results of joint ventures and associates	1	4
(Loss) / profit before taxation	(257)	(743)
Taxation	53	187
(Loss) / profit after taxation	(204)	(556)

*Income statement*  
The year under review presented a challenging external environment, characterised by weak demand and low steel prices. TSN’s liquid steel production in 2024–2025 was 6.7 million tonnes (2023–2024: 4.8 million tonnes), near capacity and the highest in many years. Liquid steel production increased by 1.9 million tonnes (40%) compared to the previous year, primarily due to the Blast Furnace 6 repair programme in the prior year. During the repair, the blast furnace was idled, which temporarily reduced production capacity. Once the reline was completed and the blast furnace resumed operations, production levels significantly increased, contributing to the overall rise in liquid steel output during 2024–2025.

<sup>1</sup> Macroeconomic figures refer to the 2024 calendar year rather than TSN’s 2024–2025 reporting year.



Despite disinflationary trends and monetary easing in several countries, geopolitical risks – including trade policy uncertainty, the conflict in Ukraine and instability in the Middle East – continued to weigh on global economic sentiment. Low demand in the market and high import volumes continued to exert further downward pressure on prices in 2024-2025. Our revenue of €6,273 million was 5.6% higher than the previous year (€5,943 million), due to a 10% decrease in average revenue per tonne offset by a 17.3% increase in deliveries.

TSN's operating result in 2024–2025 was a loss of €203 million, compared to a loss of €720 million in 2023–2024. The improvement year-on-year is primarily due to an improved performance in TSIJ, with the prior period including the impact of Blast Furnace 6 being relined and therefore lower production and sales.

Ongoing geopolitical tensions, economic uncertainties and a slowdown in industrial activities are impacting the competitiveness of the steel industry. TSN focused on both operational and structural cost improvement initiatives. Accordingly, TSN announced a €60 million cost-cutting programme in September 2024, followed in April 2025 by a transformation programme targeting at least an additional €500 million of improvements. The programme encompasses multiple areas such as volume maximisation, product mix improvement, repair and maintenance centralisation and rationalisation, employee productivity and others. The aim of the programme is to sustain the company's earning capacity and return to competitiveness in the European steel context and continue our investments in the green transition. In case the programme does not yield the expected improvements, this could have a materially adverse impact on our operations, results and financial position, including the realisation of the Green Steel Plan.

The net finance cost in 2024-2025 was €55 million, €28 million higher than the previous year. This is primarily due to the higher average net debt throughout the financial year in comparison to the prior year.

Our result before taxation improved from a €743 million loss in 2023–2024 to a €257 million loss in the reporting year. Taxation was a net credit of €53 million in 2024–2025 (2023–2024: €187 million). The consolidated loss after taxation (including minority interests) amounted to €204 million in this reporting period, compared to the loss after taxation of €556 million in the prior year.

*Financing*

TSN has access to a revolving credit facility (RCF) with a maximum limit of €550 million (March 2024: €400 million). As of 31 March 2025, €310 million of this facility was drawn. An additional €150 million of loan support from parent companies was concluded in September 2024, to help absorb peaks in cash outflow if needed. This loan has been repaid as of March 2025 and replaced by the €150 million increase in the RCF. Furthermore, the company also has non-committed overdraft facilities available amounting to €68 million, which were undrawn at the end of the financial year.

Tata Steel IJmuiden B.V. and certain other subsidiaries of TSN continue to have access to a trade receivables securitisation arrangement, with a maximum amount of €600 million on a non-recourse basis. At the end of the financial year 2024–2025, €524 million of this facility had been used (prior year: €463 million).

*Cash flow*

The net cash flow from operating activities in 2024–2025 was an inflow of €408 million, a year-on-year increase of €596 million. This increase is primarily due to an improved profit after taxation and continued tight management of working capital.

Net cash flow from investment activities amounted to €279 million (prior year: €639 million) predominantly on account of property, plant and equipment capital expenditure.

There was a net inflow of €204 million (prior year: €32 million) from financing activities, mainly due to drawing from the RCF. The net movement in cash and cash equivalents amounted to an inflow of €333 million (prior year: €754 million).

*Capital expenditure*

Our capital investments in the reporting year were mostly directed towards regular sustenance capex, reducing TSN's impact on its environment and supporting the decarbonisation transition. Through the Roadmap, we aim to improve the environmental performance of the IJmuiden site. In 2024–2025, the programme took a big step forward with the completion of a windbreaker built around our raw material storage aimed to reduce dust emissions. We also made significant progress on the deNOx installation at our pellet plant, where we aim to reduce nitrogen oxide emissions by capturing NOx compounds. For further information, see the sustainability statement.

*Balance sheet and financing*

TSN's consolidated capital and reserves (including non-controlling interests) decreased by €199 million over the year to €3,001 million at the end of the reporting period. The decrease in capital and reserves was principally due to the loss after taxation of €204 million and other comprehensive income for the year of €5 million. No dividends were paid out in the reporting period (prior year: nil).

Net debt at March 31, 2025 amounted to €63 million (31 March 2024: €139 million). Cash and cash equivalents at 31 March 2025 amounted to €428 million (31 March 2024: €95 million). Further details on borrowings can be found in Note 19.

# Innovation: Investing in the future

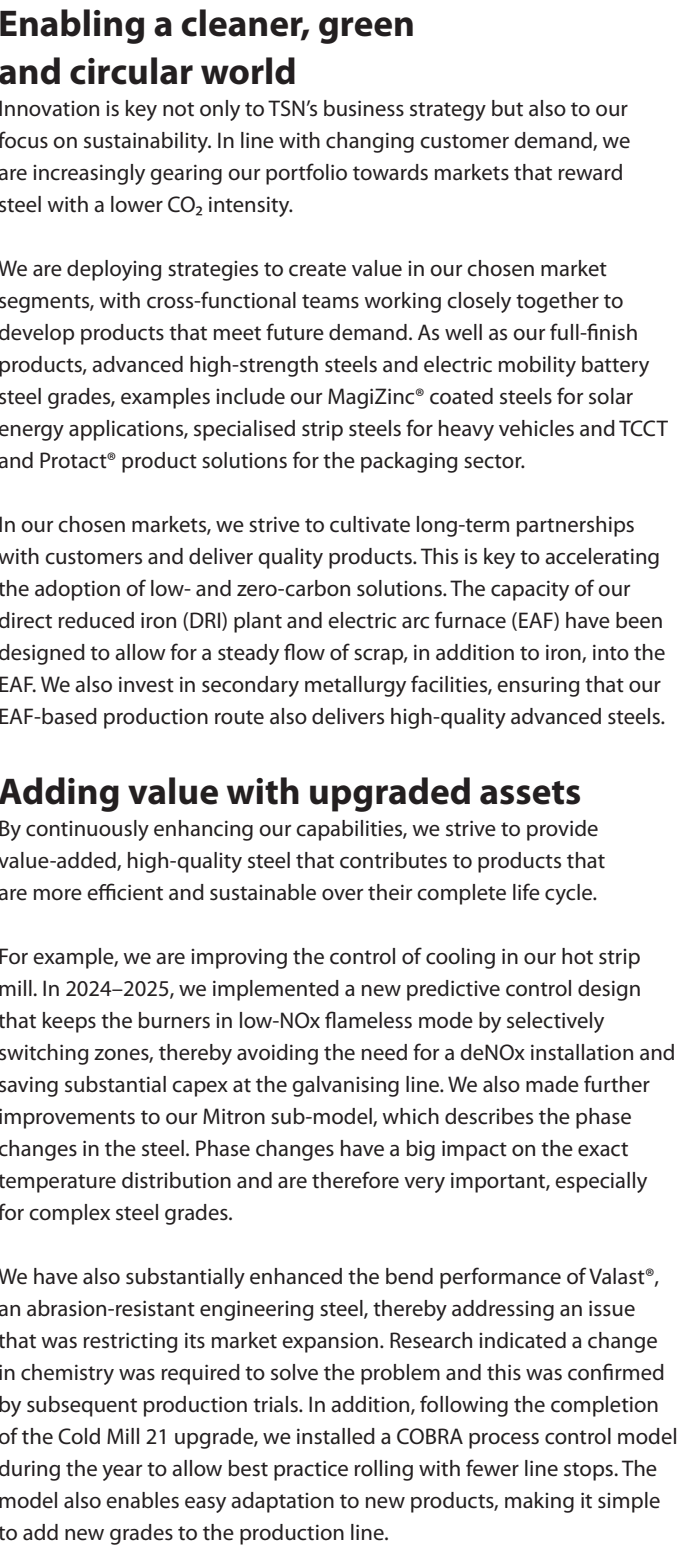
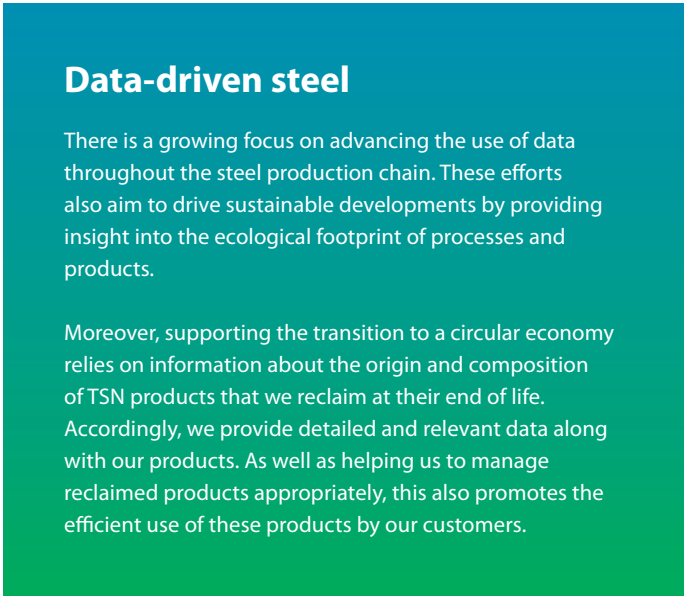
At TSN, we create value through innovation. Our research and development (R&D) department continuously supports our business units by optimising processes and ensuring consistency in the quality of our products. In 2024–2025, our innovations led to 22 process improvements, 17 new product developments and 18 newly filed patents.

Our transition to low-CO<sub>2</sub> steelmaking requires fundamental research into every aspect of the adjusted steelmaking process. A great deal of this research is carried out in close contact with the academic world through the Groeien met Groen Staal (Growing with Green Steel) programme, which intends to engage 90 PhD candidates over the next eight years to conduct research on various aspects of low-CO<sub>2</sub> steel. This cross-pollination increases the impact of our own research and gives us access to fundamental knowledge as well as the newest technological developments. This approach also promotes that our work engages with and is relevant to the society in which we operate. At the development stage, we extensively sample, test and characterise the behaviour of all our products so we can see how they can be used in the best possible way.



### Focus areas

Everyone throughout our organisation contributes, in ways big and small, to the implementation of our strategy and our journey towards cleaner, green and circular steel. In addition, TSN has 24 full-time equivalent (FTE) staff dedicated to researching decarbonisation, in collaboration with multiple partners in institutes and academia. We have also been awarded a substantial Dutch and European subsidy in support of this extension to our R&D programme, underlining the societal importance of this work. Alongside decarbonisation, we are committed to cleaner production processes with maximised scrap input, enhancing our contribution to the circular economy.





# Risk management and compliance

**Overall responsibility for risk management and compliance lies with the TSN Board of Management (BoM). As part of its responsibility, the TSN Audit Committee (AC) addresses issues relating to risk management and the internal control system, as well as the monitoring thereof.**

All businesses of TSN are subject to an increasing number of laws, regulations and commitments related to several domains like the environment, the market, business integrity and information security. TSN has policies, systems and procedures in place aimed at ensuring compliance with regulations and permits. Due to the amount of regulations as well as changed expectations of main stakeholders like regulators and society in general, the BoM decided in Q1 2025 to strengthen the Risk and Compliance function to support its business strategy. As a result the BoM has appointed a Director of Risk and Compliance for TSN as a whole, who is centralising risk and compliance related activities, strengthening the Risk and Compliance teams and building and implementing an integrated Risk and Control framework. The improvement programme is driven by international best practices, will build on what is already available within TSN and will be aligned with the Risk Management and Compliance framework of TSL.

The Risk Management and Compliance framework that is applied within TSN aims to proactively identify, assess, monitor and mitigate potential threats to the achievement of TSN's strategic and operational objectives. At the core of TSN's Risk Management and Compliance framework lies a process for identifying, assessing, monitoring and responding to risks. All businesses and supporting functions maintain a risk register which are subsequently consolidated into a company-wide risk register. We perform quarterly risk evaluations. Relevant support functions provide information on changing laws and regulations to the business, while supporting the business with assessing and implementing required changes in the business operations.

When assessing risks and changing laws and regulations, TSN takes into account the potential impact and likelihood as well as the velocity (time for impact to business). This process is required for understanding the potential consequences of each risk or new law or regulation and for prioritising mitigating actions and adequate resources accordingly. TSN uses heatmaps to visually present the identified risks, providing insights into the allocation and severity of risks across the organisation.

In 2024–2025, TSN participated in TSL's group-wide Risk Culture Survey (RCS) for the first time in order to gain broader insights into the maturity level of TSN's current risk management practices. While the RCS contributed to increased risk awareness, several actions have been formulated to further improve the risk culture within TSN. These actions will be part of the overall improvement programme on risk management and compliance.

As a result of the nature of the steel making business, historic operating procedures, increased scrutiny and developments in applicable laws and regulations, there are increased risks of instances of non-compliance and resulting enforcement and litigation risks.

## Risks

The following sections provide further detail on the risk profile for each main risk type identified.

## Environment

### Risks

Tata Steel IJmuiden B.V. (TSIJ), the affiliate of TSN located in IJmuiden, is subject to environmental permits and laws, as issued by the various authorities. Various agencies carry out (regular) investigations in the surroundings of the site, the results of which have an impact on the public opinion and the approach of the environmental agencies (EAs). In 2024, reports in relation to TSIJ were published by the Public Health Service (GGD) and the National Institute for Public Health and Environment (RIVM). In October 2024, the IJmond Health Expert Group published its second advisory report with the recommendation that the Health Effect Report (GER) should be compulsory for our Green Steel Plan and the associated custom support from the Dutch government.

Since June 2023, the coke and gas plants (CGPs) are subject to 'intensified supervision' by the EA for the NZKG. Further to this, TSIJ set up a proactive improvement plan which was extensively discussed with the EA. In addition, TSIJ reported on and discussed progress of all projects with the EA on a monthly basis. On 3 September 2024, the EA published the results of its intermediate evaluation of the intensified supervision. The EA assessed the improvements reached by TSN so far as positive. However, the EA also concluded that the intensified supervision would remain in effect as a number of projects are still in the execution phase. The EA planned to carry out another evaluation after April 2025.

In addition to the intensified supervision, the EA has issued two orders under penalty as well as a notice on alleged non-compliance in relation to the CGPs in 2024. The most relevant cases relating to the environment are further described under 'Litigation' within 'Ethics and compliance' below. On 10 July 2025, the EA published the results of the second evaluation of its intensified supervision. The EA concluded that the intensified supervision is continued because of the ongoing

enforcement procedures stemming from regular supervision (the notice and the penalty payments for emissions from battery chimneys) and as a number of projects were still in execution phase.

The status of steel slag is currently under scrutiny in the Netherlands. REACH registration of steel slag takes place at European level. If the classification of steel slag, and, after decarbonisation, EAF slag, would change from by-product to waste product, the financial consequences could significantly impact the business case for decarbonisation.

### Mitigating factors

There is a strong commitment from the BoM and SB to compliance and to minimise the impact of TSN's operations on the environment and the surrounding neighbourhoods. Dedicated resources drive improvement in TSN's environmental performance. Reducing our impact on the environment is a guiding principle for the short, medium and long term.

For TSIJ, the short-term strategy involves the Roadmap programme, which started in 2019 with the goal of reducing emissions such as dust, heavy metals, substances of very high concern, NOx, odours and noise. The programme involves significant investments both in installations and in operational measures. In 2024, the dedusting installation at the pellet plant and the windbreaker by the coal stock yard became operational. In addition to this programme, TSIJ has drafted a future-oriented plan including all improvements to the CGPs' environmental performance. This future-oriented plan provides for additional measures to improve the environmental performance, in order to responsibly operate the CGPs.

Our medium- and long-term strategy is our Green Steel Plan, where coal and cokes will be replaced by hydrogen or natural gas. The Green Steel Plan is the first step in the company's commitment to producing steel with less CO<sub>2</sub> and other emissions as specified hereafter. To address local environmental and health concerns, several extra measures are being developed which are subject to the Dutch government granting a custom support agreement. Specifically, the company is focusing on the RIVM priority areas for 2030; namely, to reduce the quantities of dust, odour, noise, and nitrogen dioxides being emitted, thereby decreasing exposure to these emissions in the surrounding area.

To mitigate the risks related to steel slag, TSIJ is researching in consultation and cooperation with various external parties possibilities for further processing of steel and EAF slag into products that will address current concerns.

As part of the strengthening of the Risk and Compliance function, the Health Safety Security and Environment department, which is responsible for TSN's environmental and safety policies, is strengthened. We also established a dedicated Risk and Compliance department which monitors compliance with applicable laws and legislation and which is being led by a new Risk and Compliance Officer.

## Climate change and decarbonisation

### Risks

#### Regulatory and carbon market risks

TSN is affected by extensive governmental policies aimed at reducing greenhouse gas emissions. The need to navigate multiple complex, overlapping regulatory frameworks will persist for some time.

The EU Emissions Trading System (ETS) stands as the cornerstone of EU climate policy. While TSN currently receives free allowances under this scheme, these allocations decrease annually. Potential volatility in carbon prices under the ETS will directly and increasingly impact the profitability of TSN.

#### Carbon leakage and global competition

EU steel producers face significant cost disadvantages compared to competitors in regions with less stringent climate policies. This also presents a risk of production shifting to such regions (carbon leakage). Current Dutch policies (such as network tariffs and the national CO<sub>2</sub> tax) create additional cost disadvantages versus European competitors. In addition, there is growing external pressure to reduce tax exemptions and discounts on coal, gas and electricity.

TSN is significantly affected by global market distortions from the import of overcapacities at highly discounted prices. While the EU's Carbon Border Adjustment Mechanism (CBAM) offers some protection, it may also compromise competitiveness for exports outside Europe.

#### Transition risks

In steelmaking, coal serves as a chemical reductor rather than a fuel, meaning that traditional efficiency improvements cannot achieve sufficient CO<sub>2</sub> reduction. Instead, complete process transformations, including new reductors (such as natural gas and hydrogen), are required.

The capital investments needed for this exceed the industry's independent financing capacity. This is evidenced by the fact that many of our competitors in the EU have received confirmation of substantial state aid for their decarbonisation efforts. Obtaining the custom support agreement is critical to realise the decarbonisation of the IJmuiden site. Without decarbonisation, TSN's long-term viability is impacted, due to EU climate policy and the increasing costs of carbon emissions.

These capital investments in decarbonisation technologies are put towards production facilities based on natural gas and hydrogen, as well as electric furnaces. These plans are critically dependent on energy infrastructure, including specific demands for natural gas during the transition phase, before this is expected to be replaced by hydrogen in the longer term. The transition to electrified production also requires reliable, affordable, low-CO<sub>2</sub> electricity, with recognised challenges in the EU and Dutch grid infrastructure posing additional risks. A further uncertainty we face during the transition period is the lack of guaranteed demand for low-CO<sub>2</sub> steel products, with the market for low-CO<sub>2</sub> steel not yet mature.

**Mitigating factors**

*Decarbonisation roadmap*

TSN has established CO<sub>2</sub> targets and is aiming for CO<sub>2</sub> neutrality by 2045. These plans also include increased use of recycled scrap metal for more circular steelmaking.

The success of this transition depends on direct government support regarding financial assistance, permit approvals and maintaining a competitive balance – a ‘level playing field’ – with other European steelmakers.

In addition, we anticipate indirect government support for, for example, developing the national energy infrastructure outside TSN's operations. TSN is actively working with authorities to realise the low-CO<sub>2</sub> steel transition. The government recognises that certain policies, such as network tariffs, are affecting TSN's competitive position and has expressed its intention to review these.

The conversations between TSN and the Dutch government are aimed at reaching a custom support agreement to replace part of our current production facilities in IJmuiden. Discussions on developing a Joint Letter of Intent (JLoI ) on this custom support agreement are ongoing. A governmental advisory committee on custom agreements for industry sustainability and the IJmond Health Expert Group will review and advise the JLoI before it is made public and further developed into a definitive and binding agreement. The EU Commission will be involved in the formal processes for state aid approval.

**Market risk**

**Risks**

*Trading in the global steel market*

Over the past few years, there has been a noticeable trend towards increased protectionism on a global scale, with countries around the world increasingly looking to protect their own economies from external threats and competition. This trend is reflected in the imposition of tariffs, safeguards, anti-dumping measures and more stringent trade regulations.

In addition, the world has witnessed a surge in instability and conflict, particularly in regions such as Ukraine and the Middle East. These conflicts have contributed to a sense of unease and uncertainty in the markets. This has been further increased by the policies of the current US administration, which has chosen tariffs as one of its main tools for either penalising or negotiating with other nations. TSN, with its longstanding presence in the US steel market, is impacted by these policies.

*Deteriorating competitiveness in the European market*

In Europe, TSN has experienced a worsening business climate over the last few years. Factors such as a sluggish economic outlook, high energy costs and the rising expenses associated with climate change requirements have posed significant challenges to TSN and the broader European steel industry's long-term competitive position. Fair trade principles and a level playing field are crucial for TSN, especially during the costly transition of decarbonising our steelmaking activities. However, with the EU being one of the few open-market economies, the persistent, largely subsidised overcapacity in China and the emerging excess capacity in Southeast Asia present an existential threat to the European steel industry. Instead of focusing on innovation and decarbonisation, the European industry is in cost-cutting mode to ensure its survival.

While the European Commission recognises the strategic importance of a European steel sector, meaningful and effective measures are urgently needed to restore a level playing field and allow the industry to transition to a zero-carbon future.

The fact that EU climate policy focuses on Scope 1 and 2 carbon emission reduction incentives adds another risk to Europe's steel industry and, therefore, to TSN. The policy requires producers to address emissions, which in turn increases their costs. The lack of policy on the demand side means that buying these green products remains optional. European steel producers therefore face the certainty of increased costs amid uncertainty regarding the market's willingness to pay for more sustainable solutions. Governments need to support the creation of lead markets in order to de-risk forward-looking investments and support Europe's ambition to become the world's first carbon-neutral continent.

**Mitigating factors**

During the reporting period, TSN maintained its strategic focus on selected market segments that value advanced steel and high service performance. New product development continued, and we added new steel offerings to our product portfolio. In addition to advanced steels, we continued to develop our sustainability offerings as part of the Zeremis® initiative, in which we invite our customers to collaborate on our joint journey towards a carbon-neutral, circular world. For more information on Zeremis®, see the chapter on climate action in our sustainability statement.

We also continued to focus on customer management, including measuring customer satisfaction and using the results to identify and act on priorities for improvement. In addition to pursuing our differentiation strategies, we deployed cost reduction measures to remain cost effective.

TSN continues to monitor import activity in terms of both volumes and prices. We also work with EUROFER (the European Steel Association) to monitor the need for additional trade defence measures to protect the European steel industry from the negative impact of dumped steel imports. In addition, TSN welcomes the continuation of EU safeguarding tariff-rate quota measures beyond the original end date of June 2024. TSN recognises the importance of CBAM – developed to put a fair price on the carbon emitted during the production of carbon-intensive goods – in ensuring a level playing field for EU steel. While we welcome the implementation of CBAM, the uncertainty around its exact functioning remains remains a concern.

TSN is currently in discussions with its North American customers to navigate the evolving US policy landscape. Simultaneously, both TSN and its customers are actively working to keep political leaders and policy makers on both sides of the Atlantic informed and encouraged to pursue a solution.

**Raw materials and supply chain**

**Risks**

TSN depends on raw material supplies that are mainly sourced from outside Europe. Geopolitical shifts continue to affect market dynamics, while harsh weather conditions at the supplying mines, including temperatures as low as -50°C during Canadian winters and cyclone seasons in Australia, could cause supply delays and consequently pose risks to the availability of raw materials. The resulting impacts on the supply chain may cause market prices to shift, with moving supply and demand balances potentially leading to higher costs or cash outflows and working capital.

Due to blast furnace closures in the UK, since the second half of the reporting year, TSN's sourcing of iron ore and coal is no longer combined with shipments for Tata Steel UK. As a result, there is less flexibility in the supply chain in case of disruption. This development also means that specific ore or coal grades are supplied in bigger parcels or shipped in smaller vessels with higher transport costs, thereby increasing our stocks and/or working capital.

Although most of our raw materials are acquired from countries with strong legal frameworks, it is essential to recognise that ESG standards differ worldwide. There is a risk that suppliers might opt to serve other countries instead of adhering to emerging and evolving European regulatory requirements that are not applied by all jurisdictions.

**Mitigating factors**

TSN sources raw materials from multiple countries across different continents, in order to optimise its operations and reduce the risk of geographical concentration and supply chain issues. Furthermore, TSN's coastal location means river droughts in Europe do not affect our raw material supply chain. We are also flexible in our use of raw materials due to having the only captive pellet plant in Europe, which allows us to conduct ongoing raw materials research. Considering the close correlation between coal and iron ore prices and steel prices, TSN employs financial instruments for commodity hedging to manage the risks associated with commodity price fluctuations.

In order to take our responsibility in the supply chain, TSN has rolled out the updated Tata Steel-wide Responsible Supply Chain Policy to ensure that suppliers across the value chain uphold ethical and sustainable practices. In 2024–2025, supplier compliance with this policy continued to improve, leading to an upgrade in rating from ‘Good’ to ‘Very Good’ under the BES6001 Standard for Responsible Sourcing.



Energy risk

Risks

TSN is experiencing significantly higher energy and CO<sub>2</sub> costs than five years ago. This is caused partly by higher market prices for energy but also by higher public energy costs; for example, network costs, CO<sub>2</sub> policies and energy tax. These higher energy costs reduce TSN's competitiveness compared to its European and non-European competitors.

Since 2021, the reduction in natural gas imports from Russia to Europe has structurally increased European natural gas prices. As natural gas is an important price setter for electricity, electricity prices in Europe are also significantly higher. Together with the costs related to the EU's ETS, these higher European energy prices represent a competitive disadvantage for energy-intensive businesses in Europe, including TSN, compared to competitors outside Europe.

In the Netherlands, this is compounded by the impact of high public energy costs compared to European competitors. The additional measures taken by the Dutch government on top of European policies are having a detrimental effect on the level playing field within Europe.

The main risks for TSN are as follows:

- 1. Compensation for indirect emissions will be available for 2025–2027, as announced by the Dutch government in April 2025, but it is unclear whether this subsidy scheme will be available after 2027. Neighbouring countries, meanwhile, have this scheme in place until 2030.
- 2. Unlike in neighbouring countries, Dutch industries do not currently receive a discount for electricity network costs. If this situation continues in the coming years, it will lead to a continued material competitive disadvantage for TSN.
- 3. The Dutch CO<sub>2</sub> levy for the industry remaining in place means that the uneven playing field persists and could even increase.
- 4. If the exemption on coal tax for dual use in the Netherlands as of 2027 is abolished as scheduled, this will impose an additional tax for TSN compared to its competitors in neighbouring countries.
- 5. It is possible that the current tax exemption for the use of electricity and natural gas in metallurgical processes may be abolished in the Netherlands in the coming years, which would further contribute to an uneven playing field for TSN.

Mitigating factors

TSN aims to reduce the impact of volatile natural gas and CO<sub>2</sub> prices through our carbon and energy price risk management strategy, which aims to hedge natural gas prices and CO<sub>2</sub> emission allowances to protect sales margins and increase cost predictability. Our exposure to electricity prices is lower, because a significant amount of our electricity demand is generated in power plants next to the IJmuiden site, using gases produced during TSN's operations.

TSN is in direct discussions with politicians, ministries and the European Commission about the challenges that we face in relation to energy policies and proposed solutions to these challenges. In addition, we address these challenges and proposals through our participation in trade organisations like the Royal Association for Energy, Environment and Water (VEMW), the enterprise association VNO-NCW and EUROFER. National steps to level the playing field regarding energy for the industry by the Dutch government would be fully in line with the Clean Industrial Deal.

Financial risk

Risks

The TSN group's main financial risks are related to the availability of sufficient funds to meet its business needs, including the ability to continue its strategic investments and meet its sustainability ambitions. Other financial risks relate to movements in interest rates, exchange rates and commodity costs.

Mitigating factors

Financial risk management at TSN is based on economic objectives and standard corporate practice. To manage this risk, the TSN group continues to focus on generating positive cash flows. However, our decarbonisation transition will require additional investments and government policies to ensure a level playing field, for which TSN is in discussion with the government for custom support and Tata Steel Limited (TSL). Derivatives and other financial instruments are used to manage any market exposures where deemed appropriate. Further details of TSN's financial risks, and the way we mitigate them, are set out in Note 21 of the Annual Accounts.

TSN's workforce

Risks

Over the past decade, the market for technical personnel has become increasingly tight. This is due to factors such as an ageing workforce, a decline in the number of students pursuing engineering or technical studies, and the decreasing popularity of vocational education. As a result, staff shortages pose a risk to TSN across all functional areas, particularly in specialised fields such as engineering and information technology (IT), where the demand for qualified personnel is high. TSN's transition will mean an additional increase in the need for engineers, apprentices and other specialists. The negative image of TSN presented in the media can discourage potential employees for considering TSN as an employer of choice.

Mitigating factors

TSN's human resources strategy is aimed at securing the right workforce to successfully operate the current assets and support the construction and future operation of decarbonisation assets. TSN is acknowledged as a strong employer, offering competitive remuneration and benefits, a secure working environment, opportunities for professional growth, and a dedicated and proud workforce. Our strategy to transition to carbon-neutral production also enhances our appeal to professionals who want to contribute to a cleaner, more sustainable world and be part of one of the largest and most advanced sustainability projects in the Netherlands.

To improve talent quality and retention, TSN continues to collaborate strategically with universities of technology and other relevant educational institutions. Talent programmes for graduates, functional trainees and apprentices are in place, along with similar efforts to recruit experienced professionals.

The Tata Steel Academy plays a key role in recruiting and training TSN employees. Through the Academy, TSN provides training programmes and vocational education for future technical and engineering staff. The Academy offers management courses, role-specific training, and vocational education. Upon completing a diploma programme, graduates are offered positions at TSN.

TSN is in the process of mitigating the risks related to the workforce reduction by means of strategic workforce planning, transparent communication, employee support programmes and careful workload redistribution.

Operational risk

Risks

Various factors such as equipment failures, natural disasters and extreme weather events could disrupt the manufacturing processes of TSN and its subsidiaries. The adverse effects of such disruptions could ripple across our operations, affecting production, supply chain and customer service levels. It is therefore imperative for TSN to proactively address these risks and implement robust contingency plans to ensure business continuity and uphold high standards of customer service, even in the face of unforeseen challenges.

Mitigating factors

In order to mitigate these risks, TSN and its subsidiaries have identified several key priorities, including applying best practices in asset management, enhancing people's technical knowledge and skills, improving process safety, carefully targeting capital expenditure and ensuring informed decision making. These priorities underscore our commitment to bolstering operational resilience and minimising the impact of potential disruptions.

Moreover, TSN is accelerating its Corporate Asset Management Framework activities, which are aimed at increasing our insight into the reliability, failure and risk profiles of our different assets. This strategic focus on asset management, supported by a risk register, serves as a proactive measure to strengthen the company's ability to navigate and mitigate operational challenges effectively.

Furthermore, in the third quarter of the financial year, workstreams within our Transformation Office began structural improvements to operations in IJmuiden. In parallel, we are undertaking a new TrueSafe programme, which represents an additional step forward in our commitment to safety, given the recent increase in safety incidents. With TrueSafe, our focus is on enhancing overall safety performance through the individual contribution of each employee. The programme aims to raise awareness about safety, building upon existing measures, and emphasises the important role that everyone at TSN plays in creating and maintaining a safe work environment.

Digital resilience

Risks

The threat of cyber-attacks from criminal organisations continued to increase during the reporting year. These organisations target major businesses across all industries, amid an ever-changing cyber environment where new threats are constantly emerging. This entails a significant increase in our business's cyber risk exposure. To manage this risk, we must constantly evolve current practices and deploy new technologies. For existing hardware and operating systems, timely maintenance and updates are required to address identified vulnerabilities.

Mitigating factors

TSN has a dedicated IT Security, Risk and Compliance department that monitors the company's IT and operational technology (OT) domain and is continuously focused on cyber risk awareness and education. Protection against viruses, malicious software and external hacking is in place and is continuously being improved. We also have rigorous contingency plans for business-critical applications and core network components. The OT domain network is compartmentalised to reduce risks and potential impact. The control of third-party access to the OT domain has been strengthened. In June 2024, TSN was certified according to the ISO 27001 framework (the international standard for information security management). This framework enables us to take a holistic approach to identifying and assessing risks in the IT landscape, across our infrastructure, network, workplace and cloud.

There has been a steady decrease in high-impact IT incidents over recent years. We achieved this by improving life-cycle management of TSN's current applications and underlying infrastructure (servers, databases and network components) and focusing on root-cause analysis to drive improvements. We also liaise with IT service providers regarding the availability of support and skills for databases and programming languages; for example, we are increasing our IT support from Tata Consulting Services and Vodafone, in both capacity and capability, to mitigate risks to business continuity.

Ethics and compliance

Risks

Like any multinational company, TSN is exposed to the following ethics and erelated risks like bribery and corruption, fraud, anti-trust, data privacy, trade sanctions and export controls.

Mitigating factors

TSN has an ethics and compliance programme in place to manage its ethics and compliance risks. A network of ethics counsellors supports the implementation of this programme across TSN.

We rolled out a refreshed Code of Conduct and Confidential Reporting Policy in the reporting year. The updated Code of Conduct is based on the current Tata Code of Conduct, with some limited changes to reflect the differing laws and regulations in TSN's jurisdictions. The refreshed Confidential Reporting Policy takes into account Directive (EU) 2029/1937 on the protection of persons who report breaches of union law, also referred to as the Whistleblower Protection Directive, and its implementation in the various EU Member States in which TSN is active. Both documents have also been communicated to TSN's external stakeholders.

TSN has a confidential reporting channel, Integrity Line, for reporting concerns around wrongdoing by or impacting TSN. This channel is operated by an independent external company, for which we refer to TSN's website.

All investigations into concerns on wrongdoing reported via the reporting channels listed in the TSN Confidential Reporting Policy, as well as any other investigations, are discussed by TSN's Compliance & Integrity Committee on a quarterly basis. These investigations are subsequently reported to the BoM and AC. The same applies to updates to our ethics and compliance programme.

Litigation

TSN and TSIJ are involved in a number of legal cases, both civil and administrative in nature, and are also subject to a criminal investigation. The most relevant of these issues both pending and potential litigation are listed below.

Pending litigation

- 1: In 2024, the EA for the North Sea Canal Area measured exceedances of emission thresholds for MVP1, MVP2 and g.O<sub>2</sub> substances at the CGP1 and CGP2 oven stacks. Further to these measurements, on 19 December 2024, the EA imposed two penalty orders with a maximum amount of €27 million on TSIJ for alleged non-compliance, requiring it to stop the exceedances and stay below emission thresholds. TSIJ does not agree with the measurement protocols applied by the EA to measure MVP1, MVP2 and g.O<sub>2</sub> emissions and has filed objections against these decisions. The Hearing and Advice Committee (HAC) heard the case in March 2025. A decision on the objections is expected over the summer. Following the decision on the objections by the HAC, the EA may amend its decision.
- 2: On 19 December 2024, the EA sent TSIJ a notice regarding alleged non-compliance at CGP2 concerning the state of maintenance of the plant, and in particular the oven walls. TSIJ has 12 months to remedy the alleged non-compliance. The EA indicated that should the non-compliance not be remedied in time, it will consider revoking the permit for CGP2. TSIJ has submitted its objections, and the case was presented before the HAC in April 2025. A decision on the objections is expected over the summer. Following the decision on the objections by the HAC, the EA may amend its decision.
- 3: In September 2022, the EA put a penalty order on the so-called green pushes – pushing coke from the oven before the coking process is fully complete – at the CGPs in IJmuiden. TSIJ submitted its objections since it is the company's opinion that, despite taking all possible measures, it is impossible to fully prevent green pushes. TSIJ also requested a permit for the green pushes, which was denied. The court hearing took place in December 2024 and the judgement was given in April 2025, whereby TSIJ's requests were denied. TSIJ appealed against the judgement. TSIJ did not receive any collection orders for green pushes that took place in 2024.
- 4: In a protracted infringement case initiated by a competitor of TSIJ, a court in Germany decided on 9 May 2023 that TSIJ had infringed on a valid German utility model as of July 2015 by selling a specific low-waviness steel grade, which may lead to a financial claim. TSIJ no longer produces or sells this specific steel grade and has appealed the court's decision that TSIJ infringed the German utility model. The appeal court took an interim decision in March 2025, whereby it ordered that expert evidence shall be taken by appointing a neutral court expert. The expert is not yet appointed.

Potential litigation

- 1: TSIJ is subject to an investigation by the Public Prosecution Office into the alleged introduction of hazardous substances that could affect public health into the soil, air or surface water. The investigation, led by the Functional Public Prosecutor's Office, is ongoing. It is unknown when a decision will be made.
- 2: Foundation Frisse Wind.nl (FW), which held TSIJ liable in 2023, has engaged the law firm Finch. On behalf of FW, Finch holds TSN and TSIJ liable in a letter dated 16 December 2024. On 3 February 2025, a meeting took place where all liability on behalf of TSN and TSIJ was rejected.



# Governance

**Tata Steel Nederland B.V. (TSN) has a mitigated structure regime with a two-tier board structure: the Board of Management (BoM) and the Supervisory Board (SB).**

## Board of Management

The role of the BoM is to manage the company, including setting and achieving its objectives and determining the strategy to achieve these objectives.

In the performance of its duties, the BoM is guided by the interests of the company and its business and, in doing so, carefully considers the interests of all stakeholders of the company, including the interests of its employees and ultimate parent Tata Steel Limited (TSL). The BoM is supervised by the SB. Members are appointed by the General Meeting of Shareholders of TSN and indirectly by TSL.

During the year 2024-2025, the BoM consisted of Hans van den Berg (Chief Executive Officer and Chair), Hans Turkesteen (Chief Financial Officer), who was appointed as successor to Martijn Plaum as of 1 September 2024, Akash Latchman (Chief Projects and Engineering Officer), who was appointed in this new role as of 18 November 2024, Tom Eussen (Managing Director of TSIJ) and Gunilla Saltin (Managing Director of TSDE).

Further to the planned consolidation and functionalisation of the TSN organisation, the BoM was reduced from five to four members, as of 1 July 2025. In this new structure, the BoM consists of the positions of Chief Executive Officer, Chief Financial Officer and the two newly created positions Chief Operations Officer and Chief Commercial Officer. Hans van den Berg and Hans Turkesteen continue in the roles of Chief Executive Officer and Chief Financial Officer respectively and Akash Latchman has taken on the role of Chief Operations Officer. The Chief Commercial Officer role is currently vacant and an appointment will be announced in due course.

As of 1 July 2025, the positions of Managing Director of TSIJ and Managing Director of TSDE expired, and Tom Eussen and Gunilla Saltin stepped down as members of the BoM.

## Members of the Board of Management



**Hans van den Berg**

Chief Executive Officer (CEO), Chair of the Board of Management

Hans van den Berg has Dutch nationality and started his career at Tata Steel (then Koninklijke Hoogovens) in 1990. He has since held various positions in R&D, the blast furnaces, Basic Oxygen Steel Plant 2, the cold strip mill and the direct sheet plant. He has been a member of the TSN Board of Management since April 2016.



**Hans Turkesteen**

Chief Financial Officer (CFO)

Hans Turkesteen was appointed CFO and member of the BoM of TSN in September 2024. He has Dutch nationality. Hans previously held various CFO positions, including at Intertrust, Stork and Imtech. Prior to that, he was Managing Partner M&A and Capital Markets at Deloitte and Managing Partner at Andersen.



**Akash Latchman**

Chief Operations Officer (COO)

In November 2024, Akash Latchman was appointed as member of the TSN BoM. He has South African nationality. As of 1 July 2025, he has taken on the role of COO. In this role, he is responsible for technology and innovation, the operations at the IJmuiden site and the realisation of TSN's Green Steel plan at the IJmuiden site. Akash previously held various senior executive positions at the South Africa- based chemicals and energy company Sasol and led several industrial mega projects in North America and Africa.

Supervisory Board

The SB supervises the policies pursued by the BoM and the general course of affairs of TSN, as well as assisting the BoM by providing advice. In discharging its role, the SB takes into account the interests of TSN and its stakeholders and advises the BoM thereon.

Members are appointed by the General Meeting of Shareholders of TSN, at the nomination of the SB itself. The SB and its members are not bound by any instructions and shall not receive a binding mandate. At least half of the members of the SB are not in any way involved in the management or supervision of companies belonging to the Tata Steel Group. A quarter of the members of the SB are female. The SB appoints its chair from among its members. The chair does not have a casting vote. Every third member of the SB is appointed considering the enhanced right of recommendation of the Central Works Council of TSN.

The SB evaluates and assesses its own performance and that of the members of the BoM. The SB may be assisted in this by an external party.

As of 1 September 2024, Mr Marius Jonkhart stepped down as a member of the SB and Chair of the Audit Committee. He was succeeded by Mr Herman Dijkhuizen, who was appointed as a member of the SB as of 1 September 2024. On 29 January 2025, Mr Henrik Adam stepped down as member of the SB and member of the Audit Committee. He was succeeded on the same date by Mr Koushik Chatterjee. Thereafter, the SB consisted of Mr T.V. Narendran (Chair), Mr Herman Dijkhuizen (Vice Chair), Mrs Claudia Zuiderwijk and Mr Koushik Chatterjee. Mr Narendran fulfils the role of CEO and Managing Director of TSL and Mr Chatterjee fulfils the role of Executive Director and CFO of TSL. Mrs Zuiderwijk and Mr Dijkhuizen are not in any way involved in the management or supervision of companies belonging to the Tata Steel Group.



T.V. Narendran (1965)  
Chair

Indian nationality

Appointed as SB member and Chair in 2021

Profession: CEO & Managing Director Tata Steel Ltd.

Other positions\*:  
Tata International Ltd.  
Tata Steel Europe Ltd.  
World Steel Association



Claudia Zuiderwijk (1962)

Dutch nationality

Appointed as SB member in 2024

Profession: CEO Gemeente Vervoerbedrijf (GVB)

Other positions\*:  
Currently none



Herman Dijkhuizen (1960)

Dutch nationality

Appointed as SB member in 2024

Profession: non-executive board member

Other positions\*:  
KPN N.V.  
N.V. Nederlandse Spoorwegen  
Kröller-Müller



Koushik Chatterjee (1968)

Indian nationality

Appointed as SB member in 2025

Profession: Executive Director & CFO Tata Steel Ltd.

Other positions\*:  
Tata Steel Europe Ltd.  
Global Task Force on Climate  
Related Financial Disclosures

Audit Committee

The Audit Committee undertakes preparatory work for the SB's decision-making regarding the supervision of the integrity and quality of the company's financial reporting and the effectiveness of the company's internal risk management and control systems.

The Committee consists of at least two members of the SB, who are appointed by the SB from among its members. At least half of the members of the Audit Committee are not in any way involved in the management or supervision of a company (or companies) forming part of Tata Steel Group. The chair of the Audit Committee, appointed by the SB, cannot also be the chair of the SB and is not in any way involved in the management or supervision of a company (or companies) forming part of Tata Steel Group.

Remuneration Committee

The Remuneration Committee of the SB prepares the remuneration policy and remuneration of the BoM members to advise the shareholder in this respect. The remuneration is determined by the shareholder. In addition, the Remuneration Committee prepares the assessment of the functioning of the members of the BoM.

Diversity

TSN, being a private large company, has drawn up appropriate and ambitious target figures for the BoM, SB and sub-top of the company in order to reach gender diversity. For the BoM, the target was to have a female board member appointed before 2024. With the appointment of Mrs Gunilla Saltin in November 2023, this target was met. For the SB, the target is that at least 50% of the members who are not in any way involved in the management or supervision of companies that belong to the Tata Steel Group are female. This target has also been met. With regard to the sub-top of the company, the target is that 33% of TSN's sub-top leaders will be female by 2030.

Remuneration

The remuneration for the members of the BoM for the financial year 2024–2025 was a combination of a base salary; a short-term incentive plan linked to safety performance and financial results; and a long-term incentive plan linked to relative competitive performance and sustainability targets. The long-term incentive plan, with a maximum headroom of 100% of a year's salary, depended for one-third on ESG-related targets on gender diversity, environmental performance and decarbonisation.

The remuneration for the members of the SB is determined by the General Meeting of Shareholders. The amount of remuneration does not depend on TSN's results. See Remuneration of and loans to members of the Board of Management and of the Supervisory Board on page 161.

\* other positions are mentioned that could be relevant to the performance of the duties of the Supervisory Board



# GENERAL DISCLOSURES



## Basis for preparation

### Introduction

Tata Steel Nederland (TSN) will likely be required to report in compliance with the European Union (EU)'s Corporate Sustainability Reporting Directive (CSRD; in force since 5 January 2023) from the financial year 2027–2028 onwards. In preparation for this, we have set an internal ambition to prepare for CSRD readiness by the financial year 2025–2026.

This 2024–2025 sustainability statement is the first step in our transition to CSRD-compliant reporting. We have prepared it according to own reporting principles based on the current European Sustainability Reporting Standards (ESRS), which were adopted by the European Commission on 31 July 2023. As a result, we have also incorporated several material disclosures that are set out in the ESRS. It should be noted that this report is not assured by an external assurance provider.

We expect that our transition to CSRD-compliant reporting will strengthen our environmental, social and governance (ESG) policies, strategies and target-setting for all material ESG topics, and, in turn, this will help drive the improvement of our ESG performance in the coming years. As part of the transition, we will formulate and enhance policies and controls and set appropriate targets.

In the financial year 2024–2025, we conducted a first double materiality assessment (DMA).

### Reporting scope

This report has been prepared on a consolidated basis, similar to the financial statements. In our DMA, we assessed the material topics connected to TSN's own operations (which include Tata Steel IJmuiden (TSIJ) and Tata Steel Downstream Europe (TSDE)) as well as the upstream and downstream value chain. Regarding greenhouse gas (GHG) emissions reporting, operational control is assumed by Vattenfall, which causes a deviation from the financial statement consolidation basis. The extent to which our disclosures cover TSN's value chain depends on the nature of the issues as discussed in 'Double materiality assessment' below and is further elaborated on in each topical chapter.

### Time horizons

This sustainability statement has been prepared in line with the time horizons set out in ESRS 1:

- Short term: up to one year
- Medium term: one to five years
- Long term: more than five years

Any deviations from these timelines are addressed and explained in the relevant disclosure.

### Key sources of estimation and outcome uncertainty

In preparing for qualitative and quantitative disclosures, TSN makes judgements and uses estimates and assumptions that are critical for the data we report. When disclosing forward-looking information – such as targets, ambitions and objectives – we acknowledge its inherent uncertainties and specify that such information is subject to change. Inherent to using estimates and assumptions is the recognition that this information is uncertain and that actual data might differ from previous estimations. We disclose the assumptions and approximations we have used, to provide context for and support understanding of our disclosures.

Within our own operations, the emission levels of pollutants are measured at different frequencies and multiple measuring points, in accordance with local regulations and permit requirements. The sample locations and frequency are designed to deliver the most representative data set possible, taking into account the inevitable variations across an operating plant located over a large surface area. As with all sampled data, however, it cannot be guaranteed that all emissions are detected 100% of the time.

For metrics involving upstream or downstream value chain information, we require estimations or proxy data from the sector; for example, when measuring GHG emissions and particularly Scope 3 emissions. We disclose this where relevant.

Changes in preparation or presentation of sustainability information

Having previously followed the GRI Standards, TSN has prepared this year’s sustainability statement according to own reporting principles based on the current ESRS, in order to prepare for CSRD readiness by the financial year 2025-2026 as per internal ambition and to report in compliance with the CSRD in the financial year 2027–2028. No key changes in calculation criteria or methodologies were needed, and where the reporting scope or calculation changed, it is reported in the relevant topical chapters. In the coming years, TSN aims to further improve its data quality and target-setting, which will steer our sustainability performance and reporting. We will also take into account the effects of February 2025’s Omnibus proposal in upcoming sustainability statements.

Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

In preparing this report, TSN has included disclosures from other recognised sustainability reporting standards and legislation, in order to provide a holistic view of our sustainability performance and facilitate sector benchmarking. These have been integrated into our reporting framework and either supplement the ESRS requirements or follow other regulatory guidance on reporting on certain ESRS elements.

ESG sustainability governance

TSN’s Board of Management (BoM) is responsible for managing sustainability, with responsibility for its execution disseminated throughout the organisation. The governance structure comprises the Supervisory Board (SB), the BoM and the Director Sustainability. The BoM and SB are, respectively, our management and supervisory bodies. In this chapter, we focus on specifically ESG-related governance roles; see the 'Governance' section of our management review for details of all board roles and responsibilities.

The role of the administrative, management and supervisory bodies

The BoM is responsible for the daily management of the company as well as for determining its strategy, including its sustainability strategy. The SB supervises and advises the BoM. Both boards bring extensive experience and knowledge in dealing with sustainability-related matters. The BoM has full oversight and control over ESG, where the Chief Executive Officer (CEO) leads TSN’s ESG strategy and implementation. The CEO is supported by two key ESG persons:

- The Chief Operations Officer (COO) oversees all projects on site, including key sustainability projects such as our decarbonisation efforts. They lead the plans for the construction of the direct reduction plant (DRP) and electric arc furnace (EAF), which are crucial for TSN’s ambition to achieve net-zero CO<sub>2</sub> emissions by 2045.

- The Director Sustainability, appointed in October 2024, who oversees at the executional level the enhancement of ESG reporting (including reporting systems) to drive sustainability improvements throughout our organisation. The Director Sustainability reports to the CEO and is supported by senior managers and experts from different functions.

Sustainability-related performance incentives

To guarantee accountability and ensure focus on our key sustainability issues, our performance relating to specific sustainability matters is incorporated into the remuneration for TSN’s BoM.

Due diligence

TSN is in the process of deploying due diligence and risk assessments related to all its ESG matters. Due diligence procedures are described in the relevant topical chapters.

Risk management and internal controls over sustainability reporting

TSN is in the process of integrating sustainability risks related to all material topics into its enterprise risk management (ERM) framework, which aims to identify, assess, monitor and mitigate risks, aligning with Tata Steel Group’s standards and international best practices. The ERM framework evaluates the scale and likelihood of potential risks impacting our business and sustainability goals, and therefore helped to inform our DMA process (see ‘Double materiality assessment’). Subsequent chapters in this statement detail TSN’s methods for mitigating these risks.

TSN is developing internal controls for sustainability reporting as part of its voluntary early alignment with ESRS requirements. To ensure the accuracy and quality of reported information, our subject matter experts, department leads and senior management conduct multiple reviews to check for consistency and plausibility.

We plan to implement more structured risk management and internal controls over sustainability reporting in the future, in order to enhance our understanding and mitigation of ESG risks. This is part of a larger initiative to strengthen ERM at TSN, for which the new role of Director Risk & Compliance was created on 1 June 2025.

ESG sustainability strategy

Business model

At TSN, we provide high-quality steel for various industries in the Netherlands and globally, including energy transition sectors like solar panels and wind turbines. Traditional steel production is energy and resource intensive, which impacts the climate and environment. By focusing on innovation and sustainability, we aim to reduce this impact. We are committed to becoming a cleaner, green and circular steel company, continuously enhancing our environmental performance and adopting sustainable practices.

Our sustainability strategy

With our sustainability strategy – Cleaner, Green and Circular – we aim to realise our commitment to sustainable steel production:

- Cleaner: Reducing emissions and pollution at TSIJ.
- Green: Achieving net-zero CO<sub>2</sub> emissions by 2045 (Scope 1 and 2).
- Circular: Maximising material reuse through a circular economy model.

TSN’s sustainability strategy drives progress on issues that are vital to our business, our society and the environment. We will explore these topics in the following chapters.

Climate change

TSN aims to achieve net-zero CO<sub>2</sub> emissions for Scope 1 and 2 by 2045, aligning with the Tata Group’s climate targets and the Paris Agreement. This involves a two-phase ‘Green Steel Plan’ to replace current coal-dependent assets at TSIJ with new processes using renewable sources of energy and the implementation of a large number of other measures across all our operations.

This plan is directly aligned with the climate goals of the Dutch government. TSN is currently in discussions with the Dutch government for a custom support agreement to jointly realise its first phase, which aims to reduce Scope 1 CO<sub>2</sub> emissions by 40%, while still maintaining our position as a high-volume producer of high-quality steel.

Pollution and affected communities

We aim to minimise our environmental impact and maintain dialogues with local stakeholders. We engage in local partnerships, support local initiatives and involve our community in our activities.

Own workforce

We prioritise the health, mental well-being and safety of our employees. We foster equal opportunities and invest in training and development for our entire workforce.

Key challenges

Proactive environmental measures

During the year, TSIJ faced several legal enforcement actions from the Environmental Agency for the North Sea Canal Area (EA) due to alleged environmental non-compliance. TSIJ does not agree with the measurement methods and legal interpretations used by the EA and has initiated legal proceedings.

Despite legal challenges, we are pursuing technical solutions and have submitted to the EA action plans to address the concerns. Working proactively with the EA and improving our environmental performance is a key priority for TSN. This includes strengthening our internal controls to minimise the risk of non-compliance, particularly in areas related to pollution and the living environment.

As part of these technical solutions, we are increasing the number of staff working on environmental governance, expanding emissions monitoring, promoting behavioural change and improving our complaints process.

We are actively discussing these efforts with the EA and the Province of North Holland, focusing on identifying systemic improvements needed to enhance industrial emissions measurement practices.

Support for our Green Steel Plan

TSN’s transition to low-CO<sub>2</sub> steelmaking requires significant investment, making government and shareholder support essential. We are working closely with the Dutch government and Tata Steel Limited to secure financial aid, policy support and infrastructure permits. A custom support agreement with the Dutch government is being discussed, with input from advisory bodies and the EU Commission. This collaboration aims to enable the first phase of TSN’s decarbonisation plan. The following chapters explain how TSN is navigating these challenges and working to reduce the impacts and risks related to sustainability matters.

Additional details about TSN’s strategy and business model, including our key products, markets, customer groups and employee headcount, can be found in the ‘Our strategy’ section of our management review and in the chapter Own workforce.



Value chain

TSN's value chain encompasses the process from raw material procurement to the distribution and recycling of finished steel products. Upstream, raw materials like iron ore and coal are procured from international suppliers and transported to IJmuiden via the seaport. They are then processed by TSN to produce steel, which is often transported as packed coils or sheets to TSDE entities for further processing. We distribute finished products to customers directly from TSIJ, or via TSDE business units and our network of distribution hubs, via rail, road and water. TSN's products are used in various market segments and eventually undergo end-of-life treatment, often involving the collection and recycling of scrap steel.

Interests and views of stakeholders

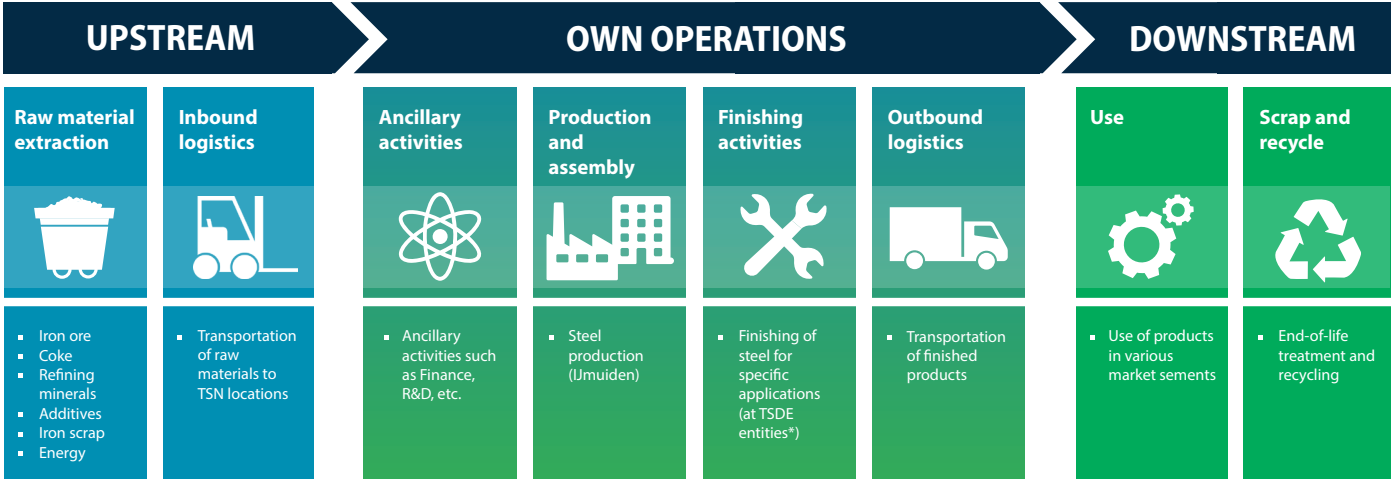
Engaging with both internal and external stakeholders on sustainability issues is a vital and ongoing process. Through our Green Steel Plan and Roadmap programme – detailed in chapters Climate change and Pollution – we aim to significantly reduce emissions and pollution. As part of these programmes, we engage with residents in the IJmond region and government stakeholders, involving them in site developments, raising awareness and listening to concerns. These efforts are designed to reduce the environmental impact and improve the living environment surrounding TSIJ.

The CEO is regularly updated by the Director Communications and, when relevant, discusses stakeholder concerns to ensure sustainability impacts remain a high priority.

Our CSRD implementation programme will help strengthen the critical role that stakeholder dialogue plays in shaping TSN's sustainability strategy, policies and actions for managing material topics. Insights from the ongoing stakeholder engagement informed our DMA process. In this context our stakeholder engagement is essential to identify material sustainability topics, to identify risks and opportunities for new sustainability initiatives and to set priorities. For this purpose, we used desk-top studies, external advisors and subject matter experts amongst our employees.

TSN wants to remain responsive to stakeholders' evolving needs. Societal expectations are evolving, and that there has been criticism that TSN has, at times, been too slow to respond to these changes. Guided by our corporate values and stakeholder feedback, we intend to be more proactive in recognising and acting on stakeholder concerns.

Further detailed information on our stakeholder engagement approach is provided in the relevant topical standard chapters and in the 'Stakeholder engagement' section of the management review.





Our four-step process



Double materiality assessment

This was our first year of carrying out an initial DMA considering the relevant ESRS requirements. We will update our sustainability matters annually, based on regulatory developments, business developments and stakeholder engagement. We expect that evolving regulatory requirements and ESRS implementation guidance will bring new insights in the years to come. To determine the disclosures in our sustainability statement, we followed a structured DMA process with four main steps.

Step 1: Stakeholder and value chain mapping

To conduct the DMA, TSN first identified the stakeholders likely to be materially impacted by its operations or business relationships throughout the value chain. The process included identifying internal and external stakeholders relevant to every potential sustainability matter. We considered the stakeholders discussed in the 'Stakeholder engagement' section of our management review – particularly TSN's own workforce and local residents, as well as affected local communities, members of the Dutch parliament, governmental representatives, customers and investors – and used ongoing stakeholder involvement to inform our DMA.

We then broadly mapped our value chain, considering both upstream (materials and service sourcing) and downstream (product delivery) elements. All value chain segments illustrated in the value chain section were included in the DMA.

Step 2: Identification of potential sustainability matters

This stage was informed by the list of potential sustainability matters in the topical ESRS and enriched by other potential sustainability matters that arose from our peer and sector analysis or metals and mining sector guidance. Sustainability matters may be interconnected and can have a short-to-medium-term or long-term effect across the value chain. For our own operations within the value chain, we distinguished between TSIJ and TSDE and between specific activities. We focused on activities, business relationships and geographies with heightened risks of adverse impacts.

Step 3: Assessment of sustainability matters

We assessed our identified sustainability matters in line with the principles outlined in ESRS 1. For impact materiality, the severity of negative impacts was assessed based on scale, scope, irremediability

and likelihood. Positive impacts were assessed based on scale and scope, with their likelihood also considered. Financial materiality was assessed based on the magnitude and likelihood of financial effects. The scoring system was aligned with TSN's ERM manual.

Our DMA highlighted the importance of including the right stakeholders in qualitative discussions of the relevant matters at this stage. While our assessment phase also used quantitative scoring and threshold mechanisms and quantitative input from external stakeholders (such as surveys and reports), we concluded that relevant department and internal stakeholder involvement was crucial. Our topical assessment workshops gathered key departments, including Sustainability, Operations, Finance, Human Resources (HR), Risk, Health & Safety, Procurement, Legal and Environment.

Step 4: Validation of outcome

After completion of the assessment workshops, the results were subject to further scrutiny by senior management and subject matter experts, who reviewed the results to ensure their accuracy. Final approval and validation were obtained from the BoM. Since our sustainability matters are mainly relevant in the short and medium term and are already addressed in our day-to-day strategy and business activities, we treat them all with equal importance when it comes to taking action.

Material topics

The outcome of our initial DMA is shown in the table, which presents TSN's material sustainability topics across our own operations and our upstream and downstream value chain. The interaction between the material topics and TSN's strategy and business model is detailed in the relevant chapters.

As we will use the next two years to finalise our DMA and to prepare for CSRD compliance, we are currently putting in place a granular implementation roadmap to support this. Our disclosures in this year's sustainability statement are based on current ESRS requirements where possible, with entity-specific disclosures included where necessary.

Both the outcome of the DMA and our ongoing CSRD implementation efforts support us in managing our material sustainability topics more effectively. These processes enable us to enhance our strategies and policies, update our action plans and monitor our progress and performance.

TSN's material sustainability topics as per our initial DMA

ESG	Material topic	Material sub-topic	Value chain	Time horizon
Environment	Climate change	GHG emissions	Upstream & own operations	Short, medium & long term
		Energy consumption and mix	Own operations	Short, medium & long term
	Pollution	Pollution of air, water and soil	Upstream & own operations	Short, medium & long term
		Substances of concern and very high concern	Upstream & own operations	Short, medium & long term
	Water and marine resources	Water withdrawals	Upstream	Short, medium & long term
		Water discharges	Upstream & own operations	Short, medium & long term
	Biodiversity and ecosystems	Drivers of biodiversity loss	Own operations	Short, medium & long term
		Impact on biodiversity due to mining	Upstream	Short, medium & long term
	Resource use and circular economy	Resource inflow	Upstream & own operations	Short, medium & long term
		Resource outflow	Own operations & downstream	Short, medium & long term
Social	Own workforce	Waste	Upstream, own operations & downstream	Short, medium & long term
	Responsible value chain	Health and safety	Own operations	Short & medium term
		Working conditions	Own operations	Short & medium term
		Equal treatment and opportunities for all	Own operations	Short & medium term
	Affected communities in the IJmond region	Working conditions for value chain workers	Upstream	Short & medium term
		Human rights of value chain workers and affected communities	Upstream	Short & medium term
Governance	Business conduct	Human rights impacts on affected communities around the IJmond region	Own operations	Short & medium term
		Business ethics and code of conduct	Own operations	Short & medium term
		Anti-bribery and anti-corruption	Own operations	Short & medium term



# ENVIRONMENT



## Climate change

### Why this topic matters

Steel production is energy intensive. As a consequence, Tata Steel Nederland (TSN) is one of the largest industrial CO<sub>2</sub> emitters in the Netherlands, generating around 11–13 million tonnes of CO<sub>2</sub> per year. The majority of TSN's emissions arise from the processes associated with the production of liquid steel. In addition to these direct emissions, we acknowledge the indirect Scope 3 emissions from our value chain. Greenhouse gas (GHG) emissions and energy consumption are therefore material sustainability matters.

TSN's climate transition plan will transform steel production at Tata Steel IJmuiden (TSIJ) to a completely different process. In doing so, the use of coal will be drastically reduced in our steelmaking activities and many other measures will be taken all throughout our operations.

As agreed in an Expression of Principles with the Dutch Government, our climate transition plan will form a major building block of the national Climate Agreement (Klimaatakkoord), a comprehensive plan adopted in 2019 to drastically reduce GHG emissions and transition the Netherlands to a sustainable, low-carbon economy.

GHG emissions and energy consumption are material sub-topics for TSN and are driving our transformation.

### How we manage this topic

TSN aims to achieve net-zero CO<sub>2</sub> emissions for Scope 1 and 2 by 2045, aligning with the Tata Group's climate targets and the Paris Agreement. TSN has not yet defined an emissions reduction plan for Scope 3 emissions.

As the Netherlands' largest industrial emitter, TSN's decarbonisation efforts will contribute significantly to national climate goals. The Dutch government sets industry targets based on Scope 1 emissions. Accordingly, our transition plan focuses primarily on reducing direct Scope 1 emissions, which represent the large majority of our total Scope 1 and 2 emissions. We calculate our CO<sub>2</sub> emissions (for Scope 1, 2 and 3) in accordance with the GHG Protocol. This indicates that approximately 70% of CO<sub>2</sub> emissions originate from our production processes in IJmuiden (Scope 1). The remaining emissions are mainly Scope 3 emissions from activities in our upstream and downstream value chain. Scope 2 emissions for the TSIJ integrated steelworks are practically nil.

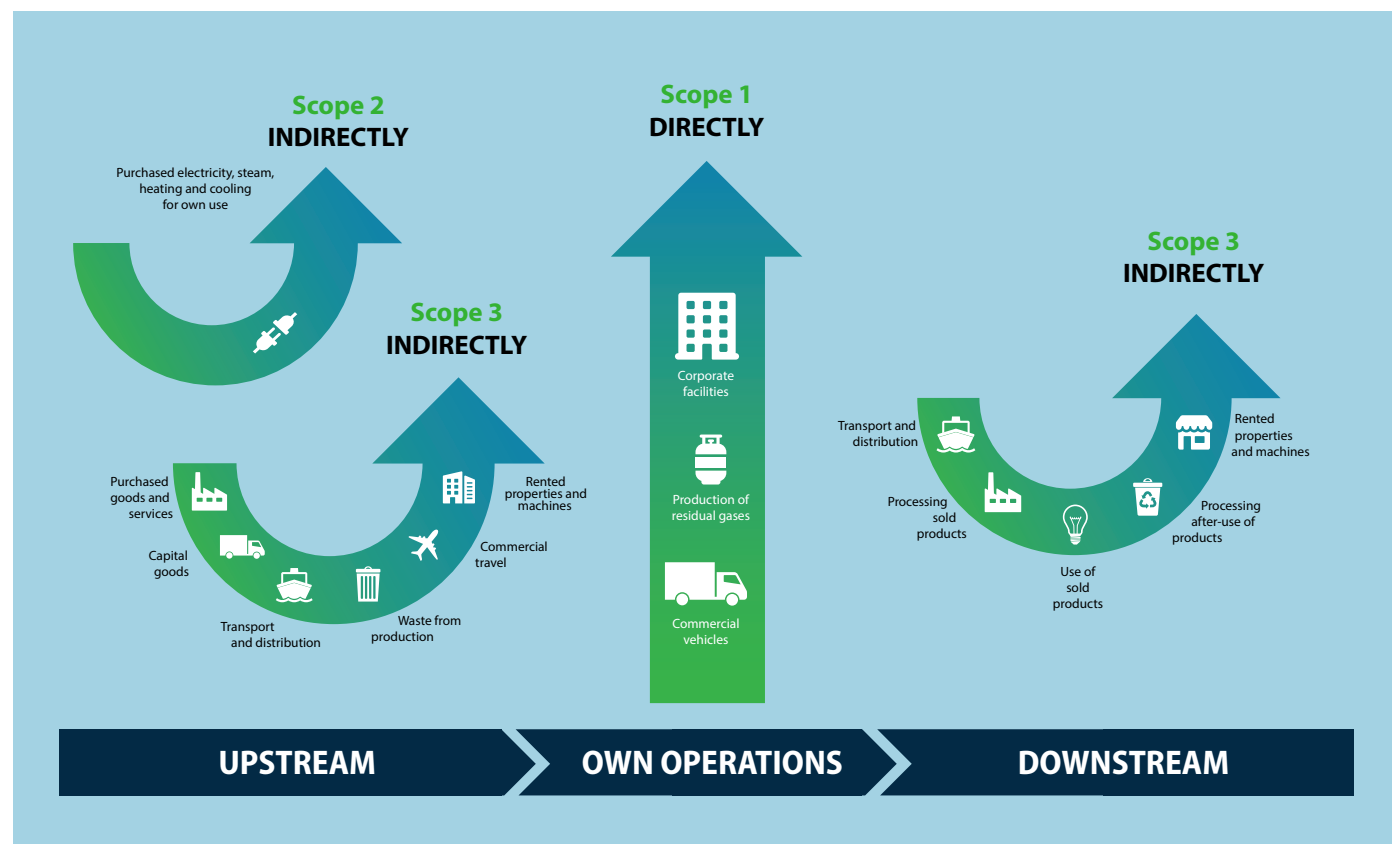
TSIJ's steelworks in IJmuiden includes several facilities that are part of the integrated industrial complex, but are not owned by Tata Steel. These third-party facilities consume energy supplied by one or more of TSIJ's operations and, in turn, produce essential inputs – such as electricity, steam or oxygen – that are used by TSIJ within the same complex.

These facilities are highly interdependent with TSIJ's operations. They rely almost entirely on TSN for their energy supply, and the majority – if not all – of their output is consumed by TSIJ. Because their inputs, outputs and operational planning are integral to the functioning of the industrial complex, we consider them to fall under TSN's operational control, as defined by the GHG Protocol.

As a result, TSN includes the CO<sub>2</sub> emissions from these third-party operations in its own emissions reporting. This approach applies to two specific types of operations:

- Vattenfall power plants: these three power plants operate using residual gases from TSIJ's steel production, supplemented by a very small fraction of externally sourced natural gas. The CO<sub>2</sub> emissions from burning these gases are reported under TSIJ's Scope 1 emissions. As a result, the electricity and steam produced by these plants are considered 'Scope 2 free' for TSIJ, since the associated emissions are already accounted for under Scope 1.
- Linde oxygen production: Linde operates production facilities located on the TSIJ site, supplying oxygen for TSIJ's processes. These facilities use electricity and steam from both the Vattenfall plants and TSIJ's own generation. The majority of produced oxygen is consumed by TSIJ, including part of its by-products, such as nitrogen and argon. A substantial portion of these by-products are sold to third parties. The electricity used to produce the gases consumed by TSIJ is treated as TSIJ's own electricity use. The energy used to produce gases for third parties is considered Linde's own use and is not included in TSIJ's emissions reporting. This approach to CO<sub>2</sub> accounting is also contractually agreed with the companies mentioned.





## Approach

In order to drastically reduce CO<sub>2</sub> emissions, we have a transition plan for climate change mitigation. We currently aim to replace two blast furnaces and two coke and gas plants (CGPs) at TSIJ with direct reduction plants (DRPs), which, combined with electric arc furnaces (EAFs), will produce liquid steel using natural gas, biomethane and/or green hydrogen when available. The new installations will enable the production of steel with a very low CO<sub>2</sub> footprint and will be supported by additional environmental measures to further reduce impact. Alongside this major transition, we will take many additional measures across all our operations in order to reach net-zero by 2045 (Scope 1 and 2). In this context we are also studying the use of carbon capture and storage (CCS) technology in combination with the DRP.

This journey to net zero is built on three pillars:

### 1 - Green Steel Plan

A transition plan to reduce our reliance on coal by replacing it with wind energy, natural gas, biomethane and, ultimately, renewable hydrogen.

### 2 - New Zeremis® product offerings

A product brand with several propositions aimed at increasing the adoption of low-CO<sub>2</sub> steel solutions by our customers.

### 3 - Additional CO<sub>2</sub> saving initiatives

All additional decarbonisation measures across TSN's operations to achieve net-zero by 2045 (Scope 1 and 2). Current initiatives include:

- Repurposing residual gases
- Energy-saving measures
- CO<sub>2</sub> emissions reduction at Tata Steel Downstream Europe (TSDE)

While we describe these key strategic pillars and related actions separately, they are interconnected in their approach and effects.

With the decision to build a DRP and EAF we are preparing for the hydrogen economy and stimulating the production of (green) hydrogen in the Netherlands. While we will start with natural gas, the installations are ready to use hydrogen as soon as it is available and affordable, and can even use both at the same time. The decarbonisation of other assets will be achieved through several measures, such as the use of hydrogen and biomethane, electrification and energy reduction.

## Green Steel Plan

### Scope

The Green Steel Plan focuses on our IJmuiden site, aiming to reduce production-linked emissions (Scope 1).

### Actions

The Green Steel Plan forms the foundation of TSN's decarbonisation journey and a first step in our aim to produce low-CO<sub>2</sub> steel with a lower environmental footprint. As described in chapter General disclosures, the plan involves two phases, each replacing one blast furnace and one CGP with new processes to produce liquid steel using natural gas, biomethane and/or green hydrogen (when available).

TSN is currently focusing on phase 1 of the plan, in which a DRP combined with an EAF will be built. This phase includes additional environmental measures, such as covering several IJmuiden raw materials storage yards, that together with the improvements from our Roadmap programme (see chapter Pollution) will reduce emissions and improve the living environment.

TSN relies on support from the Dutch government – in the form of financial and energy (tax) policy support, as well as permits for renewable energy and hydrogen infrastructure – to realise the Green Steel Plan. In November 2023, TSN therefore submitted a revised request for a custom support agreement with the Dutch government, jointly aiming to realise the first phase of its Green Steel Plan by 2030.

TSN will also need support from its parent company Tata Steel Limited to realise the Green Steel Plan. In a public letter dated 22 May 2025, T.V. Narendran, Chief Executive Officer (CEO) of Tata Steel Limited, once again reiterated that the parent company plans to co-invest in the Green Steel Plan alongside the Dutch government and the deployment of TSN's own cashflow towards the project.

We are currently in ongoing discussions aimed at signing a Joint Letter of Intent (JLoI) with the Dutch government on this custom support agreement. A governmental advisory committee on custom agreements for industry sustainability and the IJmond Health Expert Group (established by the Ministry of Infrastructure and Water Management) will review and advise the JLoI before it is made public and developed into a definitive and binding agreement. The European Commission will also be involved in the formal processes for state aid approval.

### Independent advice and progress on the Green Steel Plan

To assess TSN's plan, the Ministry of Economic Affairs and Climate Policy appointed external advisors Mr Wijers and Mr Blom, who presented their report on 28 March 2024. This report outlined five alternative scenarios for supporting TSN's decarbonisation efforts. On the same day, the cabinet informed parliament of its intention to explore negotiations with TSN based on the Green Steel Plan, including accelerated measures to reduce environmental impact.

This approach also aligns with recommendations from the IJmond Health Expert Group. In its first report, published on 28 February 2024, the Expert Group advised that health measures must be integral to the custom support agreement. A second report, published on 4 October 2024, recommended making a Health Impact Assessment (HIA) mandatory for the Green Steel Plan and its related custom support agreement.

Both reports confirm broad support for continuing steel production at the IJmuiden site, provided that potential health impacts are properly addressed. TSN acknowledges the urgency of doing so and, following the cabinet's negotiation mandate on 26 April 2024, aims to progress towards a custom support agreement with continued backing from parent company Tata Steel Limited. Discussions with the government to reach a custom support agreement in support of our green transition are ongoing. Meanwhile, the permitting process for new facilities has begun, and a draft environmental impact assessment (EIA) was submitted on 20 December 2024.



Steps toward government support

- July 2022: Signing of adjusted Expression of Principles with Dutch government.
- October 2022: Request submitted for custom support to enable first phase of the decarbonisation plan.
- February 2023: Green industrial zone agreement offered by the business community to regional politicians.
- March 2023: Approval from the North Holland provincial authorities for the Green Steel Plan production to start.
- April 2023: Kick-off of Green Steel Plan participation process involving local residents.
- June–July 2023: In-depth discussions and theme meetings with various stakeholders as part of the participation process.
- November 2023: Improved Green Steel Plan submitted to government as part of custom support process.
- February 2024: First report of the IJmond Health Expert Group, about health measures being integral to the custom support agreement.
- March 2024: Government advisors publish report on Green Steel Plan versus alternatives viewed from the perspective and policy choices of the State.
- March 2024: Dutch cabinet indicates that it seeks a custom agreement with TSN and examines feasibility of accelerating TSN's sustainability plans.
- April 2024: Confirmation from the cabinet of its mandate to negotiate custom support with TSN.
- May 2024: Broad support in the House of Representatives for a faster transition towards the Green Steel Plan.
- October 2024: Second report of the IJmond Health Expert Group, about an HIA for the Green Steel Plan and its custom support.
- November–December 2024: Information evenings provide updates to stakeholders on future sustainable steel production.
- December 2024: Draft EIA for the Green Steel Plan submitted.
- June 2025: Final EIA for the Green Steel Plan submitted.

Improved Green Steel Plan

In 2024–2025, we continued collecting stakeholder feedback to gather input for and further improve our Green Steel Plan, engaging actively with local communities through a participation programme. This process included surveys and participation meetings where local residents could share their input. As a result, we have adjusted the plan to emphasise further reductions in emissions (including fine dust and nitrogen) and nuisance for the surrounding area. This was also one of the recommendations of a report published by the National Institute for Public Health and the Environment (RIVM). In November 2024, we submitted this amended plan to the Ministry of Economic Affairs as part of the custom support process.

Investment in alternative energy

Reaching our goal of producing net-zero steel production by 2045 depends on the availability of sufficient green hydrogen. We are therefore in discussions with potential hydrogen supply partners.

TSN is also taking active steps to transition towards renewable energy sources such as such as biomethane, solar and and wind. Several TSN

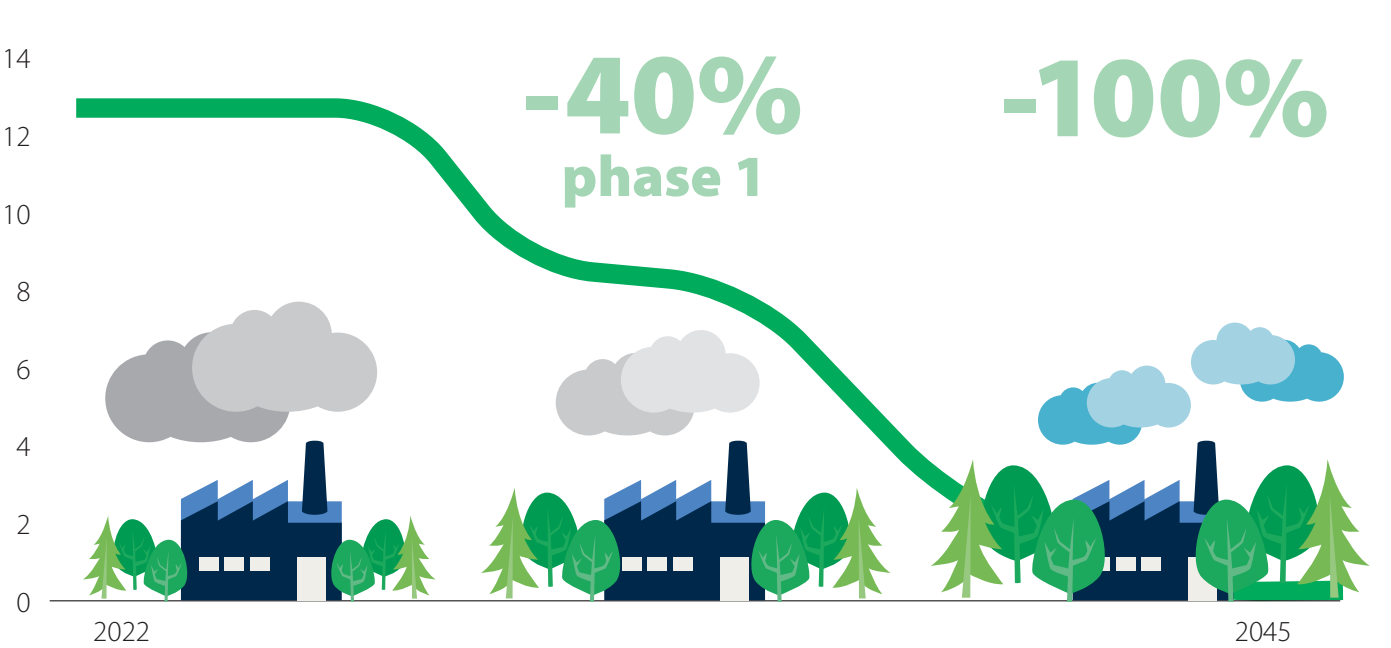
sites and offices have solar installations or energy contracts to procure renewable energy. We actively engage with developers of offshore wind parks in the North Sea to support our future energy needs.

Targets and performance

As part of TSN's commitment to achieving net-zero CO<sub>2</sub> emissions for Scope 1 and 2 by 2045, we are working closely with the Dutch government to realise phase 1 of our Green Steel Plan.

Phase 1 aims to reduce TSIJ's CO<sub>2</sub> emissions by 40% (Scope 1), which amounts to a CO<sub>2</sub> reduction of up to 5 million tonnes per year compared to the baseline value of 12.6 million tonnes. This target and baseline were agreed in the Expression of Principles with the Dutch government. They are based on the following: while TSN's annual CO<sub>2</sub> emissions may vary with demand fluctuations caused by economic cycles, we use a fixed baseline that combines TSIJ's actual CO<sub>2</sub> emissions per tonne of steel during FY18 with the nominal Ijmuiden site capacity of 7.23 million tonnes of crude steel per year, resulting in a baseline of 12.6 million tonnes of CO<sub>2</sub> emissions (Scope 1).

Ambition Scope 1 and Scope 2 reduction



Steel production - TSIJ

Steel production (in million tonnes)	FY2024/25	FY2023/24	%FY(2024/25) / FY (2023/24)
Crude steel production	6.57	4.66	41%
Liquid steel production	6.75	4.81	40%

The recommissioning of Blast Furnace 6 in in financial year 2024–2025, following its closure for maintenance in the prior year, led to a 41% increase in crude steel and 40% in liquid steel production. This increase in production activity contributed to higher energy consumption and emissions, as detailed in the table below.



GHG emissions calculated based on GHG Protocol<sup>1</sup> - TSN

unaudited/no assurance

Emission category	FY2024/25	FY2023/24	%FY(2024/25) / FY(2023/24)
Scope 1 GHG emissions			
Gross Scope 1 GHG emissions (million tCO <sub>2</sub> e)	11.45	8.63	+33%
Scope 1 GHG emissions from regulated emission trading schemes	100%	100%	
Scope 2 GHG emissions			
Gross location-based Scope 2 GHG emissions (million tCO <sub>2</sub> e)	0.02	0.11	-84%
Gross market-based Scope 2 GHG emissions (million tCO <sub>2</sub> e) <sup>2</sup>	0.02	0.10	-82%
Scope 3 GHG emissions			
Total gross indirect (Scope 3) GHG emissions (million tCO <sub>2</sub> e)	4.13	3.75	+10%
Total GHG emissions			
Total GHG emissions (location based) (million tCO <sub>2</sub> e)	15.59	12.49	+25%
Total GHG emissions (market based) (million tCO <sub>2</sub> e)	15.59	12.48	+25%

<sup>1</sup> Scope 1 and 2 emissions are reported for TSN's key production site in IJmuiden and material sites in TSDE. The reported emissions for TSN Group account for 99.7%.

<sup>2</sup> In FY 24/25, TSN's Scope 2 emissions originated solely from TSDE. TSUJ reports its emissions under the assumption of operational control of the local Vattenfall power plants (refer to section 'How we manage this topic'). GHG emissions due to electricity production at Vattenfall are therefore reported under Scope 1 of TSUJ. Due to limited source verification and residual mix data, market-based emissions were reported to match location-based figures.

GHG emissions calculated based on World Steel Association guidelines (WSA methodology considered as entity-specific disclosure)<sup>1</sup> - TSN

unaudited/no assurance

Emission category - TSN	FY2024/25	FY2023/24
Gross Scope 1 GHG emissions (million tCO <sub>2</sub> e)	11.43	8.66
Gross Scope 2 GHG emissions (million tCO <sub>2</sub> e)	-0.09	0.22
Gross Scope 3 GHG emissions (million tCO <sub>2</sub> e)	-0.12	-0.19
Total GHG emissions (million tCO <sub>2</sub> e)	11.21	8.69

<sup>1</sup> Scope 1 and 2 emissions are reported for TSN's key production site in IJmuiden and material sites in TSDE. The reported emissions for TSN Group account for 99.7%.

GHG emissions calculated based on World Steel Association guidelines<sup>1</sup> - TSUJ

unaudited/no assurance

Emission category – TSUJ	FY2024/25	FY2023/24
Gross Scope 1 GHG emissions (million tCO <sub>2</sub> e)	11.33	8.55
Gross Scope 2 GHG emissions (million tCO <sub>2</sub> e)	-0.11	0.10
Gross Scope 3 GHG emissions (million tCO <sub>2</sub> e)	-0.12	-0.21
Total GHG emissions <sup>6</sup> (million tCO <sub>2</sub> e)	11.09	8.44
CO <sub>2</sub> emission intensity (tCO <sub>2</sub> /tonnes of crude steel)	1.69	1.81

<sup>1</sup> Scope 1 and 2 emissions are reported for TSN's key production site in IJmuiden and material sites in TSDE. The reported emissions for TSN Group account for 99.7%.





In some years, TSIJ generates surplus electricity that is exported to the grid. These exports occur on an ad-hoc basis and are not part of a planned or recurring strategy. Under the World Steel Association (WSA) methodology, market-based accounting allows for negative Scope 2 GHG emissions when electricity is exported. Since all emissions from electricity generation for TSIJ are reported under Scope 1 (see section ‘How we manage this topic’), Scope 2 emissions can become negative in years when surplus electricity is sold, such as in 2024–2025.

Scope 1 includes direct emissions from the IJmuiden site and emissions resulting from the combustion of our flue gases at Vattenfall. Scope 2 includes the emissions related to the purchase of heat and electricity and credits for delivery of energy to Vattenfall. Scope 3 includes a limited set of upstream emissions related to the production of purchased raw materials (coke, pellet, burnt lime, direct reduced iron etc. for the production of purchased argon, oxygen, nitrogen and hydrogen) and is reduced by credits for the cement industry's use of our granulated blast furnace slag, which resulted in a negative Scope 3 value for this year. Worldsteel's Scope 3 does not include emissions related to mining and transportation of raw materials to the site, nor transportation of products from our site to our customers.

GHG intensity			unaudited/no assurance
GHG intensity per net revenue	FY 2024/25	FY 2023/24	%FY (2024/25) / FY (2023/24)
Total GHG emissions (location-based) (million tCO <sub>2</sub> e)	15.59	12.49	+25%
Total GHG emissions (market-based) (million tCO <sub>2</sub> e)	15.59	12.48	+25%
Net revenue from activities in high-climate-impact sectors (million EUR)	6,273	5,943	+6%
Total GHG emissions (location-based) per net revenue (million tCO <sub>2</sub> e/1000 million EUR)	2.49	2.10	+18%
Total GHG emissions (market-based) per net revenue (million tCO <sub>2</sub> e/1000 million EUR)	2.49	2.10	+18%

- The 18% increase in GHG emissions per unit of net revenue in 2024–2025 was driven by three main factors:
- Revenues: although total revenue rose by 5.6% compared to the previous year, this was due to a 17.3% increase in deliveries, while average prices declined.
  - Production surge: crude steel production increased sharply by 41% following the restart of Blast Furnace 6. This surge, well above the growth in deliveries within the reporting period, was the main contributor to higher GHG emissions.
  - Efficiency gains: GHG emissions per tonne of crude steel fell by 11%, thanks to improved efficiency from a higher overall output.

**Looking ahead**  
We have started the biggest transition in the history of our company, a project that will see us transform an area the size of 60 football pitches at TSIJ and take the first major steps towards net-zero CO<sub>2</sub> emissions in 2045 (Scope 1 and 2). Within a few years, this project will drastically change the operations and skyline of the IJmuiden site.

**New Zeremis® product offerings**

**Scope**  
Zeremis® Carbon Lite aims to reduce production-linked CO<sub>2</sub> emissions and therefore relates to Scope 1 and Scope 2 emissions.

**Actions**  
*Zeremis® Carbon Lite*  
Our Zeremis® brand represents TSN's journey towards a carbon-neutral, more circular world. The brand introduces several reduced-CO<sub>2</sub> and circular steel propositions, the first of which, Zeremis® Carbon Lite, was launched in 2022. It helps our customers achieve Scope 3 CO<sub>2</sub> savings based on our measured and assured Scope 1 and 2 CO<sub>2</sub> emission reduction projects.

Zeremis® Carbon Lite is a mass-balanced insetting scheme (see the diagram on this page), enabling the decarbonisation of our customers' supply chain. CO<sub>2</sub> savings realised from our carbon reduction projects are all independently checked and assured against a baseline set by Det Norske Veritas (DNV GL). The assurance statement, describing the exact project details and project results, and CO<sub>2</sub> savings go into our carbon bank, which is then available for our sales team to sell to customers. GHG reductions apply within the direct value chain, so the CO<sub>2</sub> savings occur in the process route related to the product purchased.

At TSN, we strive to address climate change and accelerate the transition to low-CO<sub>2</sub> steel. We recognise the urgency of taking immediate action to reduce CO<sub>2</sub> emissions. By offering Zeremis® Carbon Lite declarations as an additional option for purchase alongside steel orders, we enable our customers to effectively demonstrate a reduced carbon footprint in their product value chain (Scope 3) to their customers in turn.

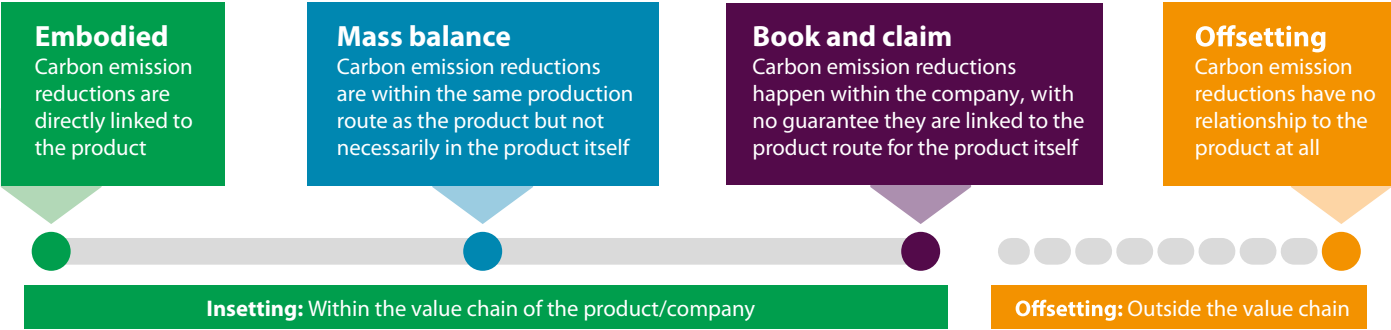
Our Zeremis® Carbon Lite declarations are independently assured by DNV, guaranteeing unbiased allocation of the CO<sub>2</sub> savings to Zeremis® Carbon Lite and preventing double counting. All certified CO<sub>2</sub> savings are additional within the system boundaries of our value chain.

*Zeremis® Delivered*  
Building on the Zero Carbon Logistics programme, in 2024 TSN launched a new service called Zeremis® Delivered, introducing a broad range of low-emission logistics solutions across different modalities. This declaration-based solution delivers a reduction in CO<sub>2</sub>e intensity, using sustainable alternatives to conventional fuels such as HVO100 (vegetable oil) biofuel and green electricity. To support this, we have introduced a broad range of low-emission logistics solutions including biofuel, battery electrification and fuel cell technologies.

Since August 2024, 80% of TSN's rail transports in Europe have been CO<sub>2</sub> neutral due to the application of green electricity. Furthermore, barges sailing into Belgium and France via barge lanes and into the United Kingdom (UK), Iberia and Scandinavia via short sea lanes use biofuel/ HVO. From March 2025, the programme has been extended from a 300-km radius to all customer transport, mainly using HVO100 trucks.

*Zeremis® Recycled*  
We are accelerating our journey to a circular world by making a structural change to the level of recycled content used in our steel, without compromising quality. Increasing the recycled content in our products cuts our Scope 1 emissions.

Zeremis® Recycled is a new proposition developed to help customers meet their circularity targets and reduce their carbon footprint. This mass-balanced solution enables the customer to achieve up to 30% recycled content and make a significant contribution to the circular economy by ensuring high-value scrap is returned as an advanced



steel product. Zeremis® Recycled also offers carbon credits, generated through the increased use of scrap in the steelmaking process and the associated CO<sub>2</sub> reductions. These reductions and the percentage increase in scrap use are independently assured by DNV to ensure single counting between the numbers declared in our environmental product declarations (EPDs) and the recycled content bank.

**Looking ahead**  
As well as Zeremis® Carbon Lite, TSN will also offer its customers the option of securing the Zeremis® embodied reduced-CO<sub>2</sub> steel that will become available when TSIJ transitions to low-CO<sub>2</sub> steel production. In the reporting year, TSN signed memoranda of understanding (MoUs) with various customers in the automotive, engineering, packaging and construction sectors.

**Additional CO<sub>2</sub> savings**

**Scope**  
These initiatives aim to reduce our emissions across Scope 1, 2 and 3.

**Actions**  
*Repurposing residual gases*  
TSIJ cooperates closely with the nearby Vattenfall power plants. Residual gases from steel production are used to generate most (if not all) the electricity needed.

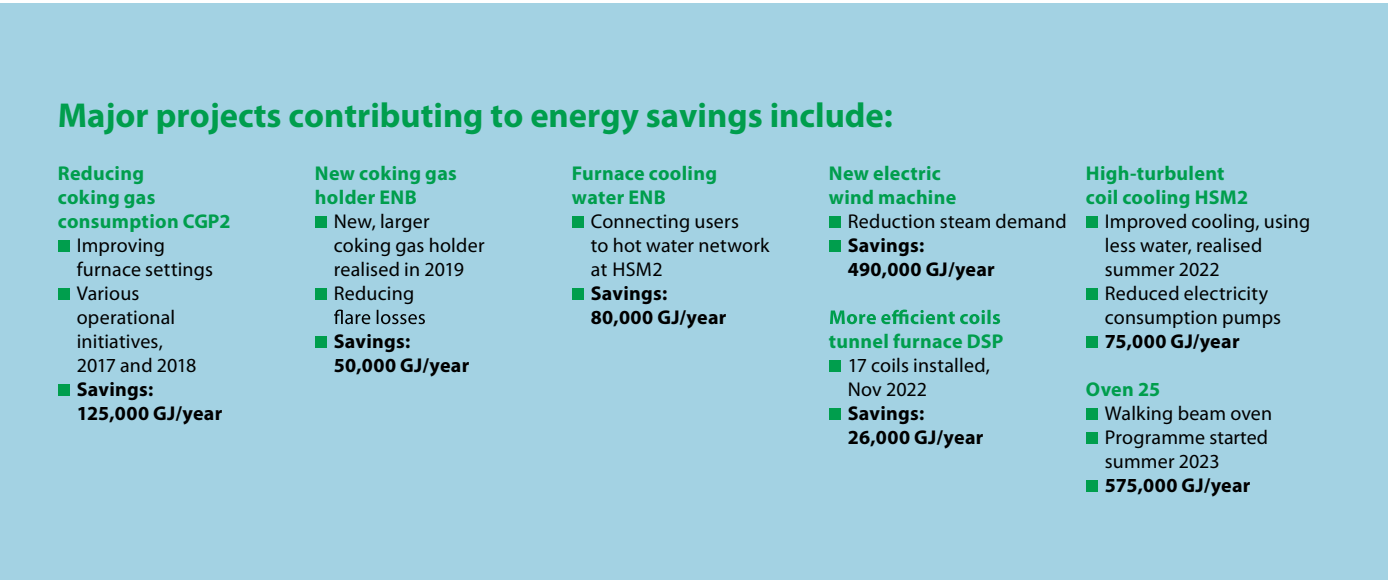
The integrated nature of TSIJ allows the various residual gases to be deployed in the most efficient ways, such as blast furnace gas used to pre-heat the air for the blast furnaces, and coke oven gas for the reheating furnaces at the hot strip mill. In this way the use of supplemental natural gas for heating purposes can be minimised. Heat is recovered to increase process efficiency and generate steam, reducing the need for fuel in steam boilers. The rest is converted into electricity. Vattenfall generates about 2.0 TWh of electricity from residual gases, which is equivalent to the electricity consumption of over 823,000 households.

*Energy-saving measures*  
TSN is constantly improving the energy efficiency of motors, steam systems, furnaces and other assets on the IJmuiden site and in TSDE operations. Since 1989, TSIJ has reported on average ~1% energy savings per year compared to the baseline, yielding a >35% improvement in energy efficiency.

In 2024, TSN started collaborating with provincial authorities on energy efficiency. Under the energy-saving obligation issued by the Netherlands Enterprise Agency and effective from 1 January 2023, all energy-saving measures with a payback period of less than five years must be implemented.

We approach energy savings on a project basis. In alignment with the Environmental Agency of the North Sea Canal Area (EA), TSIJ has developed an energy savings agenda for 2024–2027, yielding more than 50 projects across the site. During the financial year 2024–2025, TSN saved 35,000 GJ of energy, equivalent to 9.7 million kWh, or the electricity consumption of more than 4,000 households. Together, our two largest projects – combustion air optimisation at the hot strip mill and the expansion of the waste-heat net at the Energy department – led to 17,000 GJ of energy savings. Other energy savings are the result of measures including the optimisation of motor systems (pumps and fans), new locomotives for on-site transport and an improvement in the scheduling of steel coils, saving steam at pickling lines.

TSN is further exploring the reuse potential of waste heat, including the application of ‘heat to power’ technology and the further expansion of our recovered heat network.



*Downstream CO<sub>2</sub> emission reductions*  
Compared to the TSIJ integrated steelmaking site, the total Scope 1 emissions from TSDE are minor, accounting for only 1% of TSN's total emissions.

When looking solely at the TSDE operations, some processes are more emission intensive than others. The TSDE sites also contribute to TSN's ambition to reach net-zero by 2045 (Scope 1 and 2). In 2024, the Gelsenkirchen site (Germany) and the sites in Geldermalsen and Maastricht in the Netherlands all became CO<sub>2</sub> neutral, joining those in Naantali (Finland) and Halmstad (Sweden), which had already achieved this before 2024.

Each location has completed an inventory of its CO<sub>2</sub> emissions and either has implemented or is preparing its own CO<sub>2</sub> reduction programme. These programmes include electrifying logistics, using HVO and generating energy through solar panels and wind turbines. While each site has unique programmes and challenges, they share best practices to accelerate progress.

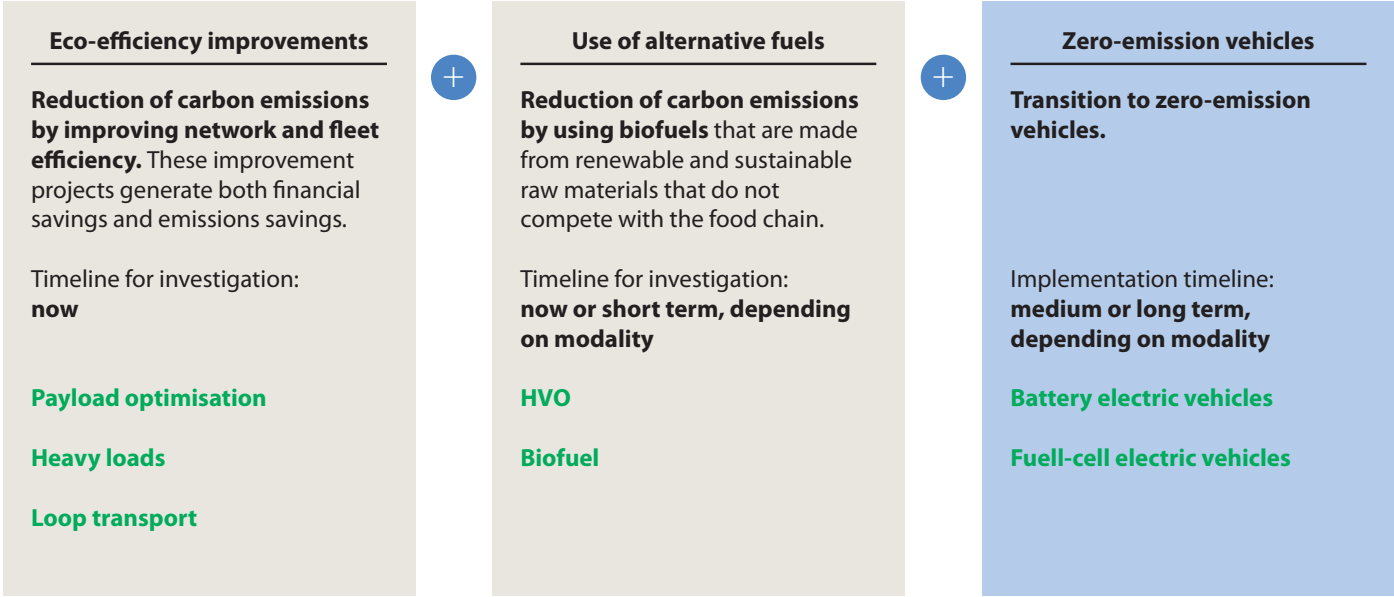
*Zero Carbon Logistics*  
Inbound and outbound logistics are strategically important to TSN and contribute to our Scope 1 and Scope 3 emissions. This includes emissions from transporting raw materials to our production site in IJmuiden (inbound logistics), transporting materials from IJmuiden to all TSDE locations and distributing finished steel products to customers (outbound logistics). Optimising logistics and using sustainable mobility options are key to reducing GHG emissions. To support this, TSN has implemented a Zero Carbon Logistics programme for its European Union (EU) operations.

The programme aims to reduce logistics emissions by 30% by 2030 compared to the 2019 baseline, and to achieve carbon-neutral transport by 2045. We are focusing on improving logistics networks, fleet efficiency and energy efficiency through three strategic initiatives:

- Eco-efficiency improvements from optimising payloads and loop transport.
- Use of alternative fuels such as HVO and biodiesel.
- Transition to low-emission vehicles (battery and fuel-cell electric vehicles).



Short- and long-term actions to reduce carbon emissions



- Key actions under the Zero Carbon Logistics programme include:
- Using the Global Logistics Emissions Council Framework for emissions reporting. This makes TSN the first steel company in the world to adopt this framework, which enables comparisons between different logistics modalities and identification and improvement of emission hotspots.
  - Implementing HVO100 for truck movements to all customers, applying the book and claim approach. We now have two large and two small carriers using HVO in their trucks, with one of these carriers saving 2,716 tonnes of CO<sub>2</sub>e in the 2024 calendar year as a result of the transition from fossil fuel to HVO100.
  - Replacing road transport with the more carbon-efficient rail and barge transport, where applicable. Our barges run on biofuel and the rail network operated by DB Cargo is powered by renewable electricity.
  - Collaborating with value chain partners to explore and pilot net-zero solutions. As well as being a member of the Sustainable Freight Buyers Alliance, we are investigating emissions-free shipping using modular energy containers on our barge shipping lanes.

Performance  
Energy consumption and mix<sup>1</sup> unaudited/no assurance

	TSIJ		TSDE <sup>1</sup>		TSN Group	
Energy consumption and mix	FY2024/25	FY2023/24	FY2024/25	FY2023/24	FY2024/25	FY2023/24
Fuel consumption from coal and coal products (GWh)	30,247	23,215	0	0	30,247	23,215
Fuel consumption from crude oil and petroleum products (GWh)	29	20	0	1	29	21
Fuel consumption from natural gas (GWh)	3,011	2,984	464	465	3,475	3,449
Fuel consumption from other fossil sources (GWh)	0	0	2	1	2	1
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (GWh)	0	423	56	60	56	483
Total fossil energy consumption (GWh)	33,286	26,643	521	527	33,808	27,170
Share of fossil sources in total energy consumption	100%	100%	79.6%	79.7%	99.6%	99.5%
Consumption from nuclear sources (GWh)	0	0	124	132	124	132
Share of consumption from nuclear sources in total energy consumption	0%	0%	18.9%	19.9%	0.4%	0.5%
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) (GWh)	0	0	0	0	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (GWh)	0	0	10	3	10	3
Consumption of self-generated non-fuel renewable energy (GWh)	0	0	0	0	0	0
Total renewable energy consumption (GWh)	0	0	10	3	10	3
Share of renewable sources in total energy consumption (%)	0	0	1.5	0.4	0.0	0.0
Total energy consumption (GWh)	33,286	26,643	655	661	33,941	27,304

<sup>1</sup> Material sites accounting for 90% of TSDE's energy consumption. TSN Group's reported consumption represents 99.7%.

In 2024–2025, TSN's energy consumption rose due to a 40% increase in liquid steel production, leading to higher use of coal and coal products at the IJmuiden site. However, the additional energy generated more works-arising gases, which were repurposed for on-site electricity generation by Vattenfall. As a result, no external electricity was purchased in IJmuiden.



Energy intensity

unaudited/no assurance

Energy intensity per net revenue	FY2024/25	FY2023/24	%FY(2024/25) / FY (2023/24)
Total energy consumption from activities in high-climate-impact sectors (MWh)	33,941	27,304	+24%
Net revenue from activities in high-climate-impact sectors (million EUR)	6,273	5,943	+6%
Total energy consumption from activities in high-climate-impact sectors per net revenue from activities in high-climate-impact sectors (GWh/million EUR)	5.4	4.6	+18%

Climate risk assessment

In 2024, global temperatures exceeded 1.5°C above pre-industrial levels for the first time. The Intergovernmental Panel on Climate Change (IPCC) warns this rise may intensify heatwaves, storms, droughts and sea level rise, affecting ecosystems, human health and economies worldwide. TSN operates sites in Europe and the United States of America (USA) that could be vulnerable to these extreme weather events. We recognise the need to assess climate-related physical and transition impacts, risks and opportunities to ensure business resilience. In 2023, we partnered with external experts to assess these risks at our IJmuiden site. As part of our roadmap for Corporate Sustainability Reporting Directive (CSRD) compliance, this assessment will be further refined and integrated with our enterprise risk management (ERM) framework.





# Definitions of climate change KPIs

KPI	Definition
Green House Gas Emissions	
Gross scope 1 GHG emissions	Emissions resulting from activities that are directly owned or controlled by the organisation. These include: <ul style="list-style-type: none"><li>• Emissions from production processes.</li><li>• Emissions from the near-site Vattenfall power plant where residual gases from our processes are combusted to generate power for our consumption.</li><li>• Emissions from stationary and mobile on-site combustion sources, such as those using natural gas, petrol, diesel and other fuels.</li></ul>
Gross scope 2 GHG emissions – location based	Emissions from purchased electricity, heat and steam. In 2024–2025, only TSDE entities incurred these emissions, as TSIJ met its electricity needs through self-generation. In the previous year, TSIJ did purchase electricity. Emissions are calculated using location-based national emission factors.
Gross scope 2 GHG emissions – market based	Emissions from purchased electricity, heat, and steam. In FY 2024/25, only downstream entities incurred these emissions, as TSIJ met its energy needs through self-generation. In the prior year, TSIJ did purchase electricity. Emissions are calculated using market-based factors where contractual agreements are available, and location-based factors otherwise.
Gross scope 3 GHG emissions	<p>Indirect emissions from activities in our upstream and downstream value chain are reported in accordance with the GHG Protocol Corporate Value Chain (Scope 3) Standard (2011) and its supplement Technical Guidance for Calculating Scope 3 Emissions (2013). A comprehensive screening of our value chain was conducted to identify material and relevant categories, which are disclosed in this report. Our total Scope 3 emissions include key categories such as:</p> <p>Category 1: Purchased Goods and Services Category 2: Capital Goods Category 3: Fuel- and Energy-Related Activities Category 4: Upstream Transportation and Distribution Category 5: Waste Generated in Operations Category 6: Business Travel Category 7: Employee Commuting Category 9: Downstream Transportation and Distribution Category 10: Processing of Sold Products Category 12: End-of-Life Treatment of Sold Products</p> <p>Emission calculations are based on category-specific emission factors sourced from databases and organisations such as ecoinvent, GaBi, DEFRA, Worldsteel and RMI, depending on data availability and relevance. For category 1, supplier-specific emission factors are used where available.</p>
GHG emissions – Scope 1, 2 and 3 (WSA)	To benchmark the emission intensity of steel production, TSN also reports Scope 1, 2 and 3 emissions in alignment with the WSA guidance per tonne crude steel, including credits. Within the WSA modelling, emission intensity is primarily assessed at the product level. Although steel production emissions are included in the model, the main focus is on product-based emission intensities for benchmarking purposes.

KPI	Definition
GHG intensity	GHG intensity refers to the total GHG emissions (Scope 1, 2 and 3) emitted by TSN per unit of net revenue according to the GHG Protocol. It is expressed in million tonnes of CO <sub>2</sub> equivalent per 1,000 million EUR of revenue.
Energy consumption and mix	
Fuel consumption from coal and coal products (MWh)	This category includes fuel consumption from coal-based sources such as coking coal, injection coal, anthracite, total breeze and coke (excluding petroleum coke). A portion of the energy derived from coal is not consumed onsite but is instead exported in the form of tar or benzole, and is therefore excluded from this category.
Fuel consumption from crude oil and petroleum products (MWh)	This category includes fuel consumption from benzine, gasoline, petroleum coke and gas-to-liquid (GLT) fuels.
Fuel consumption from natural gas (MWh)	Includes fuel consumption in the form of natural gas for production processes and and energy for heating.
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	Purchased energy in the form of electricity, heat and steam. For TSIJ, only electricity is purchased – and only in cases where self-generation falls short. This occurred in FY 2023/24, but no electricity was purchased in 2024–2025. TSIJ does not purchase heat, steam, or cooling. For TSDE, purchased energy includes electricity, heat and steam.
Total fossil energy consumption (MWh)	This includes all energy derived from fossil sources, such as: <ul style="list-style-type: none"><li>• Coal and coal products</li><li>• Crude oil and petroleum products</li><li>• Natural gas</li><li>• Purchased electricity, heat and steam generated from fossil fuels</li></ul>
Share of fossil sources in total energy consumption (%)	This represents the percentage of total fossil energy consumption – including coal, crude oil, petroleum products, natural gas and purchased electricity, heat and steam from fossil sources – relative to TSN’s total energy consumption.
Consumption from nuclear sources (MWh)	Includes energy consumed from nuclear sources, primarily applicable to TSDE locations.
Share of consumption from nuclear sources in total energy consumption (%)	Represents the percentage of nuclear energy consumption, relative to TSN’s total energy consumption.
The consumption of self-generated non-fuel renewable energy (MWh)	This includes renewable energy generated on site by TSN, specifically from solar energy sources.
Total renewable energy consumption (MWh)	The total energy consumed from renewable sources.
Share of renewable sources in total energy consumption (%)	Represents the percentage of renewable energy consumption, relative to TSN’s total energy consumption.
Total energy consumption (MWh)	Represents the sum of all energy consumed by TSN from fossil fuels, nuclear sources and renewable energy (including self-generated and purchased).

Pollution

Why this topic matters

At TSN, we are conscious that our activities have an impact on local communities and the wider environment. We are therefore transforming our business to reduce this impact.

The risk of air and water pollution is inherent in steel manufacturing. Our production processes release various pollutants – including nitrogen oxides (NOx), sulphur dioxide (SOx), particulate matter and heavy metals – into the air and water, which may have an impact on the environment.

The regulatory landscape for steel manufacturing is evolving, meaning that steel companies must continuously monitor and adapt to new legislation, regulations and frameworks. TSN is committed to complying with EU and local environmental regulations.

TSN operates under various environmental permits under local and European regulatory frameworks. At the same time, we are mindful of the environmental impact of our operations. By transitioning to new technologies and processes and cleaner energy sources, TSN aims to minimise reliance on fossil fuels. In addition, this will reduce emissions of harmful pollutants such as NOx, SOx, particulate matter and heavy metals at our key production site, TSIJ.

As part of our ongoing commitment to environmental responsibility, we also place emphasis on pollution reduction within our supply chain. In line with our Responsible Supply Chain Policy, we expect our supply chain partners to comply with applicable environmental laws and industry standards.

Our process for identifying material topics is outlined in the chapter General disclosures. Through our double materiality assessment (DMA), we have identified three material sub-topics related to pollution: air; water and soil; and substances of (very high) concern. We discuss each of these in this chapter.

How we manage this topic

Approach

As part of our sustainability goals, we aim to produce steel in a future-proof, cleaner manner. To this end, in recent years, TSN has achieved reductions in its environmental impact as a result of improvements made under the Roadmap programme. Further improvements are underway, and we continue to engage with local residents, authorities, companies and other organisations to ensure that we are focusing on the right areas to minimise our impact on others in the community. This dialogue with the community is further discussed in chapter Affected communities in the IJmond region.

We conduct investigations into soil, groundwater, residues, water, odour, air and noise across all TSN sites, including our TSDE locations where applicable, to identify material pollutants and their impacts. Due to the scale of operations and high-impact activities in IJmuiden, the impacts are primarily concentrated there.

TSN regularly assesses its business activities to evaluate potential effects on air, water and soil, following TSN policies and internal standards according to our environmental management system. To ensure the independent measurements required for licensing authorities and environmental programmes, we employ accredited specialists to measure pollution impacts across all plants.

For the material pollutants identified, TSIJ maintains a strong focus on compliance with EU and national environmental laws, where prescribed emission ranges for several processes are laid down in best available techniques reference documents (BREFs). Each BREF permit revision is internally reviewed and subsequently confirmed by the relevant competent authority. In the Netherlands, stricter regulations are outlined in the Environmental Act (Omgevingswet).

In accordance with the European Pollutant Release and Transfer Register (EU-PRTR), TSN must submit data annually to the relevant authority. We are obliged to prepare an electronic environmental annual report (e-MJV) covering air emissions, waste management, environmental management systems, discharges to surface water and other related areas. TSN currently reports on pollutants to air and water under EU-PRTR and will prepare to report on soil pollutants in the future.

For substances of (very high) concern, the Netherlands sets stricter limits and conditions than European regulations such as REACH. There are more than 3,000 substances of very high concern and around 400 potential substances of very high concern identified by the RIVM. We act to limit the discharge of these substances into air and water according to the minimalisation obligation and we report on this to the environmental authorities every five years.

For our upstream value chain, we use an environmental, social and governance (ESG) questionnaire to collect and monitor relevant pollution information from our suppliers.

*Roadmap programme*  
TSN places a strong emphasis on reducing material pollutants, such as NOx, SOx, particulate matter, polycyclic aromatic hydrocarbons (PAHs), lead, dust, odour and noise. In IJmuiden, our Roadmap programme is dedicated to enhancing local environmental performance associated with these pollutants. We have invested more than EUR 300 million in key actions, the majority of which have already been implemented. A few remaining measures are currently in progress (see Roadmap diagram below). In addition, we are actively working to mitigate emissions by applying strict operational controls, leveraging advanced data analytics and refurbishing oven walls at our CGPs. Here, we elaborate further on our key actions to control and reduce air, water and soil pollution.

Pollution of air

Scope

This sub-topic covers our key production site in IJmuiden.

Actions

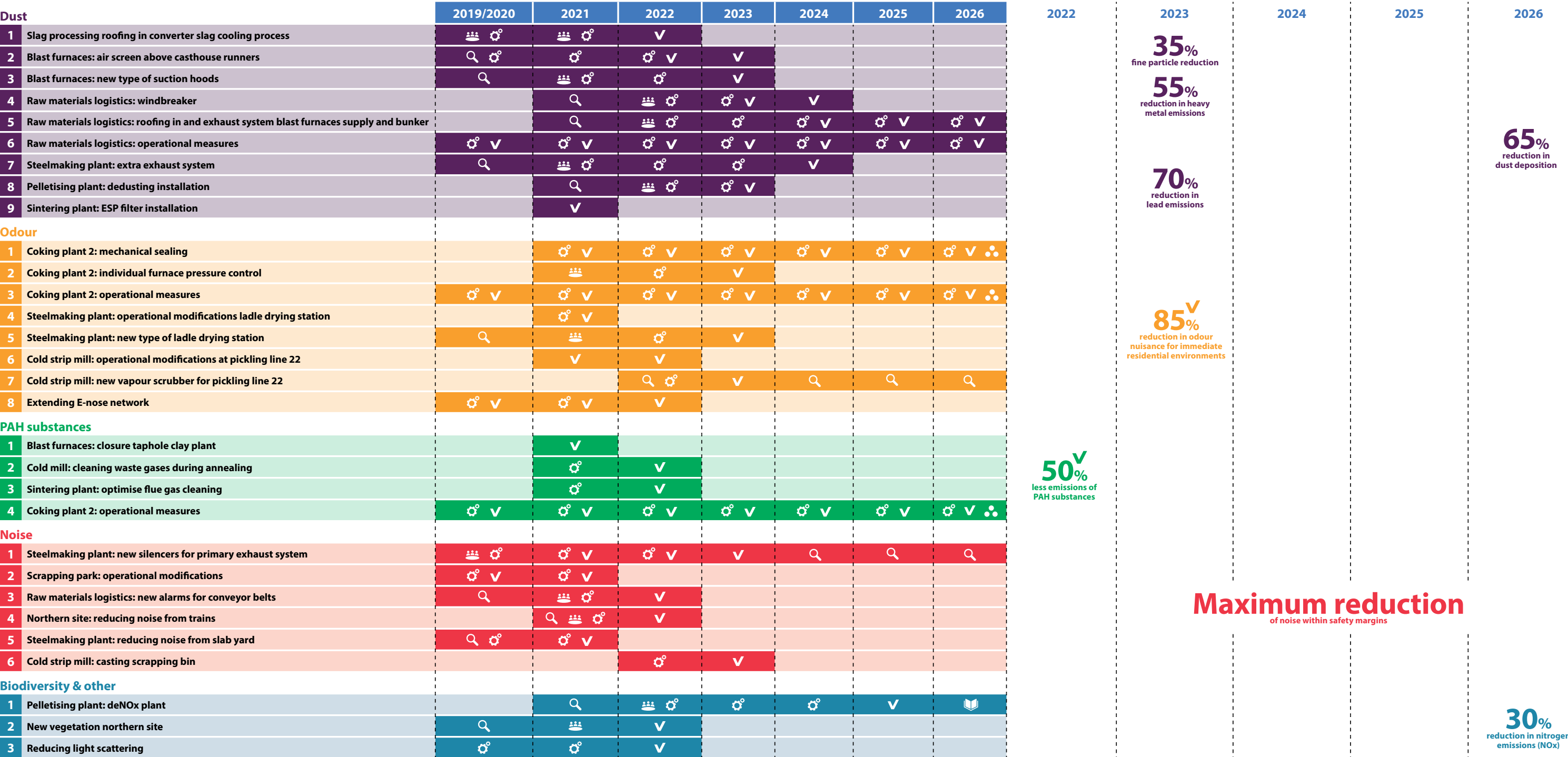
The Roadmap programme in IJmuiden is in its final stages and focuses on improving local environmental performance. It addresses emissions such as NOx, SOx, heavy metals, lead and particulate matter, PAHs, dust deposition and odour.



Roadmap: Moving faster towards a better living environment

Version: June 2025

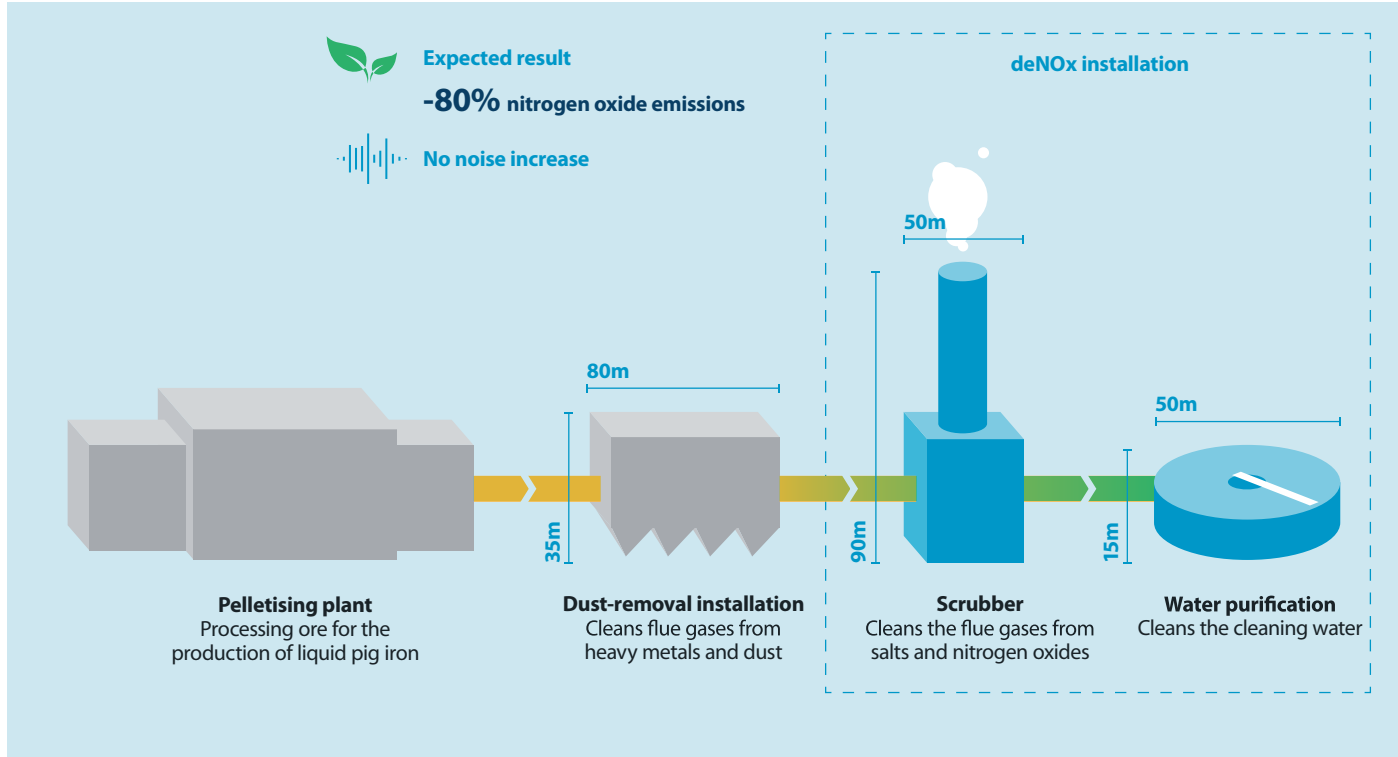
Commissioning Ongoing Being investigated In preparation Being implemented Realised



**Commissioning:** The process of testing and verifying that a system or installation functions according to design specs and is ready for operation. **Ongoing:** in addition to the realised projects of the Roadmap programme, it was decided to continue improving. These are the additional projects, which are not part of the Roadmap programme (RM+ a 300M€). **Being investigated:** A potential solution is being investigated for feasibility, cost, technical performance, implementation and effectiveness over time. **In preparation:** we organize logistics, mobilize resources and prepare the site and team for the implementation phase. **Being implemented:** project realised and results (KPI Roadmap programme) not yet validated. **Realised:** project realised and results (KPI Roadmap programme) positively validated. The aforementioned results are based on expected decreases compared to 2019. To verify these decreases, we will need to take several measurements. Measurement will also take place in 2025 and therefore verification will also occur in the year 2025. \*We have taken measurements at three sources that emit significant PAHs (the auxiliary plant, cold strip mill and sinter plant). PAH emissions at those three factories have decreased by more than 50% in 2022 compared to 2019.

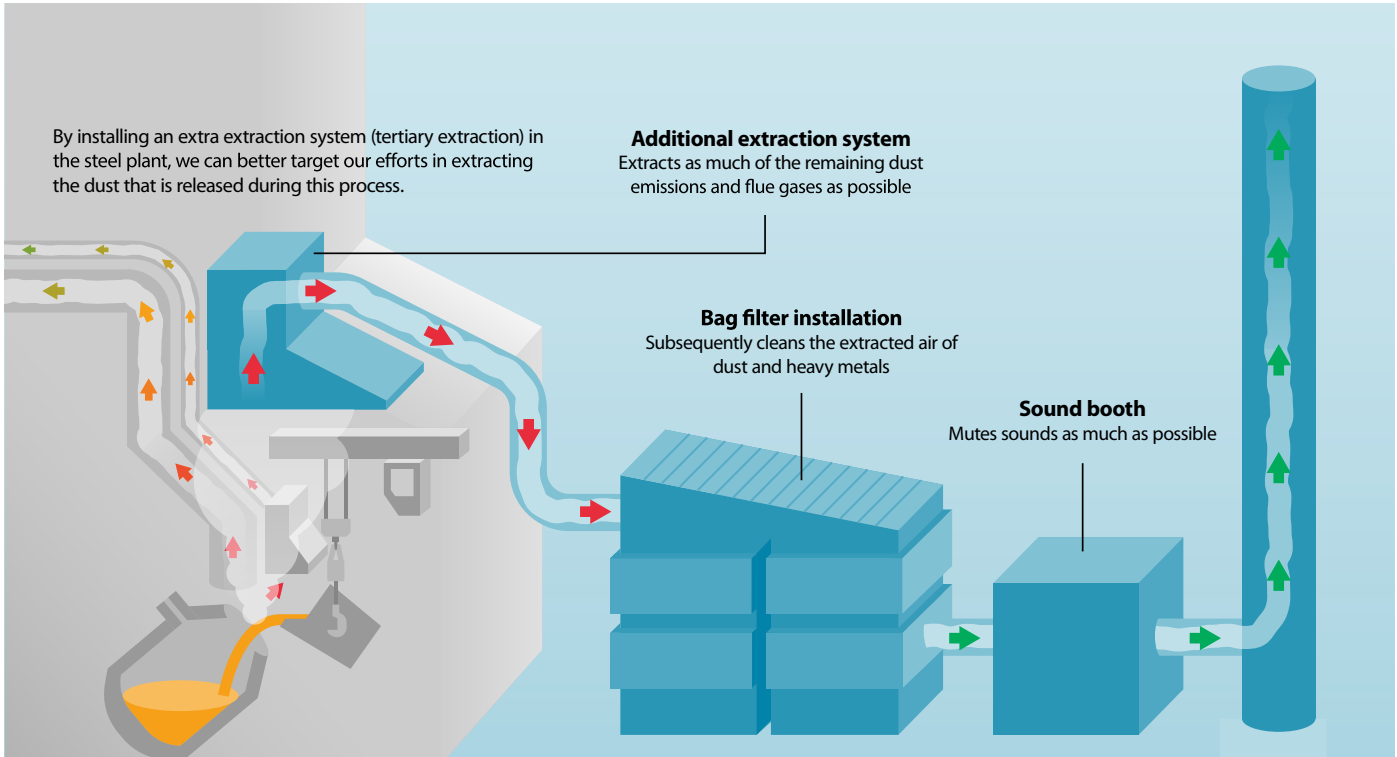
*Nitrogen oxide*  
Goal as defined in the Roadmap programme: NOx emissions reduced by around 30% by 2025.

We are committed to further reducing our NOx emissions. In 2024, TSN started the construction of a new deNOx installation at the pellet plant and the renewal of the water purification system. When the installations are complete, they will be connected to the dedusting plant that was commissioned in 2023, reducing our NOx emissions at the pellet plant by around 80%. The installation is projected to be operational once all the right permits are in place, with testing to start by the end of 2025.



*Heavy metals, lead and particulate matter*  
Goal as defined in the Roadmap programme: By the end of 2023, heavy metals to be reduced by around 55%, lead by around 70% and particulate matter by around 35%. The results are being validated by external agencies.

Emissions of particulate matter and heavy metals (including lead) have been reduced by various measures we have taken in recent years. We anticipate further positive results in the coming years now that three major installations have been commissioned: the dedusting installation at the pellet plant, the six additional forge hoods at the blast furnaces and the additional extraction hood at the steel plant.





*Polycyclic aromatic hydrocarbons*

Goal as defined in the Roadmap programme: Reduction in PAH emissions by around 50% at the three largest emission sources – cold strip mill, sinter plant and blast furnaces – by 2022. Emissions decreased by more than 50% between 2019 and 2022.

All Roadmap programme measures to reduce PAHs have been completed, with the main changes implemented at the cold strip mill and sintering plant. These followed previous adjustments to the blast furnace production process.

Emissions at the doors of the furnaces of CGP2 have decreased sharply. We have agreed with the EA that TSIJ will continue with the agreed operational measures for CGP2 to further reduce PAH emissions.

*Dust deposition*

Goal as defined in the Roadmap programme: 65% reduction of TSN-induced deposition of visible dust (solid particles) in Wijk aan Zee by 2024.

TSN has taken several measures in recent years to reduce dust deposition in the area around TSIJ. In October 2024, we finished building a windbreaker screen approximately 18 metres high and 1 km long around the coal stockpiles, thereby reducing wind speeds and associated dust dispersal. Other projects now being implemented include scrapers at conveyor belts, operational dust prevention measures at the raw material logistics department and the use of atomised water at the bunker discharge in the blast furnace stockhouses. We are currently measuring the effects of these steps.

*Odour*

Goal as defined in the Roadmap programme: Reduction by approximately 85% of the number of hours that local residents experience unpleasant odours by the end of 2023.

All Roadmap programme measures for odour reduction have been implemented. TSN has significantly reduced odour emissions at CGP2 thanks to various operational measures; for example, by overhauling the coke chambers and oven pressure control. We have also reduced odour emissions by approximately 50% when heating steel ladles in the steel plant and installed a vapour scrubber at Pickling Line 22.

At various measurement locations, the number of hours during which these odours are perceptible has even fallen by more than 85% compared to 2019.

As agreed with the EA, we are implementing more operational measures at CGP2 aimed at further reducing odour emissions.

**Performance**

Historically, TSN has reported emissions on a calendar-year basis to meet permit requirements. As part of our CSRD roadmap efforts, we are transitioning to financial-year reporting.

In 2024-2025, absolute emissions of NOx, SOx and dust increased due to higher production volumes, while emission intensity per tonne of crude steel declined.

**Looking ahead**

*Green Steel Plan*

As discussed in the chapter Climate change, from this reporting year TSN is committed to transitioning towards low-CO<sub>2</sub> steel production. This transition – known as the Green Steel Plan – is a cornerstone of our sustainability strategy and will also have significant effects on mitigating the negative impacts of air pollution. The use of fossil fuels in our current processes is a major contributor to carbon emissions and air pollution. By adopting new technologies and processes as well as cleaner energy sources, we aim to minimise our reliance on coal. This will in turn reduce emissions of pollutants such as NOx, SOx and particulate matter from our TSIJ operations.

TSN aims to reduce its emissions in the priority areas of particulate matter and noise through the following extra measures:

- Covering the raw material fields related to the DRP and EAF route to reduce dust and particulate matter emissions
- Covering the scrap yard to reduce noise emissions
- Extending the noise-monitoring system to address tonal and peak noises

Implementing these measures will help TSN exceed current legal requirements, with progress depending on government support for the Green Steel Plan. The detailed impact of the Green Steel Plan is described in a separate EIA, which is due to be submitted to the competent authority in the summer of 2025. A summary of this report will be made public at the same time.

**Pollution of water and soil**

**Scope**

This sub-topic covers our key production site in IJmuiden.

**Actions**

*Water pollution*

Most of the water-borne pollutants emitted in our operations are treated at various water treatment plants at TSIJ before the wastewater is discharged into the sea. There is a defined list of key pollutants that may negatively impact the environment, and TSIJ has measures in place to control the discharge of these components while operating within the permitted limits. TSIJ is legally required to report annually about the emission of pollutants to various governmental agencies, including details about its wastewater discharge to surface water.

All the wastewater generated through our processes undergoes appropriate treatment including (but not limited to) oil skimming, sand filtration, biological treatment and chemical treatment. The nature of treatment depends on the composition of the wastewater. Furthermore, the quantity of components that we emit is also measured at each of our discharge measuring points for monitoring and reporting purposes. We maintain a detailed list of the type(s) of water treatment that wastewater is subjected to at each discharge point. We report on our pollutant quantities each year in our [e-MJV](#), in accordance with the EU-PRTR .

One of TSIJ’s largest water treatment plants is the BIO2000, which incorporates biological treatment (including aeration and settling zones) and sand filtration. In the near future, when the deNOx installation at the pellet plant is installed, TSN aims to streamline its water treatment facilities and address the nitrogen emitted through its wastewater. We therefore plan to upgrade the BIO2000 with the addition of a new CombiBio installation. The new system will include a denitrification step to remove nitrogen compounds from the wastewater along with filtration of suspended particles and associated contaminants. The goal is to remove as many heavy metals as possible. The benefit of this new installation is that it would combine different existing and new wastewater streams and treat the effluent more effectively. This more robust system will improve wastewater treatment, reduce the amount of (added) chemicals and decrease energy expenditure. This will help to reduce TSIJ’s environmental impact related to water discharges (see chapter Water and marine resources).

*Soil pollution*

We are subject to environmental regulations that mandate soil protection measures, requiring immediate remediation of soil contamination and record-keeping of relevant data. TSN has a detailed protocol in place for managing such situations.

In the event of soil contamination, we act immediately to report the incident and develop remedial measures. Clean-up is performed by approved companies and samples are provided to our Waste Management department along with an incident report. Follow-up actions, including further investigation or excavation, are conducted in consultation with competent authorities.

Air pollution – TSIJ			unaudited/no assurance
Air pollutants (reported by calendar year)	CY2024	CY2023	% CY2024 / CY2023
NOx (nitrogen oxides) (tonnes)	5,065	4,254	+19%
NOx (nitrogen oxides) intensity (kg/tonnes of crude steel)	0.79	0.90	-12%
SO <sub>2</sub> (sulphur dioxide)	2,883	2,880	+3%
SO <sub>2</sub> (sulphur dioxide) intensity (kg/tonnes of crude steel)	0.45	0.59	-24%
Dust	1,498	1,432	+4%
Dust intensity (kg/tonnes of crude steel)	0.23	0.31	-26%

# Definitions of pollution KPIs

Performance  
Water pollution – TSIJ unaudited/no assurance

Water pollutants (tonnes) (reported by calendar year)	CY2024	CY2023	% CY2024 / CY2023
Hydrocarbons	0.98	1.16	-16%
Suspended solids	282	338	-17%
Chemical oxygen demand (COD)	532	516	+3%

The total discharge of suspended solids in 2023 was higher than usual, but 2024 levels returned to the expected range, mainly due to reduced saltwater use and process changes at Blast Furnace 7 granulation.

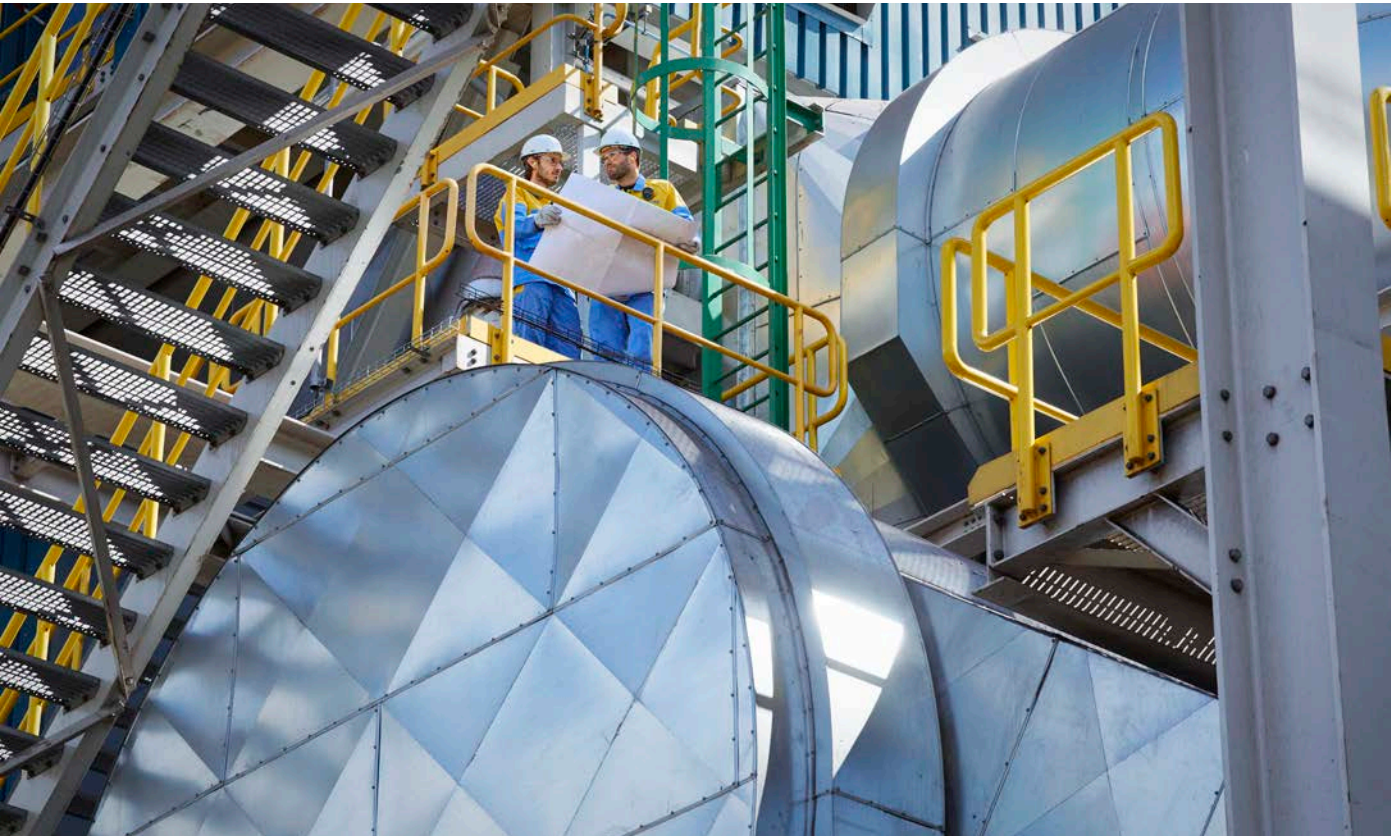
### Pollution upstream

#### Actions

In our upstream value chain, we monitor and support initiatives aimed at minimising harmful emissions, solid waste and wastewater discharge. TSN urges partners to implement practices that optimise the use of natural resources and mitigate negative environmental impacts throughout the life cycle of their operations and products.

For example, effective tailings management in mining is essential to prevent environmental contamination, protect water and soil quality and reduce the risk of tailings dam failures. Suppliers are asked to inform TSN about their tailings management practices and are challenged on these during mine visits by TSN staff.

We pay particular attention to reducing GHG emissions, as well as energy and water consumption. We also promote the use of non-toxic substances and environmentally friendly packaging, favouring recyclable materials and minimising material use where possible.



KPI	Definition
Air pollution	<p>TSIJ reports key air pollutants emitted from its operations, specifically nitrogen oxides (NOx), sulphur oxides (SOx) and dust.</p> <p>These emissions are reported in both absolute values and as intensity per tonne of crude steel produced.</p> <p>The reported emissions represent the sum of emissions calculated for each individual stack on-site. Depending on the type and size of the emission source, one of the following three methods is used:</p> <p><b>Continuous monitoring or calculation</b> Emissions are continuously measured using stack monitors or calculated based on process parameters. Where continuous monitoring is applied, measurements follow the NEN-EN 14181 standard.</p> <p><b>Periodic measurement and extrapolation</b> Emissions are periodically measured by our accredited in-house measurement department or an accredited measurement company. These results are then extrapolated to annual values using relevant process data.</p> <p><b>Estimation or theoretical derivation</b> For smaller or more complex sources where direct measurement is not feasible, emissions are estimated or theoretically derived using established methodologies.</p>
Water pollution	<p>This includes the reporting of key water pollutants discharged from TSIJ operations, pecifically hydrocarbons, suspended solids and chemical oxygen demand.</p> <p>These pollutants are reported in both absolute values and as intensity per tonne of crude steel produced.</p> <p>The reported emissions represent the sum of emissions calculated for each individual stack on-site. Depending on the type and size of the emission source, one of the following three methods is used:</p> <p><b>Continuous monitoring or calculation</b> The flows at most of the discharge-points are measured by measurement equipment or the flow is calculated based on pump-hours and capacity. Components are measured in samples taken by volume (every ‘x’ m³ of discharge) or periodic sampling (every ‘x’ minutes/ hours) equipment or in samples that are taken by hand.</p> <p><b>Periodic measurement and extrapolation</b> Emissions are periodically measured by an accredited measurement company. These results are then extrapolated to annual values using relevant process data.</p> <p><b>Estimation or theoretical derivation</b> For smaller or more complex sources where direct measurement is not feasible, emissions are estimated or theoretically derived using established methodologies.</p>



# Definitions of water and marine resources KPIs

## Water and marine resources

### Why this topic matters

Water plays a crucial role in steel production. We discuss the potential impacts of contaminants and heat in TSN's discharged water, and how we manage these, in the chapter Pollution. In our upstream value chain, meanwhile, water withdrawal and discharge are integral parts of the mining process. This practice can potentially impact the availability and quality of water in arid regions.

Our process for identifying material topics is outlined in the chapter General disclosures. Through our DMA, we have identified two water-related sub-topics as material for TSN: water withdrawals and water discharges. This chapter provides insights into how TSN manages these sub-topics.

### How we manage this topic

#### Approach

TSN uses water responsibly by implementing effective water management and recycling practices. Within our own facilities, we deploy advanced treatment technologies to ensure efficient water use and manage contamination. Besides responsible water use, we manage the quality of discharges to the external environment, ensuring that this stays within the limits in our water permit and applicable regulatory frameworks.

We are also working to better understand water withdrawal and discharge in our upstream value chain. We now include this topic in our supplier questionnaire.

### Water withdrawals and water discharges

#### Scope

This sub-topic covers the primary impacts stemming from water discharges in IJmuiden and from water withdrawals and discharges upstream.

#### Actions

TSN has implemented several initiatives to promote the responsible use of water at our own sites and at upstream mining locations.

#### Water discharge in IJmuiden

A large amount of the water TSIJ withdraws from various sources is used for cooling purposes. It is then discharged into the sea at a higher temperature, which can vary seasonally and annually. This can affect ecosystems and water quality.

#### Water withdrawals and discharge in our upstream value chain

Through the annual ESG Strategic Procurement Questionnaire we send to our suppliers, we are building a clearer understanding of the impacts of our suppliers' freshwater withdrawals and water discharges.

#### Performance

In 2024–2025, TSIJ withdrew approximately 230 million m³ of water from various sources. This was mainly seawater (71%), which we use for indirect cooling, but we also use brackish water, groundwater and some freshwater from the Lek river and the IJsselmeer in our processes. We released approximately 215 million m³ of this water back into the sea. Of our total water withdrawals, around 14% originates from freshwater sources, due to the need for high-quality water for cleaning and direct cooling.

Water withdrawal and discharge – TSIJ      unaudited/no assurance			
Water resources	FY2024/25	FY2023/24	%FY(2024/25) / FY(2023/24)
Total water withdrawal (million m³)	230	204	+13%
Total water discharge (million m³)	215	191	+13%
Withdrawn water discharged to sea	94%	93%	+1%

The amounts presented refer only to our IJmuiden site. Water use at TSDE sites accounts for approximately 2% of TSN's total water use.

The recommissioning of Blast Furnace 6 in 2024–2025, following its closure for maintenance in the prior year, led to a 41% increase in crude steel and 40% in liquid steel production. This increase in production activity contributed to higher water withdrawals and discharges at IJmuiden.

KPI	Definition
Total water withdrawal	This is the total volume of water withdrawn into TSIJ's operations during the reporting period, measured/ calculated in m³. This includes all water sources, such as seawater, brackish water, freshwater, groundwater and drinking water.
Total water discharge	The total volume of water discharged from TSIJ's operations during the reporting period, measured/ calculated in m³. This includes discharges from all water sources previously withdrawn and discharged into the sea.
Percentage of water discharged	Represents the percentage of water discharged relative to what is withdrawn from different sources.

Biodiversity and ecosystems

Why this topic matters

TSN’s own operations and those of our suppliers have an impact on surrounding ecosystems and natural habitats. We therefore evaluate our possible impacts and dependencies on biodiversity and identify methods to reduce these impacts.

TSIJ borders Natura 2000 sites that are designated as special protection zones. Steel production at the site may contribute to biodiversity loss through two primary drivers: climate change and pollution. As discussed in the chapters Climate change and Pollution, TSN is working to reduce these possible impacts and is committed to supporting and enhancing biodiversity at the site.

Steel production also depends on raw material extraction that has an impact on biodiversity and ecosystems in TSN's upstream value chain. Upstream, biodiversity loss may occur as a result of factors such as land-use change, freshwater-use change, sea-use change and pollution.

In our DMA, we therefore identified two material sub-topics: the direct impact drivers of biodiversity loss and the impacts of upstream value chain mining. While we are still at an early stage of addressing biodiversity matters, there are already several initiatives in place to assess, manage and monitor related impacts. In addition, our actions to mitigate climate change and reduce pollution play a crucial role here. This chapter should therefore be read in conjunction with in the chapters Climate change, Pollution, Water and marine resources, Resource use and circular economy and Affected communities in the IJmond region.

How we manage this topic

Approach

In line with our commitment to biodiversity conservation, we are embarking on the initial phase of integrating biodiversity considerations into TSN's operations. This phase entails an evaluation of biodiversity impacts and risks at our sites and in our upstream value chain, in accordance with Tata Steel Limited’s Biodiversity Policy and the relevant environmental regulations.

Embedding and connecting nature

Scope

In scope is biodiversity at TSN sites and in our upstream value chain.

Actions

TSN aims to contribute to foster biodiversity, particularly at our primary production site in IJmuiden, where the majority of impacts from our own operations can be expected. Our biodiversity efforts at TSIJ are shaped by three key initiatives:

- Staalblauwtje (Steel Blue), a comprehensive ecological study conducted in 2018 that focused on the current state of protected nature in TSIJ’s surroundings and the development of biotopes, water systems and types of green areas.
- Tata Steel Limited’s Biodiversity Policy, which aims to preserve, enhance and restore biodiversity within its operational areas.
- Species inventories conducted across TSIJ in 2015, 2017, 2019 and 2023, identifying the types of flora and fauna found at the TSIJ site with its unique coastal dune habitats.

Biodiversity in IJmuiden

In the Netherlands, ecological protection, including the natural environment surrounding the site at IJmuiden, is governed by legislation initially established in the Nature Conservation Act and integrated into the Environmental Act as of 2024. The Omgevingsdienst Noord Holland Noord supervises and enforces nature protection for TSIJ. This authority is responsible for issuing permits and exemptions for activities that may adversely affect nature, as well as conducting inspections to ensure the effectiveness of protective measures.

TSN is committed to complying with these regulations and has developed an ecology procedures for addressing biodiversity during any new project. These prescribe the steps to be undertaken at the start of and during the execution of projects; and outlines how the results of ecological studies and measures should be processed.

Before starting any activity, TSN assesses whether nature (flora and fauna) may be affected. A permit is required for impacts identified, and mitigating measures must be implemented. As part of the permit process, TSIJ submits a nature study and activity plan to the Omgevingsdienst Noord Holland Noord, outlining potential impacts and proposed mitigation measures for flora and fauna activity. Additionally, under the Green Steel Plan, TSN has designated a specific area to offset impacts on protected species, in cooperation with the competent authority.

Biodiversity in our upstream value chain

We include a biodiversity conservation clause in TSN’s Responsible Supply Chain Policy and engage with suppliers to understand their initiatives for managing biodiversity-related risks. TSN has also developed a supplier questionnaire that asks about the nature, likelihood and severity of biodiversity risks and whether suppliers have an ISO 14001 certificate; if not, they are encouraged to get one.

This questionnaire forms part of our biodiversity risk assessment process, which is designed to help us proactively manage biodiversity-related risks. The risk assessment is structured according to the LEAP framework (Locate, Evaluate, Assess, Prepare) and guided by insights from the World Wide Fund for Nature (WWF) Biodiversity Risk Filter tool. The results offer an initial view of possible biodiversity risks in TSN's supply chain and highlight areas for focus. We are therefore working to increase our understanding of how biodiversity risks might impact our business resilience and strategy. In order to effectively manage physical and reputational risks, TSN has begun collaborating with suppliers, local communities and non-governmental organisations (NGOs) to promote biodiversity conservation.

Looking ahead

In 2025–2026, we will further develop our newly implemented Biodiversity Management Plan for TSN sites, which is based on the approach taken by Tata Steel Limited.



Resource use and circular economy

Why this topic matters

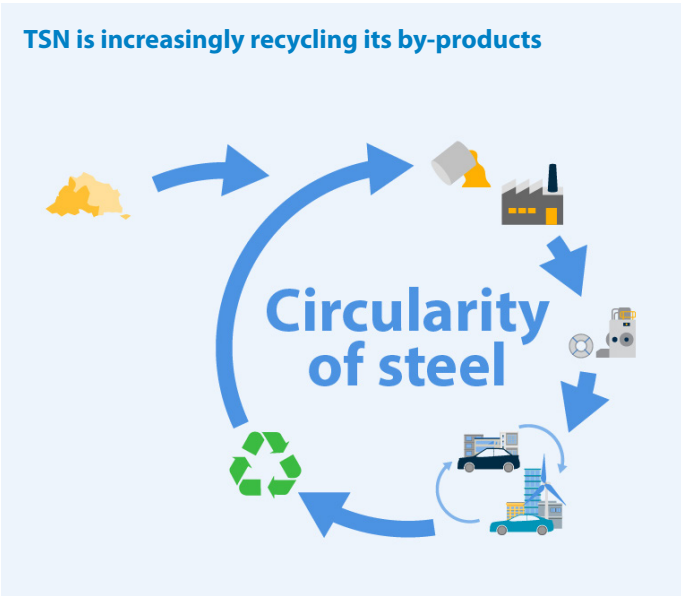
TSN’s operations are inherently resource intensive, relying on non-renewable material inputs such as iron ore and coal. This makes responsible sourcing and efficient use of resources a priority. The use of virgin materials not only contributes to environmental degradation through resource depletion and emissions in our upstream value chain, but also exposes TSN’s own operations to risks such as price volatility, supply chain disruptions and evolving regulatory requirements.

As materials move through steel production processes and into final products, TSN also generates by-products that are sold for use by external parties. While this supports circularity, the environmental impact of these materials depends significantly on how they are used. Improper application or insufficient oversight in downstream use can result in unintended environmental impacts. We are committed to using resources responsibly, including reusing or recycling the majority of substances released during production, as part of our aim to become a less resource-intensive and more circular steel company. This contributes to reducing TSN’s environmental impact and mitigating any supply chain risks, as outlined in the 'Risk management and compliance' section of our management review. Our process for identifying material topics is outlined in the chapter General disclosures. Through our DMA, we have identified resource inflows, resource outflows and waste as material sub-topics within the area of circular economy and resource use.

How we manage this topic

Approach

TSN aims to optimise the use of raw materials and energy efficiently. Many substances released during our steelmaking processes are reused in order to conserve virgin materials, reduce CO<sub>2</sub> emissions, prevent waste generation and provide economic benefits. Our strategy for achieving greater circularity includes: improving circularity in steel production by reducing reliance on virgin materials, sourcing materials sustainably, recycling materials such as scrap and developing products to maximise the lifespan and productivity of steel items. This is driven by TSN’s Responsible Supply Chain Policy. We implement effective waste management practices by reusing or recycling residual materials internally, using them externally as by-products and aiming to reduce waste sent to landfills and incineration.



Circular steel

Scope

This includes resource inflows that are relevant to upstream sourcing and TSN's own operations; resource outflows related to TSN's own operations and downstream use; and waste that is generated and managed across our entire value chain.

Actions

TSN's Green Steel Plan is our key action to improve steel circularity. Under this plan, we will transition to steel production using sustainable energy sources and increase the use of scrap steel to improve circularity and reduce the consumption of primary resources.

Sustainable sourcing of virgin materials

Producing high-quality steel requires a diverse inflow of resources, including non-renewable raw materials like iron ore, coal, alloys and flux materials such as lime. During the reporting year, for the production of 6.75 million tonnes of liquid steel, TSIJ used around 15.7 million tonnes of raw materials. We are taking steps to mitigate the impacts and risks associated with material inflows by enhancing process efficiency and sourcing raw materials responsibly and sustainably.

To support this, TSN collaborates with its parent company to develop clear key performance indicators (KPIs), enhancing transparency and ensuring we work towards precise targets. Suppliers must disclose the percentage of sustainably sourced materials and provide details of their ISO 9001, 14001, 45001 and 50001 certifications, which are seen as a measure for effective environmental management and energy efficiency), through an annual ESG questionnaire. In 2024–2025,

effective monitoring of suppliers’ certifications and environmental management systems contributed to our BES 6001 accreditation rising from 'Good' to 'Very good'.

For 15 materials and semi-finished products with an elevated risk profile (see chapter Responsible value chain), we maintain a live inventory of the locations of mines and smelters/processors. TSN also requires suppliers to adhere to our Responsible Procurement Policy; the percentage of our tier 1 suppliers who adhere to this policy is shown in the map below.

Reuse and recycling of materials

During the reporting year, TSIJ recycled or reused around 1,350 kilotonnes of residual material internally, including 450 kilotonnes of scrap. Scrap originates from our own production processes and is typically regarded as a yield loss when generated early in the production cycle. In line with the principles of the waste hierarchy, TSN aims to prevent yield loss in the first place, but strives to recycle the highest percentage possible when it does occur.

In addition, we purchased 865 kilotonnes of scrap from third-party entities within the metal processing, demolition and waste processing sectors. This scrap was used as secondary raw material in the steel production process. This contributes to the reduction of CO<sub>2</sub> emissions during our production process, as the scrap merely requires melting down, which makes it an energy-efficient alternative to primary steelmaking. Every tonne of scrap reprocessed into steel results in 1.6 tonnes of CO<sub>2</sub> savings compared to steelmaking from primary raw materials via the blast furnace route.

TSN's Green Steel Plan also includes installations designed to increase the use of scrap materials. TSN will have the capability to include at least 30% recycled content in steel production with the transition to EAF steelmaking. In the meantime, we will continue to investigate how to increase current scrap input levels (20%) with our existing installation.

To enable the above-mentioned increases, we have implemented logistics and process optimisation measures to address bottlenecks and logistical challenges; for instance, we are improving harbour capacity at TSIJ so we can receive a higher proportion of scrap via water.

Internal reuse of residual materials

The use of residual materials reduces TSN's dependence on virgin materials, conserves natural resources and decreases CO<sub>2</sub> emissions. Reverts contain useful elements (such as Fe, C, CaO, MgO and Al<sub>2</sub>O<sub>3</sub>), and if they are in an oxidic form they are recycled through the sinter plant. In addition, the processing of materials by Harsco – TSIJ’s on-site waste processor – results in metal products that are mainly recycled through the steel plant as scrap replacement.

Durable and circular steel

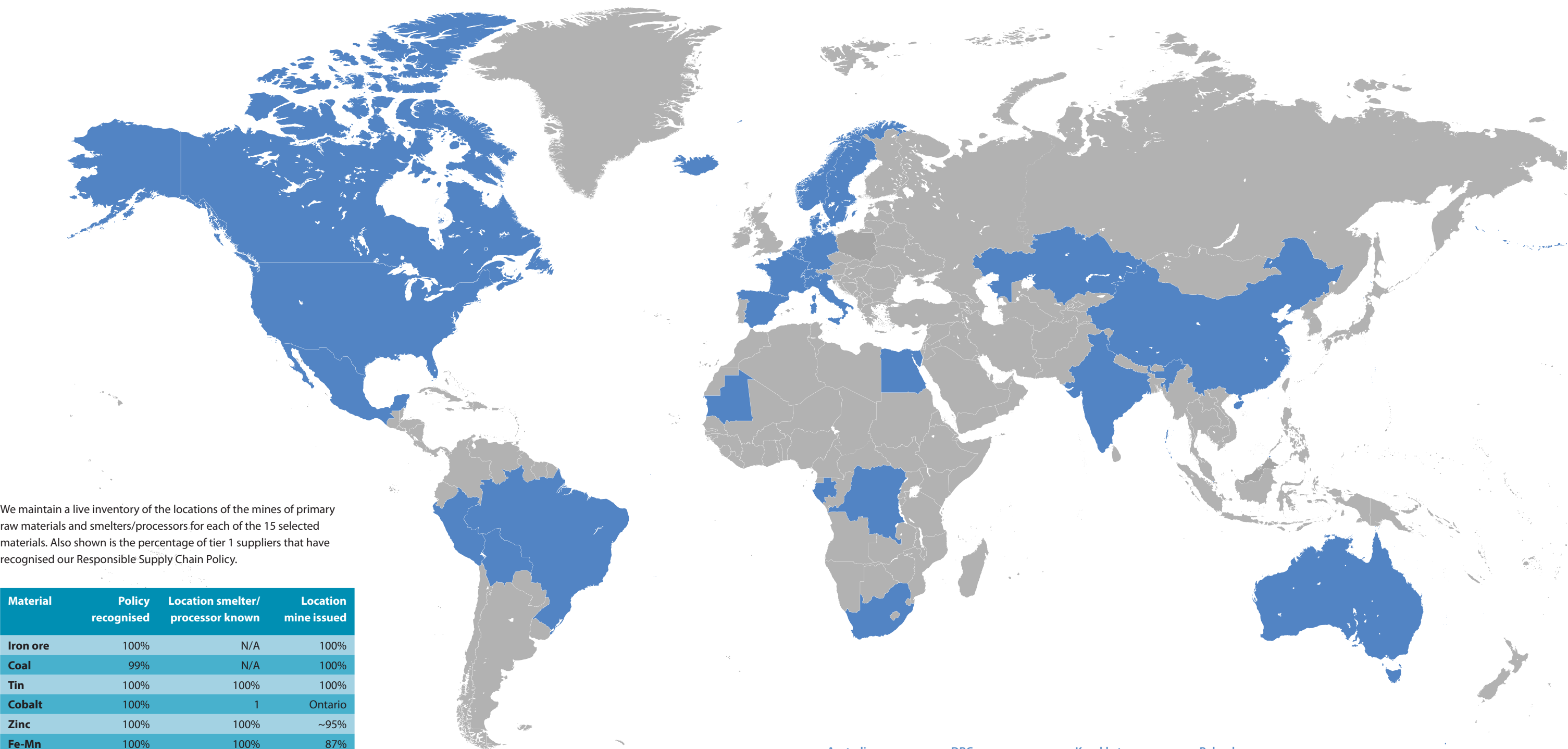
Steel is crucial to modern society due to its strength, versatility and recyclability. It is also fundamental to advancements in key areas of the climate transition, including electric vehicles, solar energy, wind power and energy-efficient buildings.

TSN's steel products contribute to enhancing sustainability in our customers’ applications. We are committed to producing high-quality, durable products with extended lifetimes that can be efficiently recycled or reused.

TSN develops innovative steel solutions – both products and services – through its own research and development (R&D) and strategic partnerships. By continuously enhancing our capabilities, we aim to provide value-added, high-quality steel that contributes to more efficient and sustainable products throughout their life cycle. Examples of our key initiatives in this regard include:

- Innovation in our product portfolio: In 2024–2025, we launched CP800 Hyperflange®, a superior chassis product that provides a lightweight solution for automotive applications, making cars more fuel efficient.
- Supporting customers’ emission reductions: Our R&D helped a major manufacturer to prove the feasibility of a steel e-bike frame that would cut its CO<sub>2</sub> footprint by 75% versus aluminium. Following this successful exploratory phase, we will investigate rapid prototyping techniques to create the steel frame using stamping methods common in the automotive sector; we already carry out similar projects with automotive manufacturers to make cars stronger and lighter.
- Increasing scrap content: We are working with our customers to ensure a smooth transition to our new steel products with increased scrap content. Sample coils made to replicate those with increased recycled content have passed formability trials run by European car and metal packaging manufacturers. Such test runs mean that our customers can confidently make the transition to more circular steel as soon as it becomes available in our portfolio, thereby speeding up the sustainability transition throughout the value chain.
- Post-consumer recycling: We have started using more post-consumer food tins and steel beverage cans in our steel production. This is part of a large-scale recycling initiative with the goal of using 120 million kg of these inputs by 2026.

Origin of 15 selected materials  
(mines and processors of raw materials)



We maintain a live inventory of the locations of the mines of primary raw materials and smelters/processors for each of the 15 selected materials. Also shown is the percentage of tier 1 suppliers that have recognised our Responsible Supply Chain Policy.

Material	Policy recognised	Location smelter/processor known	Location mine issued
Iron ore	100%	N/A	100%
Coal	99%	N/A	100%
Tin	100%	100%	100%
Cobalt	100%	1	Ontario
Zinc	100%	100%	~95%
Fe-Mn	100%	100%	87%
Fe-Cr	100%	100%	81%
Fe-Nb	100%	100%	100%
Fe-V	100%	100%	100%
Fe-Si	100%	100%	100%
EMM	100%	100%	71%
Cr (aq)	100%	100%	100%
Bentonite	100%	100%	100%
Magnesium	1.00	0.80	50%
Scrap	>95%	100%	N/A

- Australia

Belgium

Bolivia

Brazil

Canada

China

Denmark
- DRC

France

Gabon

Germany

Iceland

India

Italy
- Kazakhstan

Luxembourg

Mauritania

Mexico

Netherlands

Norway

Peru
- Poland

Singapore

South Africa

Spain

Sweden

Switzerland

USA



Targets and performance

TSN aims to increase recycled content to 30% by 2030 as part of our transition to low-CO<sub>2</sub> steelmaking. In 2024–2025, the average recycled content of steel made via the existing process route was 20% (2019 baseline: 17%).

Resource use for steel production – TSIJ

unaudited/no assurance

Resource use for steel production	FY2024/25	FY2023/24	%FY(2024/25) / FY(2023/24)
Total weight of raw materials used during the reporting period (million tonnes) <sup>1</sup>	15.73	11.95	+31.6%
Weight in absolute value of virgin raw materials used to manufacture our products (million tonnes) <sup>2</sup>	13.48	10.26	+31.3
Weight in absolute value of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture our products and services (million tonnes) <sup>3</sup>	2.25	1.69	+33%
Weight in percentage of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture our products and services	14	14	-

1. Includes key raw materials used in steel production at TSIJ: iron ore, coal, coke, limestone, internal and external scrap, burnt lime, crude dolomite, burnt dolomite and other recycled materials.  
2. Includes virgin raw materials sourced for steel production: iron ore, coal, coke, limestone, burnt lime, crude dolomite and burnt dolomite.  
3. Secondary raw materials refers to internally and externally sourced scrap and use of other recycled materials used at TSIJ.

Looking ahead

We are continuing to explore ways to further increase the use of recycled content within the constraints of our existing steelmaking facilities.

Waste management

Scope

This sub-topic covers waste management at TSN sites.

Actions

TSN's production processes generate various by-products, some of which are then referred to as co-products, reverts or waste. This depends on whether they are intentionally or unintentionally made and what their final destination is: those that are reused internally are known as reverts, while co-products (intentional) and by-products (unintentional) are sold externally and waste is handled by waste management companies by means of recycling, incineration or landfilling. At TSIJ, around 99% of by-products are reused or recycled internally or externally.

External reuse of residual materials

Steel production is, by nature, a refining process, and each refinement step generates a by-product or co-product. By building some further processing steps into our production route, we make products such as ammonium sulphate, benzene, tar, sulphuric acid and granulated blast furnace slag (GBFS), ready to be used as prime input materials for other industries. GBFS, for example, is used as a raw material in the cement industry and contributes directly to the industry's CO<sub>2</sub> reduction efforts.

During the refinement step from liquid iron to liquid steel, the co-product known as steelmaking slag is produced. The composition of this slag is not compatible with the same applications as GBFS, and so different applications are found. TSN's current processing method generates a stone-like steelmaking slag that is certified as a secondary building material, replacing virgin materials such as sand and gravel in civil engineering applications such as road building.

In the Netherlands, increasing attention is being paid to the improper use of steelmaking slag in construction projects - see Main developments (page 22) and Risk management and compliance (page 29). TSN supports stricter laws and regulations on the use of steel slag and is proactively engaging in discussions on the topic with the value chain. Ultimately, the appropriate use of alternatives to sand, stone and gravel in the construction industry – like steel slag – will help to support the transition to a circular economy.

The transition to lower-CO<sub>2</sub> steelmaking means production routes will change drastically, eventually eliminating some by-products and co-products, while introducing some new ones. TSN aims to continue its approach of finding the best possible application for these materials, working together with research institutes, customers and partners to ensure that current challenges related to steelmaking slag are met with long-term solutions, such as sustainable construction materials or building products.

Reducing waste to landfill and incineration

TSN is working on solutions to reduce the amount of non-reusable waste sent to landfill sites. Use of landfill is restricted to only the very small percentage of material where contaminants are concentrated to such a degree that the material is no longer suitable for further processing. Currently, only 1% of TSIJ's total by-products are sent to landfill and incineration. TSN is exploring new methods to divert waste away from landfill to more useful applications. For more details, see the table below.

Performance

A substantial part of the total waste generated (82%) is diverted from disposal by waste processing companies that enable reuse or recycling. The remainder (18%) is directed to disposal, which means incineration or landfill.

Waste management – TSIJ

unaudited/no assurance

Waste (reported by calendar year)	CY2024			CY2023		
	Total waste directed to disposal	Total waste diverted from disposal	Total waste generated	Total waste directed to disposal	Total waste diverted from disposal	Total waste generated
Hazadous waste (thousand tonnes)	27	26	53	32	28	60
Non-hazardous waste (thousand tonnes)	11	141	152	11	164	176
Total	38	167	205	43	192	236

# Definitions of resource use and circular economy KPIs

KPI	Definition
Resource inflow	
Total weight of raw materials used during the reporting period	This is the total weight in million tonnes of primary raw materials used in steel production at TSIJ. This includes iron ore, coal, coke, limestone, internal and external scrap, burnt lime, crude dolomite, burnt dolomite and other recycled materials.
Weight in absolute value of virgin raw materials used to manufacture our products	The weight of virgin raw materials in million tonnes sourced for steel production include: iron ore, coal, coke, limestone, burnt lime, crude dolomite and burnt dolomite.
Weight in absolute value of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture our products and services	This refers to the weight of internally and externally sourced scrap and the use of other recycled materials in million tonnes used in the steel production process at the IJmuiden site.
Weight in percentage of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture our products and services	Represents the percentage of the weight of secondary materials relative to the total weight of raw materials used in the reporting year.
Waste	
Total waste directed to disposal	Waste directed to disposal is all waste that goes to landfill or incineration (without energy recovery) reported in tonnes.
Total waste diverted from disposal	Waste diverted from disposal is all waste that is recycled; or incinerated (with energy recovery) reported in tonnes.
Total waste generated	Represents the total amount of hazardous and non-hazardous waste generated (in tonnes) by TSN, including waste that is either directed to disposal or diverted from disposal.
Hazardous waste	Waste that displays one or more of the hazardous properties listed in Annex III of Directive 2008/98/EC of the European Parliament and of the Council on waste.



# SOCIAL



## Own workforce

### Why this topic matters

The challenging demand conditions in Europe – driven by geopolitical developments, trade and supply chain disruptions and escalating energy costs – have affected our operating costs and financial performance over the past years. To be able to invest in new ways of steel production, now and in the future, Tata Steel Nederland (TSN) needs to remain competitive and profitable. Consequently, we are undergoing a major organisational change, the largest in the past 30 years.

To regain competitiveness and work towards our green future, we need a leaner organisational structure. TSN is therefore taking measures to realise this, including a restructuring affecting all layers of our organisation in IJmuiden. Any redundancies are not taken lightly, and TSN is working closely with the works councils and unions to establish a social safety net for affected employees.

TSN's transformation programme ties together existing and new cost-saving measures, different ways of working and a stronger focus on accountability. Our organisational change involves various workstreams in which employees from different disciplines and departments will work together on projects to make TSN more agile, decisive and flexible, while also reducing our fixed costs. In this way, we are building a futureproof and profitable steel company for the future, supported by a more centralised workforce.

Furthermore, building on the crucial role that employees play in driving TSN's future success, our human resources (HR) efforts are also directed towards mitigating the impact of staff shortages in critical fields like engineering and information technology (IT). Staff shortages have intensified in recent years, due to the labour market becoming increasingly tight in the Netherlands and other European countries.

Material matters related to our own workforce are grouped under three sub-topics: health and safety; working conditions; and equal treatment and opportunities for all.

## How we manage this topic

### Approach

TSN has policies in place covering health and safety, human rights and diversity and inclusion.

While the majority of TSN's workforce consists of its own employees, its commitment to employee vitality and well-being is also applicable to non-employees.

## Employees

**People on our payroll,  
including permanent  
and temporary workers**

## Non-employees

**Self-employed  
contractors and  
agency workers**

### Health & Safety Policy

The industrial conditions at our steel plant in IJmuiden and our Tata Steel Downstream Europe (TSDE) sites constantly place pressure on the health and safety of our employees and contractors as well as on-site third-party workers. Safety is therefore our top priority throughout TSN, with our Health & Safety Policy outlining TSN's guiding principles for the safety and health of everyone involved in or affected by the company's operations.



*TSN Code of Conduct*  
TSN is committed to respecting the human rights of its workforce, as outlined in TSN’s Code of Conduct. We liaise with our workforce on human rights matters through works councils and local surveys and provide channels for raising concerns, including those related to human rights. TSN ensures that any complaints are investigated and that follow-up actions are taken where necessary to provide remedies for human rights impacts.

*Diversity & Inclusion Policy*  
TSN is committed to ensuring diversity in our workforce and an inclusive work environment with equal opportunities. Our Diversity & Inclusion Policy sets out TSN’s commitment to inclusion and addresses diversity; gender equality and equal pay; and violence and harassment at Tata Steel IJmuiden (TSIJ).

- The objectives of the Diversity & Inclusion Policy are:
- To foster a more inclusive work climate.
  - To increase ethnic and cultural diversity across all jobs.
  - To increase the number of women in vocational technical jobs at secondary vocational education (MBO) level.
  - To increase the number of women in decision-making jobs.

*Process for engaging with own workforce*  
We believe proper employee participation is important and are convinced that this is in the interest of both the employees and the company.

At TSIJ, works councils (six in total) play a role in consultations involving their own specific work units. Within TSDE, the interests of employees are represented by separate works councils. In all cases, there is consultation between the Managing Director and the employee representatives. The works councils appoint members to the IJmuiden Group Works Council and Central Works Council. Consultations with the trade unions on employment terms are held regularly. Central consultations are held at TSN level.

Alongside indirect engagement with employees via the works councils, we engage directly with employees via local surveys on social safety. This gives us insight into the perspectives of our full, diverse group of employees.

- Process to remediate negative impacts*  
TSN has processes in place to remediate negative impacts on the workforce. The channels available for reporting complaints are outlined in TSN’s Confidential Reporting Policy. Employees may report matters, without fear of retaliation, via the following reporting channels:
- Integrity Line
  - Director Integrity & Asset Protection

All reports are handled fairly, protecting the rights and confidentiality of everyone involved. Further details on these reporting channels are available in chapter Governance.

**Health and safety**

**Scope**  
This sub-topic covers TSN’s workforce worldwide, which includes employees and non-employees. Also in scope are the on-site third-party workers at TSIJ and TSDE.

**Actions**  
Our health and safety management system is continuously evolving to prevent personal injuries and accidents, unsafe situations in business operations, major process safety incidents, exposure to hazardous substances and other work-related risks.

To maintain safe operations and to comply with health and safety regulations, TSN ensures that everybody working on site is well informed, trained and aware of their task-related risks and of actions to minimise them. New joiners are obliged to pass a safety test, and employees must repeat the test every two years to ensure their knowledge and awareness remain up to date. We provide comprehensive training through e-learning and practical instruction, covering topics such as process safety, fire awareness and hot work. We also have numerous safe working procedures in place that inform employees about risks and mitigations relating to particular tasks. Employees must undergo training on these procedures before being authorised to perform these tasks. For infrequent tasks, risk assessments must be carried out before work is authorised.

*Health and safety management system*  
TSN has implemented a robust health and safety management framework. Based on 15 principles, it is designed to prevent personal injury, unsafe situations and exposure to hazardous substances. We are currently transitioning towards a certified health and safety management system according to ISO 45001. To date, 18 sites (out of 22) have achieved certification, and we aim to increase this to all sites. The system follows the Plan, Do, Check, Act management model for continuous improvement.

*TrueSafe initiative*  
To further improve safety at TSN sites, and in particular to counter a rise in recordable injuries and lost-time incidents (LTIs) among our own employees, we have developed the TrueSafe programme. This initiative aims to strengthen our proactive safety management culture and thereby to prevent unsafe behaviour and working conditions. TrueSafe emphasises organisational aspects of safety and the competence and alignment of people delivering safety performance on the shop floor. The goal is to mitigate risks in a more effective way and thus contribute to reducing incidents and injuries.

*Occupational safety*  
We use central Hazard Identification and Risk Assessments (HIRAs) to create an overview of possible safety risks and associated measures. This overview is shared with our different operating units. To improve safe working conditions for third parties, we have further rolled out our Workpermit Registration App (WRapp 2.0).

Another initiative to enhance the safety of our contractors and own employees is the use of special trainings for supervisors of contractor work. This is done in cooperation with the contractors.

*Process safety*  
Process safety management is one of the main pillars of our work to prevent major process safety incidents. In the year under review, we made further efforts to guarantee the integrity of our installations, by tailoring maintenance regimes more specifically to the type of installation. The procedure for securing process installations during stoppages and shutdowns has been adapted and rolled out to the various units. Barrier management is another important element of process safety; in the financial year 2024–2025, we took important steps towards completing process hazard analyses of our existing high-hazard facilities, which will enable us to improve our barrier management.

*Health roadmap*  
We have a health roadmap in place that guides us towards our goal: ‘We work in optimal conditions to be able to live and work in a fit and healthy way’. This shared vision emphasises the importance of sustainable employability and preventive sickness absence. Preventing exposure to hazardous substances and conditions is one of the top priorities for the avoidance of occupational diseases. The chance that employees may experience extreme temperatures (heat stress) is inherent in our processes. To remove (and to list and catalogue) these risks, we are developing an app that employees can use to manage their heat stress.

We are regularly updating our standard operating procedures related to quality, health, safety and environment (QHSE). In this way, we implement the applicable national and international laws and regulations in a timely and correct manner.

We initiate improvement measures and other projects based on learnings from incidents and analysis of reported information, with progress monitored through monthly steering committees at business unit level and Board of Management (BoM) level. In addition, we conduct quarterly deep dives and trend analyses, focusing for example on incident types, the increase of LTI numbers among own employees or the decline in LTI numbers for contractors.





Performance

Health and safety metrics

unaudited/no assurance

Health and safety metrics	FY2024/25	FY2023/24	Target 2025/2026
Coverage of health and safety management system:			
Own workforce covered by health and safety management system (%)	100%	100%	
Number of fatalities:			
In own workforce as a result of work-related injuries	0	0	0
As a result of work-related injuries of other workers (value chain workers working on site)	0	0	0
LTIs:			
Own workforce	25	15	
Value chain workers on site (incl. contractors)	10	12	
Total	35	27	
Lost days due to LITs – own workforce	1,278	1,425	
LTI frequency (LTIF) rate <sup>2</sup> :			
Own workforce	1.33	0.81	
Value chain workers on site (incl. contractors)	1.79	1.97	
Total <sup>3</sup>	1.43	1.10	1
Number of recordable work-related incidents:			
Own workforce	127	94	
Value chain workers on site (incl. contractors)	58	128	
Total	185	222	
Recordable injury frequency rate <sup>4</sup> :			
Own workforce	6.73	5.10	
Value chain workers on site (incl. contractors)	10.23	21.00	
Total <sup>5</sup>	7.57	9.05	5
ISO 45001 certification:			
Number of sites with ISO 45001 certification	18	14	
Sites with ISO 45001 certification as a percentage of all TSN sites	94%	74%	

1 An LTI is a workplace incident that results in an employee missing at least one full workday due to an injury.  
2 LTIF rate refers to the number of LTI incidents per 1 million work hours.  
3 Calculated based on total incidents and total working hours of own workers and value chain workers.  
4 Recordable injury frequency rate refers to the number of incidents per 1 million work hours.  
5 Calculated based on total incidents and total working hours of own workers and value chain workers.

Looking ahead

We will continue our dedication to maintaining a strong safety culture. Progress on various projects and programmes is ongoing, including:

- Empowering safety communication, using the TrueSafe programme to encourage bottom-up reporting of safety issues from the shop floor.
- Enhancing health and safety metrics by defining leading indicators, streamlining data collection and developing a dashboard to support shop floor insights and safety initiatives.
- Strengthening operational safety with secure load procedures for internal road transport and comprehensive process safety assessments.

Working conditions

Scope

This sub-topic covers TSN's workforce at our sites, including employees and non-employees.

Actions

At TSN, we need to change the way we work to drastically improve our financial performance. These are not only prerequisites for being competitive, but also hard conditions for support from both the government and our parent company as we transition to our green future. We will therefore adopt a leaner approach across the company, creating a smaller and more centrally organised TSN. This will result in a significant reduction in jobs.

We do not take these redundancies lightly. We will negotiate a so-called Social Plan with the trade unions to deal with the personnel consequences of the reorganisation. This Social Plan will include arrangements to guide affected employees ‘from job to job’ and financial instruments such as compensation for dismissal.

As part of the transition to low-CO<sub>2</sub> steel, TSN has reached an agreement with the trade unions: the Green Steel Social Contract. This agreement stipulates that TSN is committed to internally redeploying employees whose jobs will be lost due to the closure of Coke and Gas Plant 2 (CGP2) and Blast Furnace 7 before 2030.

From 2026 onwards, TSN will assist these employees in finding new positions. This will involve close cooperation with the operational departments and the Tata Steel Academy, which will develop the necessary training programmes. This redeployment process is not only essential for securing employment, but also for retaining knowledge and experience within our organisation. The collaboration with the Tata Steel Academy will ensure that employees have the right skills during this important transition period.

Recognising the significant positive impact of the trade unions and works councils, TSN understands that collective bargaining power not only strengthens its employees’ voices but also enhances operational

effectiveness. By facilitating open dialogue and cooperation between management and staff, TSN aims to support a good working climate and foster a diverse and inclusive work environment.

At TSIJ, 96.2% of employees are covered by a collective labour agreement (CLA). Sector CLAs apply to TSDE sites in the Netherlands. Benchmarks show that salaries in the CLA are above market and fall within the upper quartile. In addition, 45.9% of the employees at our IJmuiden site are members of a union.

Effective collective bargaining can lead to fair wages, improved working conditions and better employee benefits, fostering a positive and collaborative relationship between the company and its workforce. TSN and the trade unions have agreed a new CLA for TSIJ for a period of 12 months (1 April 2025 until 31 March 2026). Because of the current economic challenges within the company, the CLA includes no structural increase in wages but does include three one-off payments, the last of which will only be paid if the EBITDA target in the annual plan is met. With this agreement, the trade unions and employees support the company during the current challenging economic situation.

Performance

Collective bargaining coverage

unaudited/no assurance

Coverage rate	Employees (EEA) <sup>1</sup>	Employees (non-EEA)
0–59%	-	-
60–79%	Germany	United States of America (USA)
80–100%	Netherlands France Belgium Spain Switzerland Sweden	

<sup>1</sup> European Economic Area. Includes countries with more than 50 employees.

Employee turnover

unaudited/no assurance

Leavers and employee turnover	FY2024/25	FY2023/24
Total leavers (headcount)	1,056	962
Rate of employee turnover	8.4%	7.6%

The increase in employee turnover in 2024–2025 compared to the previous year can mainly be attributed to an increase in the number of employees retiring.

Equal treatment and opportunities for all

Scope

This sub-topic covers TSN's workforce worldwide, including employees and non-employees.

Actions

Through a lens of dedication to equality and empowerment, TSN places a strong focus on key themes such as diversity, gender equality, violence prevention and employee skills development.

Fostering a more inclusive work environment

We recognise the importance of promoting diversity and inclusion in our workforce to ensure social safety and boost innovation and productivity. TSIJ runs a programme of activities to encourage and promote diversity and inclusion, including communication campaigns, inspiration sessions and a Diversity Day. The aim is to remove unconscious bias and create a socially safe workspace for all employees, regardless of their cultural background, age, religion, gender (identity), disability, sexual orientation or any other characteristic.

We conducted our annual ‘Being Yourself Works’ survey in February 2025 to assess perceptions of inclusion and cultural diversity in the workplace over the financial year 2024–2025. The survey focuses on diversity and inclusion, particularly in relation to women and non-Dutch employees. More than 2,300 employees participated in the survey, with the results revealing that 97.4% of employees feel they can be themselves at work.

Gender equality

TSN has a number of programmes and initiatives that focus on increasing the number of women in (i) vocational technical jobs at MBO level and (ii) decision-making jobs.

To increase the number of women in leadership positions, we have created the Future Female Leadership programme for women with the ambition and potential for a leadership position at TSN. By helping women to develop their individual strengths and talents, this programme is one way in which we aim to ensure a more equal distribution of men and women in decision-making positions.

The [Fe]Male Network, meanwhile, aims to promote equality and inclusion for all by increasing the visibility and involvement of women in our organisation, while also providing a platform for networking and exchanging experiences.

Socially safe working environment

TSN strives to promote a socially safe working environment where everyone is treated ethically and with respect. In IJmuiden, our Social Safety Manual outlines the channels through which employees can raise concerns related to inappropriate behaviour. Extensively trained confidential advisers handle reports and organise team sessions to raise awareness about social safety, prevention of inappropriate behaviour and response strategies. A Social Safety Taskforce, comprising members from various parts of the company, is active in raising awareness about appropriate behaviour and lowering the barriers for raising complaints.

Training and skills development

To support the transition to low-CO<sub>2</sub> steel production, we are increasingly focusing on training employees in the field of sustainability and preparing Tata Steel Academy students for the new production installations that will be introduced as part of our Green Steel Plan. Our vocational training courses in electrical, mechanical and process engineering all include a hydrogen learning module.

The Tata Steel Academy also offers training opportunities for existing employees from a non-technical background to take on new positions in our production units. Existing employees can also participate in technical vocational level and bachelor level studies via the Tata Steel Academy.

Due to financial constraints, TSN has paused all ‘soft skills’ training courses, such as leadership training. Formal training is essential ‘hard skills’ and compliance issues, including health and safety, continues.

Targets and performance

TSIJ aims to have 5% women in technical roles at the MBO level by financial year 2026–2027. In 2024–2025, this was at 2.8%, showing there is still work to be done to become a more attractive employer for this target group. Encouragingly, around 9.8% of students at the Tata Steel Academy during the year were women. We are also committed to improving the gender balance in leadership positions. At TSN, women held 29% of top management roles in 2024–2025, and our target is to increase this to at least 30% by 2026–2027.

We also strive to ensure more cultural diversity in all job categories. TSN applies the definition of Statistics Netherlands (Centraal Bureau voor de Statistiek): the percentage of people not born in the Netherlands and/ or with one or both parents not born in the Netherlands. According to Statistics Netherlands, more than 25% of the Dutch population falls under this definition, while at TSIJ the figure is 16%. Since we want our workforce to be a reflection of our society, we therefore apply the annual Statistics Netherlands figure as a target, in this case 25%.

Employee characteristics: By gender

Gender	Number of employees (headcount)
Male	10,972
Female	1,381
Total employees	12,353

Total number of non-employees:

	FY2024/25	FY2023/24
Total number of non-employees (headcount)	576	708

Employee characteristics: By country and gender

Country	Number of employees – male (headcount)	Number of employees – female (headcount)	Total number of employees (headcount)
Netherlands	9,237	1,111	10,348
Germany	535	96	631
France	466	58	524
USA	225	29	254
Belgium	173	12	185
Spain	125	23	148
Switzerland	98	26	124
Sweden	56	10	66
Turkey	3	0	3
Finland	40	6	46
Poland	4	4	8
Italy	4	3	7
Czech Republic	3	2	5
Norway	2	1	3
China	1	0	1
Total	10,972	1,381	12,353

Employee characteristics: By contract type and gender

Employees by contract type (headcount)	Male	Female	Total
Number of employees	10,972	1,381	12,353
Number of permanent employees	10,497	1,336	11,833
Number of temporary employees	475	45	520
Number of non-guaranteed hours employees	0	0	0
Number of full-time employees	9,586	768	10,354
Number of part-time employees	1,386	613	1,999

Diversity and inclusion at top management level

	FY2024/25		FY2023/24	
Gender	Headcount	%	Headcount	%
Male	22	71%	24	77%
Female	9	29%	7	23%

Distribution of employees by age group

Age group	FY2024/25	FY2023/24
<30	1,664	1,814
30–49	5,429	5,536
50+	5,010	5,293
Undisclosed	558	290



# Definitions of own workforce KPIs

KPI	Definition
Number of employees	This is the total number of individuals (headcount) who have an employment relationship with TSN, in accordance with national legislation. The data is presented by gender and broken down by country.
Number of non-employees	<p>Represents the total number of non-employees (headcount) engaged in TSN’s own workforce. This includes individuals who:</p> <ul style="list-style-type: none"><li>• Have contracts with TSN to supply labour (i.e., self-employed individuals), or</li><li>• Are provided by third-party companies primarily engaged in employment activities (classified under NACE Code N78).</li></ul> <p>For TSN reporting purposes, this category specifically includes individuals classified as ‘agency workers’.</p>
Permanent and temporary employees	<p>Total number of employees (headcount) categorised by contract type:</p> <ul style="list-style-type: none"><li>• Permanent employees: individuals with an unlimited (open-ended) contract.</li><li>• Temporary employees: individuals with a fixed-term contract that includes a defined end date.</li></ul>
Full-time and part-time employees	<p>Total number of employees (headcount) categorised by working hours:</p> <ul style="list-style-type: none"><li>• Full-time employees: those working more than 95% of standard full-time hours.</li><li>• Part-time employees: those working less than 95% of standard full-time hours.</li></ul>
Diversity and inclusion at top management level	Represents the number and percentage of male and female executives at the top management level of TSN. This includes members of the Board of Management (N) and the first management layer below the board (N-1), who are responsible for strategic decision-making and setting the direction of the organization.
Distribution of employees by age group	<p>Represents the distribution of employees across the following age groups:</p> <ul style="list-style-type: none"><li>• Under 30 years old.</li><li>• 30 to 50 years old.</li><li>• Over 50 years old.</li></ul>
Total leavers	<p>Represents the total number of individuals who, in accordance with national legislation, have an employment relationship with TSN and whose employment contract has been terminated, either:</p> <ul style="list-style-type: none"><li>• At the request of the employee, or</li><li>• Initiated by the company.</li></ul>
Rate of employee turnover	Percentage of employees who have left the organisation in the reporting period relative to the total number of employees.
Collective bargaining coverage	Percentage of TSN's own employees covered by collective bargaining agreements.
Number of fatalities	<p>The number of work-related accidents or work-related ill health resulting in a fatality during the reporting period, categorised as follows:</p> <ul style="list-style-type: none"><li>• Own workforce:<ul style="list-style-type: none"><li>- Employees</li><li>- Non-employees: self-employed contractors, agency workers or others working under TSN's control or direction.</li></ul></li><li>• Other workers, not part of TSN's own workforce (only when the incident occurred at TSN-controlled premises or work sites).</li></ul>

KPI	Definition
Lost-time injuries (LTIs)	Represents the total number of serious work-related injuries. This includes fatalities, permanent total disabilities and lost workday cases but excludes restricted work cases, medical treatment cases, reportable occupational illness and first aid cases.
LTI frequency (LTIF) rate	Represents the number of LTIs per one million working hours.
Number of recordable work-related incidents	The sum of injuries resulting in fatalities, permanent total disabilities, lost workday cases, reportable occupational illness cases, restricted work cases and medical treatment cases but excluding first aid cases.
Recordable injury frequency rate	The number of recordable work-related incidents per million working hours.

Responsible value chain

Why this topic matters

Producing high-quality steel requires a range of raw materials. Iron ore is an essential raw material for liquid iron production, while alloying elements like manganese and niobium help achieve specific steel properties. Coating elements such as tin, zinc and nickel meet diverse customer needs. Mining of these materials potentially causes negative impacts on value chain workers and affected communities due to poor working conditions and poor living conditions.

At TSN, we are committed to sourcing these materials responsibly, aiming to prevent and manage environmental and human rights impacts in our value chain, particularly around mining areas. A responsible value chain is transparent and respects human rights and the environment. We work to prevent and address negative impacts on workers and communities, partnering with those who share our commitment to international standards.

Our material sub-topics are health, safety and human rights impacts on value chain workers and affected communities, which are discussed further in the following sections.

How we manage this topic

Approach

The Tata Steel Group has established a Responsible Supply Chain Policy to articulate its commitment and to guide actions on responsible business in the supply chain. It is applicable to all supply chain partners and includes five principles concerning Fair Business Practices, Health & Safety, Human Rights, Environmental Protection and Local Community Development. As part of the Tata Steel Group, TSN has also adopted this policy.

Guidelines complement this policy and help supply chain partners in adopting the principles described in the policy. They articulate how we work with our supply chain partners and describe our expectations and minimum standards.

Health and safety for value chain workers and human rights for affected communities

Scope

We use due diligence activities to identify key risks related to working conditions and human rights risks in our upstream value chain. As a result, we have identified 15 raw materials and semi-finished products with elevated risk profiles. Our efforts focus on workers and affected communities involved in mining these elevated-risk materials.

Third-party due diligence

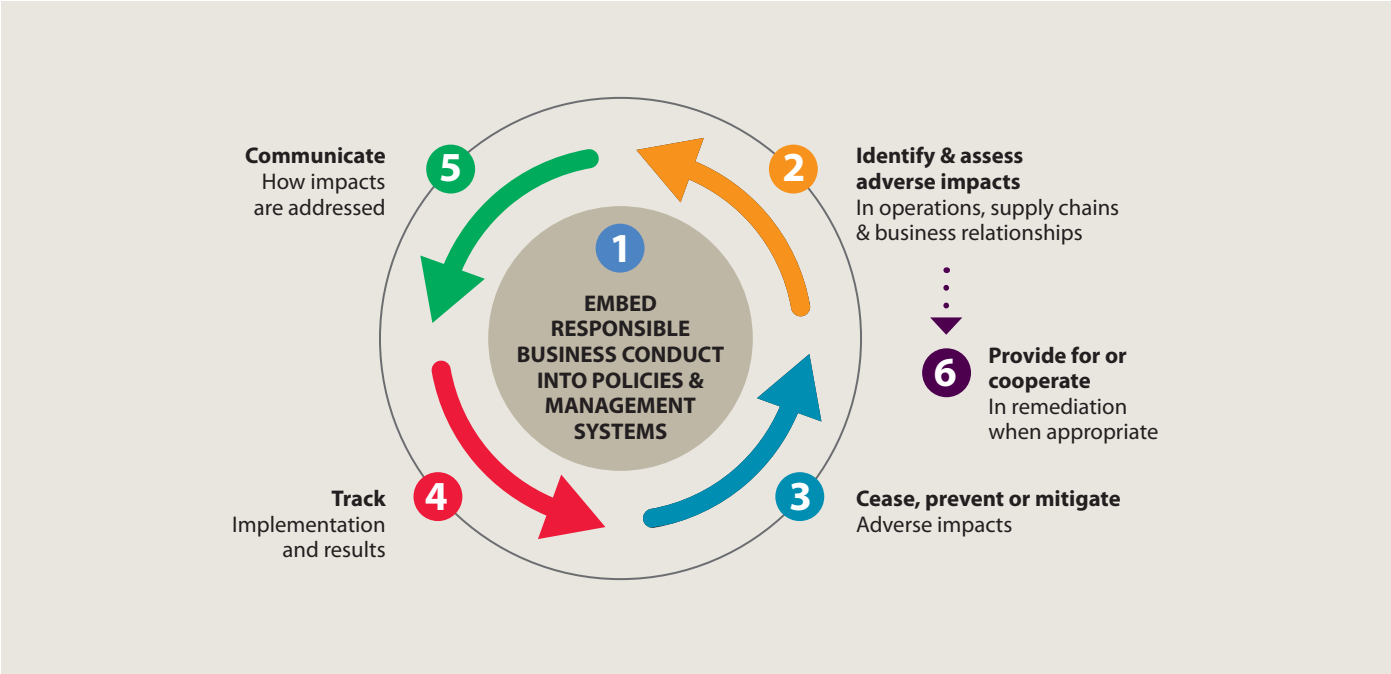
To ensure responsible and sustainable sourcing as outlined in our policy, we follow an approach derived from key international standards, including the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct and the United Nations (UN) Guiding Principles on Business and Human Rights. Rather than simply avoiding risks, we focus on effective risk mitigation.

Through our relationships with direct suppliers, we can identify, assess and manage impacts and risks. TSN strives to identify higher-risk sectors, geographies and value chains where impacts occur and seeks ways to contribute to addressing them appropriately.

In recent years, we have refined and strengthened our due diligence procedures, especially in structuring our supply chain analysis, identifying risks and prioritising themes. We have enriched our risk assessments by including data from both public and commercial data providers and have further systemised the prioritisation process by taking into account factors such as severity, likelihood and company engagement.

In our upstream value chain due diligence process, TSN has adopted the OECD's six-step framework, as illustrated here.

Upstream due diligence process



Process to remediate negative impacts

Tata Steel expects all upstream suppliers to have a clear process for identifying, addressing and remediating actual or potential environmental and social impacts. This includes regular monitoring, stakeholder engagement and accessible grievance mechanisms. When impacts are identified, suppliers must investigate, take corrective action – such as compensation, restoration or operational changes – and track effectiveness. Stakeholders should be kept informed throughout.

Suppliers should also use these cases to strengthen risk management and improve practices. Tata Steel values transparency and expects partners to uphold responsible and sustainable business conduct.

TSN's Confidential Reporting Policy applies to value chain workers as well as any other stakeholders, with the Integrity Line available for external stakeholders to raise complaints.

Value chain collaborations

We collaborate across the industry to implement shared standards for environmental and human rights due diligence. Since 2019, TSN has been a member of the International Responsible Business Conduct (IRBC) Agreement for the Metals Sector (Dutch Metal Covenant), a partnership involving 12 metal companies, non-governmental organisations (NGOs), the government, and major Dutch labour unions.

This initiative focuses on applying OECD Due Diligence Guidelines and exchanging expertise on supply chain transparency and mining-related community impacts. The IRBC agreement concluded in 2024, and TSN is currently involved in setting up a second agreement that will particularly focus on the theme of stakeholder engagement.

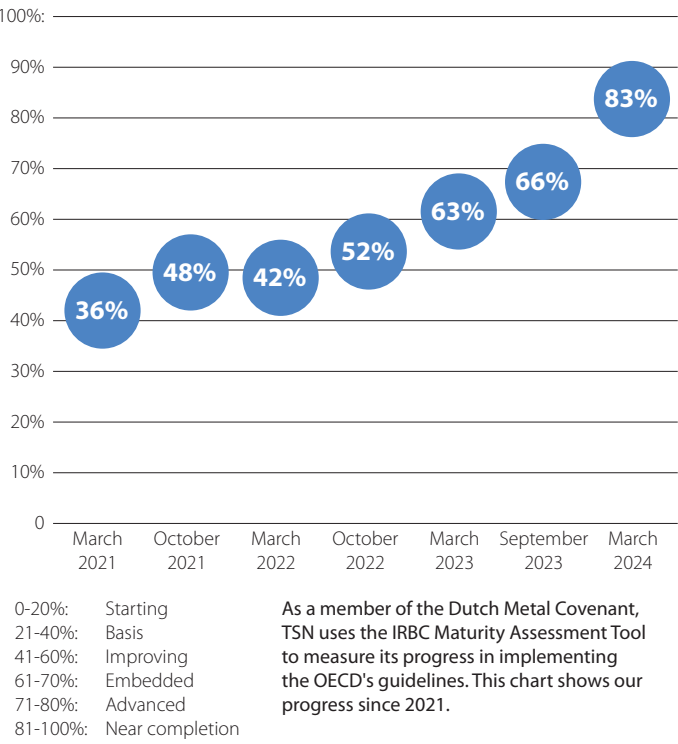


Targets and performance

Our aim is to further mature our responsible procurement processes, in particular increasing the transparency of our supply chains. We focus on 15 raw materials and semi-finished products with an elevated risk profile (see chapter Resource use and circular economy). Collaborating closely with our suppliers, we work to map these supply chains at least up to the relevant chokepoints, with a continued commitment to achieving full transparency down to the level of the mines.

We track progress using the IRBC Maturity Tool within the Metal Covenant. This tool, along with its associated self-assessment, provides a so-called MAT score that illustrates the level of TSN's due diligence process. This includes the development and integration of IRBC policies and management systems, as well as the measures taken to embed responsible business conduct into our overall policies and operations. The first IRBC concluded in 2024, whereby TSN reached a MAT score of 83% against a target of 80%.

Tata Steel Nederland MAT score



Every year, TSN undergoes BES 6001 certification for Responsible Sourcing. This standard demands transparency regarding the origin of raw materials (particularly iron ore, zinc, organic coatings and scrap), encourages sustainable sourcing and considers social impacts on local communities in the supply chain. In 2024–2025, our BES 6001 accreditation rating increased from ‘Good’ to ‘Very good’.

In collaboration with our parent company, Tata Steel Limited, we are developing additional key performance indicators (KPIs) for responsible sourcing, in order to enhance transparency and follow progress. As part of this initiative, we ask our suppliers to have sustainable sourcing procedures in place and to disclose the percentage of sustainably sourced materials they use. Sustainable sourcing is determined by assessing relevant ISO certifications (ISO 9001, 14001 and 45001) and/or Certificates of Origin to ensure responsible practices. Other KPIs will include our value chain partners’ participation in our awareness programmes.

Communicating progress

We assess the progress of our responsible supply chain activities by engaging with suppliers via email, meetings and dedicated engagement sessions. These channels allow us to communicate our actions and to drive progress based on suppliers’ feedback about the potential roadblocks or improvements related to our initiatives. We do not currently engage directly with workers across the value chain.

Looking ahead

We are preparing to undertake the certification process for the Responsible Steel initiative. With an initial gap analysis now conducted, our next step is to close gaps and to prepare our organisation for a Responsible Steel site accreditation audit.

Affected communities in the IJmond region

Why this topic matters

Our activities have (potential) adverse impacts on local communities. ‘Affected communities’ mainly refers to the communities living near TSIJ, which is located on the largest single industrial estate in the Netherlands; simultaneously located in the municipalities of Heemskerk, Beverwijk and Velsen. However, apart from TSIJ, we also recognise (potential) adverse impacts on communities around the 20 TSDE sites where our steel is further processed for high quality applications.

We recognise that there is an expectation for TSN to contribute to a cleaner living environment. Our aim is to meet environmental laws and regulations at all times and seek to go beyond whenever feasible. Further reducing emissions, minimising nuisance and allaying concerns as much as possible is in the interest of our people as well as our company, especially considering that most of our employees reside in the IJmond region and have family and friends nearby.

To secure our position in the Netherlands and Europe, we must produce steel in a cleaner, future-proof and responsible manner. We can only succeed when there is a healthy balance between the interests of people, the environment, the community and our company. Over time, we have therefore intensified our contact with local residents. We engage with these residents, as well as authorities, experts and other organisations around us, to ensure that we are focusing on the right areas to minimise our negative impact on the community in which we operate.

In our initial DMA, we noticed that next to further improving our environmental performance, health is becoming an increasingly important subject in society and these concerns have our attention. We actively engage with our stakeholders on this matter. As TSN's steel production currently relies on blast furnace technology, which contributes to emissions and pollution, this chapter should be read in conjunction with chapters Climate change and Pollution.

How we manage this topic

Approach

We continue to engage with local residents, authorities and other organisations to ensure that we are focusing on the right areas to minimise our impact on others in the community.

Process for engaging with affected communities

TSN is on the threshold of a new era of producing steel with drastically fewer CO<sub>2</sub> emissions, reduced pollution levels and increased circularity. To reach our sustainability goals, we rely on intensive coordination and collaboration with our many stakeholders. Especially in this transitional period, we are committed to a continuous dialogue with our stakeholders, so we can determine which topics matter to them and gain support for our sustainability plans and ambitions. Accordingly, we have structural consultation processes in place with various stakeholder groups (see 'Stakeholder engagement' within our management review).

Complaints procedure

Residents experiencing disturbances from our operations in IJmuiden can report issues to us through multiple channels, including at our information desk in Wijk aan Zee, by phone or by using the complaint form on our website. We investigate all complaints and aim to trace the source of the disturbance promptly and accurately, taking necessary measures as quickly as possible. We use data measurements as well as complaints to improve processes wherever feasible. For instance, noise disturbances are primarily associated with incidents during materials handling, but can also result from whistling, humming and buzzing sounds from process equipment. We take steps to determine possible noise sources, such as installing sound meters on cranes involved in scrap processing, and to reduce noise, such as by investigating the possibility of building dampers in certain installations.

Remediation

Besides actively engaging with affected communities, TSN recognises the importance of remediating negative impacts. We therefore support and encourage affected communities to communicate any such impacts to us.

Ensuring dialogue and provision of information

Scope

This covers the affected communities around our TSIJ site.

Actions

Providing and gathering information

TSN actively engages with IJmond residents to listen to their concerns and involve them in site developments from an early stage. We raise awareness of our sustainable transition plans, gather feedback and involve the community in our Green Steel Plan. For details of our key actions to ensure dialogue and information provision, see the initiatives under our Roadmap programme as described in chapter Pollution.

We assess the effectiveness of our engagement by analysing stakeholder sentiment on topics including economic value generation, sustainable steel production and health impacts from emissions. We also perform regular surveys, work with a research partner to gather input from affected communities and actively monitor outcomes of our engagement activities to ensure we are communicating updates and plans clearly and effectively.

Strengthening relations with the region

TSN is committed to maintaining a strong and lasting relationship with surrounding communities and contributing positively to quality of life in the IJmond region. We consider it our corporate responsibility to make an active contribution to local initiatives through sponsorships and donations. Our ongoing support for initiatives in the region includes our Future Generations programme, through which we prioritise sustainable projects that benefit young people in our area. Activities must make a positive contribution to health and well-being, education and/or environment. Donations are granted to initiatives with the broadest and most sustainable impact on the region. In this way, we invest in the future of our neighbours and the environment in which we work. We also actively involve both the local community and the business sector in our initiatives. This includes the sponsoring of Techport, a regional public-private network driving green-industry-related open innovation and education. These and our other initiatives are reviewed annually by an internal steering committee and evaluated together with key community stakeholders (see the ‘Stakeholder engagement’ section of our management review for more details).

# GOVERNANCE



## Business conduct

### Why this topic matters

In light of the significant challenges and uncertainties in the global political and market landscape, including those affecting the steel industry, it is imperative that we operate under high ethical standards. Tata Steel Nederland (TSN) is committed to upholding good governance and fostering an ethical corporate culture to mitigate risks associated with corruption, anti-competitive practices and unethical behaviour.

We have identified two material sub-topics through our double materiality assessment (DMA): business ethics and code of conduct; and anti-bribery and anti-corruption. We disclose details of our performance in each of these areas in this chapter.

### How we manage this topic

#### Approach

Our business ethics governance model is built around the following roles and responsibilities:

- The Chief Executive Officer (CEO) is the responsible board member acting as sponsor of the business ethics governance model.
- The Director Risk & Compliance is directly responsible for implementing the Ethics & Legal Compliance Programme and is responsible for establishing appropriate legal compliance management procedures, guidelines, guidance and manuals. This includes setting the framework, monitoring compliance, providing guidance and driving awareness across the organisation.
- The Director Integrity & Asset Protection (I&AP) investigates suspected breaches and reported unethical behaviour.

We approach business conduct based on three fundamental policies in our organisation covering our two material sub-topics.

#### *TSN Code of Conduct*

The core elements of our governance are anchored in TSN's Code of Conduct. The Code of Conduct guides and governs the conduct of TSN and its workforce in all matters relating to business. It outlines the five core values that underpin the way we carry out our business activities: integrity, pioneering, excellence, unity and responsibility. It also states our commitment to conforming to high ethical standards and our intolerance of bribery or corruption in any form. See 'Business ethics and code of conduct' for more information.

## Our five core values

<b>Integrity</b>	We will be fair, honest, transparent and ethical in our conduct; everything we do must stand the test of public scrutiny.
<b>Pioneering</b>	We will be bold and agile, courageously taking on challenges, using deep customer insight to develop innovative solutions.
<b>Excellence</b>	We will be passionate about achieving the highest standards of quality, always promoting meritocracy.
<b>Unity</b>	We will invest in our people and partners, enable continuous learning and build caring and collaborative relationships based on trust and mutual respect.
<b>Responsibility</b>	We will integrate environmental and social principles into our businesses, ensuring that what comes from the people goes back to the people many times over.



*TSN Confidential Reporting Policy (Whistleblower Policy)*  
TSN uses the Integrity Line confidential reporting system, which is operated by an external, independent service. Employees or third parties can report wrongdoing via a free telephone service or the internet. Reporters are protected according to the procedures outlined in the TSN Confidential Reporting Policy. We continually update this policy to align with national and European Union (EU) law, informing employees via e-learning programmes.

We encourage people to report any actual or potential violations of the TSN Code of Conduct, other policies or laws. Appropriate measures are in place to protect individuals who make such reports, as well as those who assist them and concerned third persons. TSN does not tolerate any form of retaliation against people who report wrongdoing in good faith. We also encourage people to report (suspected) retaliation for raising a concern or for reporting a case to their line manager, a confidential adviser, the Director Risk & Compliance or the Director I&AP. Anyone involved in retaliation will be subject to disciplinary action.

*Commercial Legal Compliance Policy*  
This is an overarching policy that explains TSN's commitment to conducting its business in an honest and ethical manner, with integrity and in conformity with the relevant laws and regulations in all jurisdictions relevant to its business operations. This includes compliance with competition law, anti-bribery/-corruption laws, anti-fraud legislation, data protection laws, export control laws and trade sanctions. The policy also outlines TSN's methods, initiatives and channels for addressing these issues. The Board of Management (BoM) is responsible for its implementation.



**Business ethics and code of conduct**

**Scope**  
This sub-topic covers how we make decisions and how we do business with stakeholders across our value chain, both upstream and downstream.

In our business activities, we have an impact on people, the environment and the supply chain through supplier relationship management. Failure to uphold an ethical corporate culture or to comply with laws and regulations can lead to financial risks including reputational damage, legal liabilities and regulatory penalties.

**Actions**  
To fulfil our business conduct commitments, we regularly assess the need to update our TSN Code of Conduct. Changes can be the result of updates in the Tata Steel Limited Code of Conduct or internal and/or external developments. Ongoing updates ensure that the Code of Conducts evolves with internal and external developments in which we operate.

*Training on our policies*  
When the TSN Code of Conduct and TSN Confidential Reporting Policy were updated in early 2024, all board members and their management teams received tailored training on these new policies and related procedures.

In February 2025, TSN launched an e-learning on the TSN Code of Conduct, to be completed by 12,000 employees and repeated every two years. This e-learning also covers the confidential reporting process and Integrity Line.

**Targets and performance**  
We aim to keep the TSN Code of Conduct up to date and to constantly strengthen our business ethics performance by providing tailored training to our employees. By maintaining these initiatives and improving business processes, we demonstrate our commitment to ethical business practices, integrity and compliance.

**Looking ahead**  
In 2025, we will review how the current policy framework has been implemented in practice. Where necessary, we will introduce targeted improvements. This approach reflects our commitment to continuous learning and responsible business conduct, helping to ensure that our policies remain relevant and effective in a changing environment. Additionally, we will update and refine our existing anti-bribery and corruption policies to align with evolving risks and regulatory expectations.

**Anti-bribery and anti-corruption**

**Scope**  
This sub-topic applies to all decision-making within TSN, as well as how we conduct and create impact via business relationships both upstream and downstream in our value chain.

TSN faces financial and reputational risks if we fail to comply with laws and regulations, and, as such, we do not tolerate any form of bribery or corruption. This commitment is reflected in the TSN Code of Conduct and Commercial Legal Compliance Policy, supported by specific actions. Moreover, acting with integrity is not only a legal obligation but a moral imperative: engaging in bribery or corruption is fundamentally unethical and goes against our core values. High standards of ethics and integrity are therefore firmly embedded in the way we do business.

**Actions**  
TSN has several strict rules and regulations to support our employees in maintaining the integrity of our business decisions and transactions and to ensure adherence to anti-corruption and anti-bribery laws in all jurisdictions where the company operates. These documents and procedures, which are internally shared with and available for employees, outline steps to prevent, detect, investigate and report any misconduct.

*Internal Anti-Fraud & -Corruption Manual*  
This manual is intended for the use of all personnel in Tata Steel Europe. It provides employees with a basic understanding of international and national laws on fraud, bribery and corruption. It also supports employees in identifying and addressing potential risk areas in business dealings and requires employees to assess risks and work with their line managers and the Compliance team to resolve issues.

*Gifts & Hospitality Policy*  
This policy aims to ensure appropriate business conduct in giving and receiving gifts and hospitality and to reduce the risk of corruption and bribery. All gifts and hospitality must be proportionate and appropriate and have a genuine business purpose, in order to prevent influencing or appearing to influence impartial decision-making. Employees must obtain authorisation where required and seek guidance from their line manager or Legal & Compliance if concerns arise. In addition, each business unit must maintain a Gifts & Hospitality Register.

*Commercial Rebate Policy*  
This policy applies to all commercial rebates negotiated and registered on behalf of TSN. It provides information on how rebates should be structured in order to minimise risks of anti-competitive behaviour. TSN companies may only enter into rebate arrangements with customers

if these are approved and authorised according to the policy, which details a framework of clearly defined and approved operating procedures for commercial staff. In areas where TSN has market power (dominance), the policy includes specific provisions to avoid anti-competitive behaviour, including avoiding loyalty rebates and exclusivity.

*Competition Law Compliance Programme*  
TSN's policy is to comply with competition laws in any jurisdiction where we operate. Together with Tata Steel Europe's Competition Law Compliance Manual, TSN's policies, guidance notes and training provide a framework to ensure all employees understand and adhere to competition laws, thereby promoting fair and lawful business practices.

**Targets and performance**  
We ensure that anti-trust compliance and, anti-bribery and anti-corruption compliance remain an important focus area across our operations. All allegations of anti-trust, infringements, bribery or corruption are subject to thorough and independent investigation by the I&AP function. Substantiated breaches of anti-trust, infringements, bribery or corruption are generally followed up with corrective actions as appropriate, including disciplinary actions, review and enhancement of internal controls and policies, additional training or other measures that aim to further promote a culture of ethics and professional integrity.

During the reporting year, there were no convictions or fines related to anti-trust, infringements, bribery or corruption applied to TSN or our employees.

Anti-trust compliance, anti-bribery and anti-corruption compliance and integrity investigations are reported quarterly to the BoM and biannually to the Audit Committee.

**Looking ahead**  
Supported by our Legal & Compliance department, we will continue to strengthen ethical behaviour within all layers of our organisation, drive a culture of high ethical standards and foster a sense of trust and accountability. In 2025–2026, our priority is to refine our anti-bribery and -corruption policies to align with evolving risks and regulatory expectations, and then to test and monitor the implementation and impact of these measures. Where necessary, we will initiate targeted improvements as part of our continuous cycle of evaluation and enhancement.



# SUPERVISORY BOARD REPORT



The financial year 2024-2025 (FY2025) was a challenging year for TSN in several respects. The profitability of the company was severely impacted by continuing adverse market conditions and its too high cost structure. TSN closed the year with a loss of EUR 204 million, which is a very disappointing outcome. Challenges also regarded the company's environmental performance, in particular the enforcement measures imposed on the Cokes and Gas Plant 1 and 2 (CGP1 and CGP2). Next to these challenges, TSN is in ongoing and constructive discussions with the Dutch government and its parent company Tata Steel Ltd. on financial support for the realisation of the first phase of the Green Steel Plan for the decarbonisation of the IJmuiden site.

The abovementioned developments were also reflected in the Supervisory Board's activities. Given these exceptional circumstances, the Supervisory Board intensified its activities. This is inter alia reflected in an increased number of Supervisory Board meetings with and without the Board of Management as well as deep dives on specific topics. The Supervisory Board advised the Board of Management on important strategic decisions.

With regard to enforcement measures imposed on Tata Steel IJmuiden B.V. (TSIJ), the Supervisory Board in particular took note of the two orders under penalty to end exceedance of and stay below emission thresholds for MVP1 and MVP2 substances at the CGP1 and CGP2. In addition, the Supervisory Board took note of the notice issued by Environmental Agency North Sea Channel Area on alleged non-compliances at the CGP2, concerning the state of maintenance of the oven walls, which must be remedied within 12 months pursuant to the notice, failing which the Environmental Agency North Sea Channel Area will consider revoking the permit for CGP2.

The Supervisory Board was also informed that TSIJ's appeal against the third order under penalty to prevent green pushes at CGP1 and CGP2 was rejected by the relevant court and that the TSIJ filed an appeal against the judgment. The Supervisory Board paid specific attention to developments regarding living environment aspects, including (i) the second report by the IJmond Health Expert Group, proposing to increase transparency by making health effect reporting by the industry mandatory, (ii) the submission of the Environmental Impact Assessment, setting out the environmental and health effects of the decarbonisation assets, and the commissioning of the 1,000-metre-long and 18-metre-high windbreaker at TSIJ's premises to reduce dust emissions.

Further to the challenging market and to improve the company's environmental performance, the Supervisory Board was informed by the Board of Management's plans and actions to realise a major transformation and organisational change to a smaller, centrally-led and more effective organisation. In this new organisation, the Health

Safety Security and Environment department is strengthened and a dedicated Risk and Compliance department is set up for TSN as a whole, to monitor compliance with applicable laws and regulations, led by an externally recruited seasoned Director Risk & Compliance appointed per 1 June 2025. The Supervisory Board was also informed on root causes and closely monitored the legal and technical measures taken as well as the development of a future oriented plan including all measures to improve the CGP1 and CGP2's environmental performance.

The decarbonisation strategy for the IJmuiden site was frequently discussed by the Supervisory Board. Discussions with the Dutch Ministry of Climate and Green Growth for tailor-made support for the first phase of decarbonisation, and related administrative procedures, continued and the Supervisory Board was kept up to date on the progress made.

The Supervisory Board closely monitored TSN's safety performance. Particular attention was paid to the development and implementation of the safety programme TrueSafe that was announced in December 2024.

Another important subject discussed by the Supervisory Board was TSN's financial performance which was under high pressure during the year, inter alia due to the high influx of Chinese steel in the European market, low demand and the company's high cost base compared to its EU peers. Around the mid of the financial year the company was confronted with a very tight cash position and the Board of Management in close consultation with the Supervisory Board took corrective measures resulting in a sound cash position at year-end.

The Supervisory Board monitored the measures prepared by the Board of Management by means of a major transformation programme to structurally reduce cost and increase productivity and restore the company's competitiveness. Regrettably, a significant FTE reduction is an inevitable part of this programme. The measures are needed in the interest of the future of TSN whilst at the same time the Supervisory Board recognises the impact of these job losses on the employees and their families.

The Supervisory Board held 6 regular meetings during FY2025 and 8 extra meetings, with and without management. With the exception of two meetings, all Supervisory Board members were present at each of these Supervisory Board meetings. The Supervisory Board also had regular dialogues with employees other than the Board of Management, including the Central Works Council. By rotation, individual Supervisory Board members attended the Central Consultative Meetings between the BoM and the Central Works Council, providing information on the meetings of the Supervisory Board.



**Audit Committee**

The Audit Committee held six meetings during the financial year 2024-2025. The meetings were attended (at least in part) by the CEO and the CFO, the external auditor PwC, the internal auditor, the Deputy CFO and the Director Group Finance. The Chair of the Audit Committee, Mr. Dijkhuizen, has on a regular basis separate meetings with the internal and the external auditor.

As part of its tasks, the Audit Committee reviewed company's quarterly and annual financial reporting, including impairment testing and going concern assessment. The Audit Committee concurred with the conclusions drawn by the Board of Management that no impairment was required and that the financial statements were prepared on a going concern basis, however stressed the importance of the successful implementation of the transformation programme.

The Audit Committee reviewed the internal audit reports and risk reports. Particular attention was paid to the effectiveness of the company's internal risk management and control systems, which will be further strengthened by the appointment of a Director Risk & Compliance per 1 June 2025, for TSN as a whole. Effectiveness of the risk and compliance function will be improved by centralisation of the risk and compliance function and the implementation of an enhanced integrated Risk and Control framework.

The Audit Committee reviewed the audit plans of the external auditor and internal auditor before submission to the Supervisory Board for approval.

The Audit Committee paid close attention to TSN's financial performance and its cash position which was limited around the middle of the financial year. The Audit Committee monitored the implementation of corrective measures by the Board of Management, resulting in a sound cash position at the year-end.

During each meeting, the Audit Committee paid particular attention to the progress made with the implementation of the CSRD sustainability reporting. Other subjects reviewed by the Audit Committee were fraud prevention and taxation.

**Remuneration Committee**

During the year, the Remuneration Committee was established as a standing committee of the Supervisory Board. The Supervisory Board advises the shareholder on the remuneration of the members of the Board of Management. The Remuneration Committee undertakes preparatory work to facilitate the Supervisory Board's decision- making on this advice.

The Remuneration Committee held three meetings. The meetings were attended by (at least in part) the CEO, the TSN HR Director and the TSL VP Human Resources. The Remuneration Committee assessed the functioning of the individual members of the Board of Management, made a proposal with regard to the remuneration for the year 2024-2025 and prepared a remuneration policy to be pursued for the year 2025-2026.

After the year 2024-2025, further to the envisaged new organisational setup following the restructuring, the composition of the Board of Management was reduced from five to four members as of 1 July 2025. In this new structure, the Board of Management consists of the positions of Chief Executive Officer, Chief Financial Officer and the two newly created positions Chief Operations Officer and Chief Commercial Officer. The new structure is aimed at accelerating the transition of TSN into a leading and sustainable steel company. The Remuneration Committee led the process to determine the appropriate candidates for the four positions and reported its findings to the Supervisory Board. Following this process, Mr. Van den Berg was confirmed in the position of CEO, Mr. Turkesteen was confirmed in the position of CFO and Mr. Latchman was appointed to fulfil the position of Chief Operations Officer. For the position of Chief Commercial Officer, external candidate Mr. Bernscher was selected as the preferred candidate and appointed by the shareholder as a member of the Board of Management, upon the Supervisory Board's advice and following consultation of the Central Works Council.

As of 1 July, the position of Managing Director of TSIJ and Managing Director of TSDE expired and subsequently, Tom Eussen and Gunilla Saltin stepped down as members of the Board of Management. The Supervisory Board expresses its gratitude to Tom Eussen and Gunilla Saltin for their invaluable contributions to Tata Steel Nederland.

**Financial statements**

For FY2025, the consolidated income statement shows a net loss after taxation of €204m compared to a net loss after taxation of €556m for the financial year 2023-2024, due to adverse market conditions and persistent low steel spreads.

Pursuant to Article 29 of the Articles of Association, we hereby present the Annual Accounts for adoption by the General Meeting of Shareholders of TSN. The members of the Supervisory Board, after discussion with the external auditors, have approved these Annual Accounts. The auditors, PricewaterhouseCoopers N.V., have audited the Annual Accounts for 2024-2025 and have issued an unqualified auditor's opinion.

We recommend that the General Meeting of Shareholders adopts the Annual Accounts for FY2025 as presented, and discharges the members of the BoM and the Supervisory Board of responsibility in respect of their management and supervision respectively.

The Supervisory Board thanks the BoM and all TSN employees for all their efforts during the FY2025.

Supervisory Board

# ANNUAL ACCOUNTS



## Consolidated income statement

For the year ended March 31, 2025

	Note	2025 €m	2024 €m
Revenue	1	6.273	5.943
<b>Total income</b>		<b>6.273</b>	5.943
Changes in inventory of finished goods and work in progress	2	(55)	(420)
Raw materials and consumables	2	(3.192)	(2.974)
Maintenance and other external charges	2	(1.285)	(1.467)
Employee benefits expense	4	(1.186)	(1.214)
Depreciation and amortization expense	2	(296)	(264)
Other expenses	2	(462)	(324)
<b>Total expenses</b>		<b>(6.476)</b>	(6.663)
Finance costs	5	(55)	(41)
Finance income	5	-	14
Share of post-tax results of joint ventures and associates	10(iii)	1	4
<b>Profit/(Loss) before taxation</b>		<b>(257)</b>	(743)
Taxation	6	53	187
<b>Profit/(Loss) after taxation</b>		<b>(204)</b>	(556)

All references to 2025 in the Financial Statements, the Presentation of accounts and accounting policies and the related Notes 1 to 36 refer to the financial year ended 31 March 2025 or as of 31 March 2025 as appropriate (2024: the financial year ended 31 March 2024 or as at 31 March 2024).

## Consolidated statement of comprehensive income

For the year ended March 31, 2025

	2025 €m	2024 €m
<b>Profit/(Loss) after taxation</b>	<b>(204)</b>	(556)
<b>Items that will not be reclassified to profit or loss:</b>		
Actuarial gains on defined benefit pension and other post-retirement plans	1	1
Income tax relating to items not reclassified	-	(1)
	<b>1</b>	-
<b>Items that may be reclassified subsequently to profit or loss:</b>		
(Losses)/Gains arising on cash flow hedges	2	27
Change in consolidation* and Exchange rate movements on currency net investments	2	114
Income tax relating to items that may be reclassified	-	(7)
	<b>4</b>	134
<b>Other comprehensive income / (expense) for the year net of tax</b>	<b>5</b>	134
<b>Total comprehensive income / (expense) for the year</b>	<b>(199)</b>	(422)
Attributable to:		
Owners of the company	<b>(199)</b>	(421)
Non-controlling interest	-	(1)

\* Change in consolidation in 2024 includes € 113m related to the legal merger of British Steel Nederland International BV into Tata Steel Nederland BV.

Notes and related statements forming an integral part of these consolidated accounts appear on pages 124 to 154.



Consolidated balance sheet

As at 31 March

	Note	2025	2024
		€m	€m
<b>Non-current assets</b>			
Goodwill	7	8	8
Intangible assets	8	63	66
Property, plant and equipment	9	2.849	2.810
Equity accounted investees	10	46	47
Other investments	11	2	2
Other non-current assets	12	2	2
Retirement benefit assets	31	1	3
Non-current tax asset	14	154	-
Deferred tax asset	23	87	78
		3.212	3.016
<b>Current assets</b>			
Assets classified as held for sale	17	-	5
Inventories	13	1.417	1.621
Trade and other receivables	15	332	426
Current tax assets	14	5	233
Cash and short-term deposits	16	428	104
		2.182	2.389
<b>Total assets</b>		<b>5.394</b>	<b>5.405</b>
<b>Current liabilities</b>			
Borrowings	19	45	130
Trade and other payables	18	1.476	1.529
Current tax liabilities	14	9	136
Retirement benefit obligations	31	2	2
Provisions for liabilities and charges	22	173	35
		1.705	1.832
<b>Non-current liabilities</b>			
Borrowings	19	446	113
Deferred tax liabilities	23	3	3
Retirement benefit obligations	31	57	61
Provisions for liabilities and charges	22	132	146
Other non-current liabilities	20	48	48
Deferred income	24	2	2
		688	373
<b>Total Liabilities</b>		<b>2.393</b>	<b>2.205</b>
<b>Net assets</b>		<b>3.001</b>	<b>3.200</b>
<b>Equity</b>			
Called up share capital	25	388	388
Share premium account		17	17
Other components of equity		2.596	2.795
<b>Total equity</b>		<b>3.001</b>	<b>3.200</b>

Notes and related statements forming an integral part of these consolidated accounts appear on pages 35 to 66.

Consolidated statement of changes in equity

	Called-up share capital	Share premium account	Retained earnings	Hedging reserve	Translation reserves	Total	Non-controlling interests	Total equity
	€m	€m	€m	€m	€m	€m	€m	€m
<b>Balance as at 1 April 2023</b>	<b>388</b>	<b>17</b>	<b>3.218</b>	<b>(18)</b>	<b>16</b>	<b>3.621</b>	<b>1</b>	<b>3.622</b>
Profit/(Loss) after taxation	-	-	(556)	-	-	(556)	-	(556)
Other comprehensive result for the year	-	-	113	20	2	135	(1)	134
Total comprehensive result for the year	-	-	(443)	20	2	(421)	(1)	(422)
<b>Balance as at 31 March 2024</b>	<b>388</b>	<b>17</b>	<b>2.775</b>	<b>2</b>	<b>18</b>	<b>3.200</b>	<b>-</b>	<b>3.200</b>
Profit/(Loss) after taxation	-	-	(204)	-	-	(204)	-	(204)
Other comprehensive result for the year	-	-	1	2	2	5	-	5
Total comprehensive result for the year	-	-	(203)	2	2	(199)	-	(199)
<b>Balance as at 31 March 2025</b>	<b>388</b>	<b>17</b>	<b>2.572</b>	<b>4</b>	<b>20</b>	<b>3.001</b>	<b>-</b>	<b>3.001</b>

The authorised share capital of the Company at 31 March 2025 amounts to €1,300,000,000 (31 March 2024: €1,300,000,000) and consists of 130,000,000 Ordinary shares of €10.00 each of which 38,760,710 Ordinary shares were issued and fully paid up. All the outstanding Ordinary shares were held by TSNH.

Consolidated statement of cash flows

For the financial year ended 31 March

	Note	2025	2024
		€m	€m
Profit/(Loss) after taxation		(204)	(556)
Adjustments for:			
Tax	6	(53)	(187)
(Profit)/Loss on disposal of property, plant and equipment	2	(17)	(3)
Interest income	5	-	(14)
Interest expense	5	55	41
Share of results of joint ventures and associates	10(iii)	(1)	(4)
Depreciation and amortisation including impairments (net of grants released)	2	296	264
Movement in pension prepayments and provisions		130	(47)
Movement in loose plant, tools and spares		(19)	(6)
Movement in inventories		202	482
Movement in receivables		96	122
Movement in payables		(9)	(257)
Rationalisation costs provided	22	(4)	23
Utilisation of rationalisation provisions	22	(6)	(4)
Cash generated from / (used in) operations		466	(146)
Interest paid		(42)	(35)
Interest element of lease rental payments		(8)	(5)
Taxation paid		(8)	(2)
Net cash flow from operating activities		408	(188)
Investing activities			
Purchase of property, plant and equipment	9	(300)	(655)
Sale of property, plant and equipment	9	23	5
Purchase of other intangible assets	8	(4)	(4)
Dividends from joint ventures and associates	10	2	1
Interest received		-	14
Net cash flow from investing activities		(279)	(639)
Financing activities			
Proceeds of loans from Group companies		150	-
Repayment of loans to Group companies		(150)	(21)
New loans (including drawdowns of revolving credit facility)		325	72
Repayment of borrowings (including repayments of revolving credit facility)		(97)	-
Principle lease repayments	30	(24)	(19)
Net cash flow generated from financing activities		204	32
Increase / (Decrease) in cash and cash equivalents		333	(795)
Change in consolidation*		-	41
Total cash movement		333	(754)
Cash and cash equivalents at beginning of period		95	849
Cash and cash equivalents at end of period		428	95
Cash and cash equivalents consist of:			
Cash and short-term deposits	16	428	104
Bank overdrafts	30	-	(9)
		428	95

Notes and related statements forming an integral part of these consolidated accounts appear on pages 35 to 66.

# Presentation of consolidated accounts and accounting policies

## I Introduction

Tata Steel Nederland BV ('TSN') having its registered office (statutaire zetel) in IJmuiden officiating at Wenckebachstraat 1, 1951 JZ Velsen-Noord, the Netherlands, and forms part of the Tata Steel Group. Its registration number at the Chamber of Commerce is 34005278. The ultimate parent company is Tata Steel Limited ('TSL'), which is a company incorporated in India with shares listed on the BSE Ltd (formerly the Bombay Stock Exchange Ltd, Mumbai) and the National Stock Exchange of India, and with global depository receipts listed on the London and the Luxembourg Stock Exchanges. The shares of TSN are held by Tata Steel Netherlands Holdings BV ('TSNH').

TSN and its subsidiaries ('the Group') form an international steel group that manufactures, processes and distributes steel products.

The 2025 Annual Accounts of TSN were authorised for issue by the Board of Management on 25 July 2025.

## II Basis of preparation

TSN is a private limited company incorporated in the Netherlands. The consolidated financial statements of the Group for the year ended 31 March 2025 comprise the Company and its subsidiaries and the Group's interest in its joint venture and associated undertakings.

The consolidated accounts have been prepared in accordance with International Financial Reporting Standards ('IFRS') as adopted by the European Union ('EU') and interpretations issued by the International Financial Reporting Interpretations Committee ('IFRIC'). The functional and presentational currency of the Company is the Euro.

The financial statements have been prepared under the historical cost convention, unless otherwise stated.

The Group has prepared the financial statements under the IFRS accounting policies set out below and these policies have been applied consistently to all the periods.

### Going concern

The TSN Group is mainly centred in the Netherlands but includes manufacturing assets elsewhere in mainland Europe ('MLE') and the United States, along with other international sales offices.

### Tailor-made support

Discussions with the Netherlands government on the tailor-made support for the proposed decarbonisation and environmental project of Tata Steel Nederland B.V. ('TSN') are ongoing. On February 20, 2025, the Ministry of Climate and Green Growth submitted a letter to the Dutch parliament on the progress of negotiations including next steps towards

a Joint Letter of Intent and the process with the European Commission. In relation to the likely investments required for the decarbonisation of TSN driven by regulatory changes in Europe and the Netherlands, the scenarios consider that the Dutch Government will provide a certain level of financial support to execute the decarbonisation strategy.

### Orders under penalty Coke and Gas Plants

The Dutch Environment Agency ('EA') has sent a notice on non-compliances regarding certain state of maintenance of the TSN's coke and gas plant at Tata Steel IJmuiden B.V. ('TSIJ'). Further to the notice, it has given TSIJ B.V. a period of 12 months to remedy the non-compliances, failing which, the permit for operating the coke and gas plant can get revoked. TSIJ B.V. is currently working on various actions in connection with the Orders and Notices received including legal remedies of filing objections and injunctive reliefs against the orders under penalty and notice.

Considering the actions which TSIJ is pursuing within the remediation period and given the ongoing discussions to arrive at a comprehensive solution for CO<sub>2</sub> emissions and environmental concerns with the Dutch Government, the Company believes that the Orders and the Notice are unlikely to lead to an early closure of the Coke and Gas Plants and pose an impediment to its current business operations.

### Financial position of TSN

The directors have considered a number of possible scenarios for the financial position of TSN, with reference to the Group's Annual Plan and the mitigating actions the Group could take to limit any adverse consequences to liquidity. The base case assumes no improvement in trading conditions over the next 18 months given the general uncertain macro-economic outlook and the current challenging conditions in the European steel market. In order to counter the effects of the current subdued market the MLE Business recently launched a Transformation programme which targets improvements in the areas of gross margin and fixed costs in order to deliver improved profitability for 2025/26 and beyond. Furthermore, the MLE Business ended 2024/25 with a solid net debt position of € (63) million (2024: € (139) million) and a positive cash balance of € 428 million.

In addition, Tata Steel Nederland has access to a revolving credit facility ('RCF') with a maximum limit of € 550 million. As of 31 March 2025 € 310 million of this facility was drawn. The company also has non-committed overdraft facilities available amounting to € 68 million (undrawn per 31 March 2025).

Furthermore, Tata Steel IJmuiden B.V. and certain other subsidiaries of Tata Steel Nederland continue to have access to a trade receivables securitization arrangement, with a maximum amount of € 600 million on a non-recourse basis. At the end of the financial year 2024/2025 € 524 million of this facility was utilized (prior year: € 463 million).



The Board of Management considered carefully TSN’s ability to meet its liabilities as they fall due, based on the cash flow and profit forecasts. The future funding requirements of the Group in the near term are assessed, based on financial forecasts covering 12 months from the date of this report. Under all scenarios, including severe but plausible downside scenario’s, the directors of the Company believe that TSN has access to adequate liquidity.

For these reasons, the directors have concluded that there is a reasonable expectation that the TSN has adequate resources to continue operating for the near future and therefore it is appropriate to prepare the accounts on a going concern basis.

III New standards and interpretations applied

The following new International Accounting Standards (‘IAS’) and new IFRSs have been adopted in the current year:

Change	Standard	Effective Date*
Liability in a Sale and Leaseback (Amendment)	IFRS 16	1 Jan 2024
Classification of Liabilities as Current or Non-Current (Amendment)	IAS 1	1 Jan 2024
Non-Current liabilities with Covenants (Amendments)	IAS 1	1 Jan 2024
Supplies Finance Arrangements (Amendments)	IAS 7	1 Jan 2024

\* periods commencing on or after

TSN has adopted the above amendments. In accordance with the transitional provisions, the amendments have been adopted retrospectively to the financial statements. Comparative amounts have not been restated, and there was no impact on the current opening reserves amount on adoption. Neither of these amendments had a material impact on the TSN financial statements.

IV New standards and interpretations not applied

The International Accounting Standards Board (‘IASB’) has issued the following Standards, which are relevant to the Group’s reporting but have either not been applied as they have not been adopted for use in the EU in the year ended 31 March 2025, or have an effective date after the date of these financial statements:

Standard	Change	Effective Date*
IAS 21	Lack of Exchangeability (Amendment)	1 Jan 2025
IFRS 9 and IFRS 7	Classification and Measurement of Financial Instruments (Amendment)	1 Jan 2026
IFRS 19	Subsidiaries without Public Accountability: Disclosures (New Standard)	1 Jan 2027
IFRS 18	Presentation and Disclosure in Financial Statements (New Standard)	1 Jan 2027

\* periods commencing on or after

Management have performed a review of the expected impact from other standards and interpretations not applied as shown above. Management do not expect a material impact as a result of new standards and interpretations not applied, except for the adoption of IFRS 18, for which the Group is still assessing the potential impact to its financial statements. TSN does not plan to early adopt any standards or amendments.

V Use of estimates and critical accounting judgements

In the application of the Group’s material accounting policies, which are described in section VI, the directors are required to make judgements (other than those involving estimations) that have a significant impact on the amounts recognised and to make estimates and assumptions about the carrying amounts of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised if the revision affects only that period, or in the period of revision and future periods if the revision affects both current and future periods.

Critical judgements in applying the Group’s accounting policies The critical judgements, apart from those involving estimations (which are presented separately below), that the Board of Management has made in the process of applying the Group’s accounting policies and that have the most significant effect on the amounts recognised in the financial statements are presented below.

Definition of cash generating units (‘CGU’) A significant part of the Group’s capital is invested in property, plant and equipment and intangible assets (including goodwill). Determining whether these assets are impaired requires an estimation of value in use or fair value less cost of disposal of the CGU to which the asset relates. A CGU is the smallest identifiable group of assets that generates cash inflows that are independent of the cash inflows from other assets or groups of assets. The identification of CGUs involves significant judgement. Key factors in determining CGU’s are operational interdependence of the integrated production chain and alignment with internal management reporting. The definition of CGUs is reassessed when there is a significant change in the way the business is managed or in the structure of operations. For the Group CGUs are usually taken to be individual businesses or legal entities, although these are combined or split into base entities, where deemed appropriate to reflect the specific economic risks or operational inter-dependence of locations and operations based on the governance structure and lines of reporting. This process of defining CGUs requires the exercise of significant judgement.

Key sources of estimation uncertainty The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting period end that may have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities are discussed below. This includes assumptions in respect of the transition to a low carbon economy, which may impact critical judgements and key estimates, disclosure, recognition or derecognition of assets and liabilities and measurement of such assets and liabilities.

If the support from the Dutch government would not be as expected, then there would be a material impact on the valuation of property, plant and equipment. This could also have a significant impact on how the current decarbonization plans could be realized. Furthermore, the ability to retain critical permits and the timing and availability of permits required to realize decarbonization plans are considered key sources of estimation uncertainty.

1) Provisions Estimates in calculating provisions for environmental remediation, legal claims and employee benefits are based on previous experience and third-party advice and are reassessed on a regular basis. Judgement is required in assessing the costs and the timing of these costs. Further details on the Group’s provisions can be found in note 22.

A provision is recognised when the Group has a present obligation, legal or constructive, as result of a past event and it is probable that the outflow of resources will be required to settle the obligation, in respect of which a reliable estimate can be made. They include provisions on restructuring and rationalisation, legal claims, environmental provisions and employee benefits are based on previous experience and third-party advice and are reassessed on a regular basis. Judgement is required in assessing the costs and the timing of these costs. All provisions are reviewed at each balance sheet date and adjusted to reflect the current best estimates.

2) Recognition of deferred tax assets The recognition of deferred tax assets is subject to estimations of the future available taxable profits that the directors consider to be more likely than not to occur, based on the Group’s annual plans and future forecasts. Further information can be found in note 23.

3) Post-retirement benefits The Group’s retirement benefit obligations are assessed by selecting key assumptions. The selection of inflation, salary growth, and mortality rates are key sources of estimation uncertainty which could lead to a material adjustment in the defined benefit obligations within the next financial year. The Group sets these judgements with close reference to market conditions and third-party actuarial advice. The Group’s defined benefit obligations are discounted at a rate set by reference to market yields at the end of the reporting period on high quality corporate bonds. The most significant criteria considered for the selection of bonds include the issue size of the corporate bonds, quality of the bonds and the identification of outliers which are excluded.

4) Impairment of non-current assets Value in use and fair value less cost of disposal calculations requires an estimation of future cash flows expected to arise from the CGU and a suitable discount rate to calculate present value. The present value is sensitive to changes in the discount rate used in the value in use models, the forecast profitability of the Group in the third year of the Group’s Annual Plan, and the expected impact of decarbonisation on the Group. Further details on the Group’s impairment review, key assumptions, and sensitivity analyses are set out in note 9. In respect of impairment of investments in the Company accounts, judgement is required around the relevant enterprise value of the TSN Group. The detailed accounting policies for each of these areas, are outlined in section VI below.

5) Property, plant, and equipment TSN continues to develop its assessment of the potential impacts of climate change and decarbonisation strategy and has considered such impacts when preparing its consolidated financial statements.

TSN has a public commitment to achieve net-zero CO<sub>2</sub> emissions for Scope 1 and 2 by 2045. The Company is committed to transitioning in a phased manner out of blast furnace operations to steel making using direct reduced iron technology and electric smelting, with an eventual transition to Green Hydrogen depending on availability and economics. It is currently engaged with multiple technology and engineering partners to complete detailed evaluation and engineering, implementation planning and costing of the project.

TSN is also undertaking a comprehensive project to reduce dust and other emissions from its plant to make it future ready. The Roadmap program took a big step forward with the completion of the Windbreaker around raw material storage to reduce dust emissions. Also, significant progress has been made on the DeNOX installation at the Pellet Plant. The DeNOx installation aims to reduce nitrogen oxide emissions by capturing NOx compounds at the Pellet Plant.

Assumptions in respect of climate- and regulatory change and the transition to a low carbon economy may impact the Company’s key estimates and result in changes to estimated useful lives. Climate-related risks, in particular those arising from transitioning to a lower-carbon economy, are considered when estimating the useful lives of the assets affected.

VI Critical accounting policies

(a) Property, plant, and equipment

Property, plant and equipment is recorded at fair value on acquisition less accumulated depreciation and any recognised impairment loss. Cost includes professional fees and, for assets constructed by the Group, any related works to the extent that these are directly attributable to the acquisition or construction of the asset. Amounts incurred in connection with capital projects that are not directly attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended (which the Group refers to as ‘commissioning costs’ and which include expenses such as initial operating losses incurred while technical deficiencies on new plant are rectified and incremental operating costs that are incurred while the new plant is operating at less than full capacity) are written off to profit and loss as incurred. Advances paid for acquisition or construction of an item of property, plant and equipment are initially recognised as capital advance and transferred to asset under construction when transfer of risk and reward of the asset takes place and an identifiable asset is created. Assets in the course of construction are depreciated from the date on which they are ready for their intended use.

The gain or loss arising on disposal of an asset is determined as the difference between the sale proceeds and the carrying amount of the asset and is recognised in profit and loss.

Included in property, plant and equipment are loose plant and tools which are stated at cost less amounts written off related to their expected useful lives and estimated scrap value and also spares, against which impairment provisions are made where necessary to cover slow moving and obsolete items.

Subsequent costs are included in the carrying value of an asset when it is probable that additional future economic benefits will flow to the Group and the cost of the item can be measured reliably. All other repairs and renewals are charged to profit and loss as incurred.

(b) Depreciation, amortisation and impairment of property, plant and equipment and other intangible assets (including goodwill)

Depreciation or amortisation is provided to write off, on a straight-line basis, the cost of property, plant and equipment and other intangible assets, including right-of- use assets, to their residual value. These charges are commenced from the dates the assets are available for their intended use and are spread over their estimated useful economic lives or, in the case of leased assets, over the lease period if shorter.

Useful lives: the estimated useful lives of assets and residual values are reviewed regularly and, when necessary, revised. Accelerated depreciation or amortisation is provided where an asset is expected to become obsolete before the end of its normal useful life or if events or changes in circumstances indicate that an impairment loss needs to be recognised, as discussed below. No further charges are provided in respect of assets that are fully written down but are still in use.

The estimated useful lives for the main categories of property, plant and equipment and other intangible assets are:

	Life Years
Land and buildings:	
Freehold and buildings that house plant and other works buildings	25
Other freehold and buildings	50
Plant and machinery:	
Iron and steelmaking (maximum)	25
IT hardware and software(maximum)	8
Office equipment and furniture	10
Motor vehicles	4
Other(maximum)	15
Patents and trademarks	4
Product & process development costs and computer software (maximum)	8

At each reporting period end, the Group reviews the carrying amounts of its property, plant, and equipment and other intangible assets to determine whether there is any indication that the carrying amount of those assets may not be recoverable through continuing use. If any such indication exists, the recoverable amount of the asset is reviewed to determine the extent of the impairment loss (if any). Where the asset does not generate cash flows that are independent from other assets, the Group estimates the recoverable amount of the CGU to which the asset belongs. Other intangible assets (including goodwill) with indefinite useful lives are tested for impairment annually and whenever there is an indication that the asset may be impaired.

Impairment: Value in use and fair value less cost of disposal calculations includes assumptions related to the decarbonization strategy of TSN. Key assumptions made represent the most likely impact from decarbonization now. However, assumptions may change over time, which could result in changes to value in use and fair value less cost of disposal calculations in future periods and affect impairment assessments.

Recoverable amount is the higher of fair value less cost of disposal and value in use. In assessing value in use and fair value less cost to sell, the estimated future cash flows are discounted to their present value using a pre-tax discount rate for value in use and a post-tax discount rate for fair value less cost of disposal, based upon the Group's long term weighted average cost of capital ('WACC'), which also recognises the comparative WACCs of its European peers, with appropriate adjustments for the risks associated with the relevant units. If the recoverable amount of an asset (or CGU) is estimated to be less than its carrying amount, the carrying amount of the asset (or CGU) is reduced to its recoverable amount. An impairment loss is recognised as an expense immediately.

Where an impairment loss subsequently reverses, the carrying amount of the asset (or CGU) is increased to the revised estimate of its recoverable amount, but so that the increased carrying amount does not exceed the carrying amount that would have been determined had no impairment loss been recognised for the asset (or CGU) in prior years. A reversal of an impairment loss is recognised as income immediately, although impairments of goodwill are not subject to subsequent reversal.

(c) Taxation

The tax expense represents the sum of the tax currently payable and deferred tax.

The tax currently payable is based on taxable profit for the year. Taxable profit differs from net profit as reported in the income statement because it excludes items of income or expense that are taxable or deductible in other years and it further excludes items that are never taxable or deductible.

Deferred tax is the tax expected to be payable or recoverable on differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit and is accounted for using the balance sheet liability method. Deferred tax liabilities are generally recognised for all taxable temporary differences. In contrast, deferred tax assets are only recognised to the extent that it is probable that future taxable profits will be available against which the temporary differences can be utilised. Liabilities are not recognised for taxable temporary differences arising on investments in subsidiaries, joint ventures and associates where the Group is able to control the reversal of the temporary difference, and it is probable that the temporary difference will not reverse in the foreseeable future.

Both current and deferred tax items are calculated using the tax rates that are expected to apply in the period when the liability is settled, or the asset is realised. This means using tax rates that have been enacted or substantially enacted by the end of the reporting period. Deferred tax is charged or credited in the income statement, except when it relates to items charged or credited directly to equity, in which case the deferred tax is also dealt with in equity.

Deferred tax assets and liabilities are offset to the extent that they relate to taxes levied by the same tax authority, and they are in the same taxable entity, or a group of taxable entities where the tax losses of one entity are used to offset the taxable profits of another and there are legally enforceable rights to set off current tax assets and current tax liabilities within that jurisdiction.

(d) Retirement benefit costs

The group operates a number of defined benefit and a number of defined contribution pension plans for its employees. Payments to defined contribution retirement benefit schemes are charged as an expense as they fall due.

For defined benefit retirement schemes the cost of providing benefits is determined using the Projected Unit Credit Method, with actuarial valuations being carried out at each reporting period end. The Group applies IAS 19 ‘Employee Benefits’ to recognise all actuarial gains and losses directly within retained earnings, presenting those arising in anyone reporting period as part of the relevant statement of comprehensive income. In applying IAS 19, in relation to retirement benefits costs, the current service cost and net interest cost have been treated as a net expense within employment costs.

Past service cost is recognised immediately to the extent that the benefits are already vested, and otherwise is amortised on a straight-line basis over the average period until the benefits become vested.

The retirement benefit liability recognised in the balance sheet represents the fair value of scheme assets less the present value of the defined benefit obligation as adjusted for unrecognised past service cost. Any asset resulting from this calculation is limited to unrecognised past service cost, plus the present value of available refunds and reductions in future contributions to the plan.

(e) Provisions

Provisions for rationalisation and related measures, environmental remediation and legal claims are recognised when the Group has a present legal or constructive obligation as a result of past events, it is more likely than not that an outflow of resources will be required to settle the obligation, and the amount can be reliably estimated. This involves a series of management judgements and estimates that are based on past experience of similar events and third party advice where applicable. Where appropriate and relevant those provisions are discounted to take into consideration the time value of money.

In particular, redundancy provisions are made where the plans are sufficiently detailed and well advanced, and where appropriate communication to those affected has been made at the end of the reporting year. These provisions also include charges for any termination costs arising from enhancement of retirement or other post-employment benefits for those employees affected by these plans.

Provisions are also created for long term employee benefits that depend on the length of service, such as long service and sabbatical awards, disability benefits and long-term compensated absences such as sick leave. The amount recognised as a liability is the present value of benefit obligations at the end of the reporting period, and all movements in the provision (including actuarial gains and losses or past service costs) are recognised immediately within profit and loss.

TSN participates in the EU Emissions Trading Scheme, initially measuring any rights received or purchased at cost, and recognises a liability in relation to carbon dioxide allowances if there is any anticipated shortfall in the level of allowances received or purchased when compared with actual emissions in each period. Any surplus is only recognised once it is realised in the form of an external sale.

VII Other accounting policies

(a) Basis of consolidation

The consolidated income statement, statement of comprehensive income, balance sheet, statement of changes in equity and statement of cash flows include the Company and its subsidiaries. They also include the Group's share of the profits, net assets and retained post-acquisition reserves of joint ventures and associates that are consolidated using the equity method of consolidation.

The profits or losses of subsidiaries, joint ventures and associates acquired or sold during the period are included from the date of acquisition or up to the date of their disposal. All intra-group transactions, balances, income and expenses are eliminated on consolidation, including unrealised profits on such transactions.

For the company only financial statements TSN makes use of the exemption in DCC art. 2:402.



**(b) Revenue**

The Group’s revenue is primarily derived from the single performance obligation to transfer steel products under arrangements in which the transfer of control of the products and the fulfilment of the Group’s performance obligation occur at the same time. Revenue from the sale of goods is recognised when the Group has transferred control of the goods to the buyer and the buyer obtains the benefits from the goods, the potential cash flows and the amount of revenue (the transaction price) can be measured reliably, and it is probable that the Group will collect the consideration to which it is entitled to in exchange for the goods.

The Group manufactures and sells a range of steel products. Sales are recognised when control of the products has transferred, being when the products are delivered to the customer. Delivery occurs when the products have been shipped to the specific location, the risks of obsolescence and loss have been transferred, and either the customer has accepted the products in accordance with the sales contract, or the Group has objective evidence that all criteria for acceptance have been satisfied.

The steel is sometimes sold with volume discounts based on aggregate sales over a 12 month period. Revenue from these sales is recognised based on the price specified in the contract, net of the estimated volume discounts. Accumulated experience is used to estimate and provide for the discounts, using the expected value method, and revenue is only recognised to the extent that it is highly probable that a significant reversal will not occur. A contract liability is recognised for expected volume discounts payable to customers in relation to sales made until the end of the reporting year. No element of financing is deemed present as the sales are normally made with a credit term of 60 days, which is consistent with market practice. Any obligation to provide a refund is recognised as a provision.

A receivable is recognised when the goods are delivered as this is the point in time that the consideration is unconditional because only the passage of time is required before the payment is due.

The Group does not have any contracts where the period between the transfer of the promised goods or services to the customer and payment by the customer exceeds one year. As a consequence, the Group does not adjust any of the transaction prices for the time value of money.

**(c) Government grants**

Grants related to expenditure on property, plant and equipment are credited to profit and loss over the useful lives of qualifying assets. Grants related to revenue are credited to the income statement in line with the timing of when costs associated with the grants are incurred. Total grants received less the amounts credited to profit and loss at the end of the reporting period are included in the balance sheet as deferred income.

**(d) Insurance**

Insurance premiums in respect of insurance placed with third parties are charged to profit and loss in the year to which they relate.

**(e) Financing items**

Interest income is accrued on a time basis, by reference to the principal outstanding and at the effective interest rate applicable.

Interest expense, excluding that related to financing the construction of qualifying property, plant and equipment is expensed as incurred. Dividend income is recognised when the right to receive payment is established.

**(f) Foreign currencies**

Monetary assets and liabilities in foreign currencies are translated into Euro at the quoted rates of exchange ruling at the end of each reporting year. Income statement items and cash flows are translated into sterling at the average rates for the financial year. In order to hedge its exposure to certain foreign exchange transaction risks, the Group enters into forward contracts and options (see (g) below for details of the Group’s accounting policies in respect of such derivative financial instruments). In preparing the financial statements of the individual companies, transactions in currencies other than the entity’s functional currency are recognised at the rates of exchange prevailing on the dates of the transactions.

Exchange differences on the retranslation of the opening net investment in foreign enterprises and the retranslation of profit and loss items from average to closing rate are recorded as movements on reserves. Such cumulative exchange differences are transferred to profit and loss on subsequent disposal of the foreign enterprise and for other substantial reductions in capital in these enterprises during the period. Under IAS 21, cumulative translation differences on the consolidation of subsidiaries are only being accumulated for each individual subsidiary from the date of acquisition.

Goodwill and fair value adjustments arising on the acquisition of a foreign entity are treated as assets and liabilities of the foreign entity and translated at the closing rate.

**(g) Financial instruments**

Financial assets and financial liabilities are recognised on the Group’s balance sheet when the Group becomes a party to the contractual provisions of the instrument. Financial assets and financial liabilities are initially measured at fair value. The detailed accounting treatment for such items can differ, as described in the following sections:

**(i) Financial assets**

All regular way purchases or sales of financial assets are recognised and derecognised on a trade date basis. Regular way purchases or sales are purchases or sales of financial assets that require delivery of assets within the time frame established by regulation or convention in the marketplace.

All recognised financial assets are measured subsequently in their entirety at either amortised cost or fair value, depending on the classification of the financial assets. Where the Group transfers substantially all the risks and rewards of ownership of a financial asset, the financial asset is derecognised, and any rights and obligations created or retained in the transfer are recognised separately as assets or liabilities. This includes the Group’s €600m non-recourse debtor securitization facility.

*Classification of financial assets*

- Financial assets that meet the following conditions are measured subsequently at amortised cost:
- it is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows; and
  - the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

- Financial assets that meet the following conditions are measured subsequently at fair value through other comprehensive income (FVTOCI):
- it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling the financial assets; and
  - the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

By default, all other financial assets are measured subsequently at fair value through profit or loss (FVTPL).

Where the group purchases emission rights from an emission trading scheme, it recognises these as an asset, and values the asset at cost. No amortisation is recognised, provided that the group intends to utilise the asset to settle emission rights liabilities.

**(ii) Impairment of financial assets**

The Group recognises a loss allowance for expected credit losses on investments in debt instruments that are measured at amortised cost or at FVTOCI, lease receivables, trade receivables and contract assets. The amount of expected credit losses is updated at each reporting date to reflect changes in credit risk since initial recognition of the respective financial instrument. The Group always recognises lifetime ECL for trade receivables, contract assets and lease receivables. For all other financial instruments and in the case of the company intercompany receivables, the Group recognises lifetime ECL when there has been a significant increase in credit risk since initial recognition. However, if the credit risk on the financial instrument has not increased significantly since initial recognition, the Group measures the loss allowance for that financial instrument at an amount equal to 12-month ECL.

The measurement of expected credit losses is a function of the probability of default, loss given default (i.e. the magnitude of the loss if there is a default) and the exposure at default. The assessment of the probability of default and loss given default is based on historical data adjusted by forward-looking information.

Even when credit losses are recognised, amounts are only fully written off once all possibility of recoverability has been extinguished.

**(iii) Financial liabilities**

All financial liabilities are measured subsequently at amortised cost using the effective interest method or at FVTPL. Financial liabilities are classified as at FVTPL when the financial liability is (i) contingent consideration of an acquirer in a business combination, (ii) held for trading or (iii) it is designated as at FVTPL.

Financial liabilities at FVTPL are measured at fair value, with any gains or losses arising on changes in fair value recognised in profit or loss to the extent that they are not part of a designated hedging relationship (see Hedge accounting policy). The net gain or loss recognised in profit or loss incorporates any interest paid on the financial liability and is included in profit or loss.

Financial liabilities that are not (i) contingent consideration of an acquirer in a business combination, (ii) held-for-trading, or (iii) designated as at FVTPL, are measured subsequently at amortised cost using the effective interest method.

**(iv) Derivative financial instruments and hedge accounting**

In the ordinary course of business, the Group uses certain derivative financial instruments to reduce business risks which arise from its exposure to foreign exchange, base metal prices and interest rate fluctuations. The instruments are confined principally to forward foreign exchange contracts, forward rate agreements, interest rate swaps and London Metal Exchange (‘LME’) contracts. The instruments are employed as economic hedges of transactions included in the accounts or forecast for firm contractual commitments. Contracts do not extend beyond 6 months, except for certain interest rate swaps and commodity contracts.

Derivatives are initially accounted for and measured at fair value from the date the derivative contract is taken out. Following this, at each subsequent reporting period end the derivative is re-measured at its current fair value. For forward currency contracts, interest rate swaps and commodity contracts the fair values are determined based on market forward rates at the end of the reporting period. The Group seeks to adopt -hedge accounting for these currency, interest rate and commodity contracts. At inception of the hedge relationship, the group documents the economic relationship between hedging instruments and hedged items including whether changes in the cash flows of the hedging instruments are expected to offset changes in the cash flows of hedged items. This documentation includes, inter alia, items such as identification of the hedged item or transaction and the nature of the risk being hedged. At inception each hedge is expected to be highly effective in achieving an offset of changes in fair value or cash flows attributable to the hedged risk. The methodology of testing the effectiveness and the reliability of this approach for testing is also considered and documented at inception. This effectiveness is assessed on an ongoing basis throughout the life cycle of the hedging relationship. Only forecast transactions that are highly probable are subject to cash flow hedges. Changes in the fair value of derivative financial instruments that are designated and effective as hedges of future cash flows are recognised directly in equity and the ineffective portion is recognised immediately in profit and loss. If the cash flow hedge of a firm commitment or forecasted transaction results in the

recognition of a non-financial asset or liability, then, at the time the asset or liability is recognised, the associated gains or losses on the derivative that had previously been recognised in equity are included in the initial measurement of the asset or liability. For hedges that do not result in the recognition of a non-financial asset or a liability, amounts deferred in equity are recognised in profit and loss in the same period in which the hedged item affects profit and loss.

For an effective hedge of an exposure to changes in fair value, the hedged item is adjusted for changes attributable to the risk being hedged with the corresponding entry in profit and loss. Gains or losses from re-measuring the associated derivative are also recognised in profit and loss.

Changes in the fair value of derivative financial instruments that do not qualify for hedge accounting are recognised in profit and loss as they arise.

Hedge accounting is discontinued when the hedging instrument expires or is sold, terminated, exercised or no longer qualifies for hedge accounting. At that time, any cumulative gain or loss on the hedging instrument recognised in equity is retained in equity until the forecasted transaction occurs. If a hedged transaction is no longer expected to occur, the net cumulative gain or loss recognised in equity is reclassified to net profit or loss for the period.

**(v) Embedded derivatives**

An embedded derivative is a component of a hybrid contract that also includes a non-derivative host – with the effect that some of the cash flows of the combined instrument vary in a way similar to a stand-alone derivative.

Derivatives embedded in hybrid contracts with a financial asset host within the scope of IFRS 9 are not separated. The entire hybrid contract is classified and subsequently measured as either amortised cost or fair value as appropriate.

Derivatives embedded in hybrid contracts with hosts that are not financial assets within the scope of IFRS 9 (e.g. financial liabilities) are treated as separate derivatives when they meet the definition of a derivative, their risks and characteristics are not closely related to those of the host contracts and the host contracts are not measured at FVTPL. If the hybrid contract is a quoted financial liability, instead of separating the embedded derivative, the Group generally designates the whole hybrid contract at FVTPL.

An embedded derivative is presented as a non-current asset or non-current liability if the remaining maturity of the hybrid instrument to which the embedded derivative relates is more than 12 months and is not expected to be realised or settled within 12 months.

**(h) Other intangible assets**

Patents, trademarks and software are included in the balance sheet as intangible assets where they are clearly linked to long term economic benefits for the Group. In this case they are measured initially at fair value on acquisition or purchase cost and then amortised on a straight-line basis over their estimated useful lives. All other costs on patents, trademarks and software are expensed in profit and loss as incurred.

Expenditure on research activities is recognised as an expense in the period in which it is incurred. Costs incurred on individual development projects are recognised as intangible assets from the date that all the following conditions are met:

- (i) completion of the development is technically feasible;
- (ii) it is the intention to complete the intangible asset and use or sell it;
- (iii) it is clear that the intangible asset will generate probable future economic benefits;
- (iv) adequate technical, financial and other resources to complete the development and to use or sell the intangible asset are available; and
- (v) it is possible to reliably measure the expenditure attributable to the intangible asset during its development.

Costs are no longer recognised as an asset when the project is complete and available for its intended use, or if these criteria no longer apply. The approach to amortisation and impairment of other intangible assets is described in section VI (b) above.

Where development activities do not meet the conditions for recognition as an asset, any associated expenditure is treated as an expense in the period in which it is incurred.

Where the Group purchases emission rights from an emission trading scheme, it recognises these as a current asset, where these are intended to settle a current liability, and values the asset at cost. No amortisation is recognised, provided that the Group intends to utilise the asset to settle emission rights liabilities.

**(i) Leases**

As a lessee, the Group assesses if a contract is or contains a lease at the inception of the contract. A contract is or contains a lease if it conveys the right to control the use of an identified asset for a period in exchange for consideration.

The Group recognises a right-of-use asset and a lease liability at the commencement date, except for short-term leases of twelve months or less, leases for which the underlying asset is low value and leases of intangible assets, which are expensed in the consolidated income statement on a straight-line basis over the lease term.

The lease liability is initially measured at the present value of the lease payments that are not paid at that date, discounted using the interest rate implicit in the lease if that rate can be readily determined. If that rate cannot be readily determined, the Group uses the incremental borrowing rate. The incremental borrowing rate is calculated with reference to the businesses cost of funding, length of the lease and the suitability of the assets to leasing.

Lease payments can include fixed payments, variable payments that depend on an index or rate known at the commencement date and extension options, if the Group is reasonably certain to exercise the option. Lease liabilities are classified as part of borrowings.

The associated right-of-use asset is capitalised equal to the lease liability and disclosed together with property, plant and equipment. The right-of-use asset is subsequently depreciated on a straight-line basis over the lease term. Right-of-use assets are also subject to testing for impairment if there is an indicator for impairment.

Variable lease payments not included in the measurement of the lease liabilities are expensed in the consolidated income statement in the period in which the events or conditions which trigger those payments occur.

**(j) Joint ventures, joint operations and associates**

The results and assets and liabilities of joint ventures and associates are incorporated in the accounts using the equity method of accounting, except where classified as held for sale.

Investments in joint ventures and associates are initially measured at cost. Any excess of the cost of acquisition over the Group's share of the fair values of the identifiable net assets acquired, being goodwill, is included within the carrying value of the joint venture or associate and is subsequently tested for impairment on an annual basis. Any deficiency of the cost of acquisition below the Group's share of the fair values of the identifiable net assets acquired is credited to profit or loss in the period of acquisition. The Group's share of post-acquisition profits and losses is recognised in profit and loss, and its share of post-acquisition movement in reserves are recognised directly in reserves. Losses of associates in excess of the Group's interest in those associates are not recognised, unless the Group has incurred obligations or made payments on behalf of the associate.

Unrealised gains on transactions with joint ventures or associates are eliminated to the extent of the Group's interest in those entities and, where material, the results of joint ventures and associates are modified to conform to the Group's policies.

A joint operation is a joint arrangement whereby the parties that have joint control of the arrangement have rights to the assets and obligations for the liabilities relating to the arrangement. Joint operations are accounted for by recognising the share of assets, liabilities, expenses and income relating to the joint operation.

**(k) Non-current assets and disposal groups held for sale**

Non-current assets and disposal groups classified as held for sale are measured at the lower of their carrying amount and fair value less cost of disposal, when the sale is highly probable. Non-current assets classified as held for sale and the assets of a disposal group classified as held for sale are presented separately from the other assets in the balance sheet. The liabilities of a disposal group classified as held for sale are presented separately from other liabilities in the balance sheet.

Non-current) assets held for sale (including those that are part of a disposal group) are not depreciated or amortised while they are classified as held for sale. An impairment loss is recognised for any initial or subsequent write-down of a disposal group to fair value less cost of disposal.

**(l) Inventories**

Inventories of raw materials are valued at the lower of cost and net realisable value. Cost is generally determined using the weighted average cost method. Inventories of partly processed materials finished products and stores are individually valued at the lower of cost and net realisable value. Cost comprises direct materials and, where applicable, direct labour costs and those overheads that have been incurred in bringing the inventories to their present location and condition. Net realisable value is the price at which the inventories can be realised in the normal course of business after allowing for the cost of conversion from their existing state to a finished condition and for the cost of marketing, selling and distribution. Provisions are made to cover slow moving and obsolete items based on historical experience of utilisation on a product category basis, which involves individual businesses considering their local product lines and market conditions.

**(m) Cash and cash equivalents**

Cash and cash equivalents include cash in hand, deposits held at call with banks, other short term highly liquid investments with original maturities of three months or less, and bank overdrafts. Bank overdrafts are shown within borrowings in current liabilities on the balance sheet.

**(n) Equity**

Share capital: Ordinary shares are classified as equity.

Dividend distribution to the Company's shareholders is recognised as a liability in the Company's annual accounts in the period in which the dividends are approved by the Company's shareholders. Where dividends are paid in kind the asset transferred is measured at fair value and any difference between the fair value and the carrying value of the asset is recognised in the income statement.

**(o) Cash flow statement**

The Cash flow statement has been prepared using the indirect method. Cash flows in foreign currencies have been translated into euros using average exchange rates, approximating the foreign exchange rate at transaction date. Exchange rate differences on cash items are shown separately in the Cash flow statement.

Receipts and payments with respect to income tax and interest are included in the Cash flows from operating activities. The cost of acquisition of subsidiaries, associates and joint ventures, and other investments, as far as it was paid for in cash, is included in Cash flows from investing activities. Acquisitions or divestments of subsidiaries are presented net of cash balances acquired or disposed of, respectively. Cash flows from derivatives are recognized in the Cash flow statement in the same category as those of the hedged item.



Notes to the consolidated accounts

1. Revenue

The Group derives its revenue from contracts with customers for the transfer of goods and services over time and at a point in time in the following major geographic regions. Substantially all revenue is derived from the sale of goods. This disaggregation is consistent with the information regularly reviewed by the Board of Management in order to evaluate the financial performance of the Group.

	2025	2024
	€m	€m
Revenue by destination		
Netherlands	705	827
Europe excluding the Netherlands	4.373	3.919
North America	975	899
Rest of the world	220	298
	6.273	5.943

2. Operating costs

	Note	2025	2024
		€m	€m
Cost by nature:			
Raw materials and consumables		3.192	2.974
Maintenance costs (excluding own labor)		482	507
Other external charges (including fuels and utilities, hire charges and carriage costs)		803	960
Employment costs	4	1.186	1.214
Depreciation, amortization and impairments		296	264
Regional development and other grants released		-	(1)
Other operating items (including rents, rates, insurance and general expenses)		526	413
Changes in inventory of finished goods and work in progress		55	420
Own work capitalized		(47)	(85)
Loss/(Profit) on disposal of property, plant and equipment		(17)	(3)
		6.476	6.663

The above costs include €10m (2024: €40m) in respect of restructuring and impairment, which relate to Employment costs of €5m (2024: €22m) and depreciation and amortisation of €5m (2024: €18m). Further analysis of restructuring and impairment costs is presented in Note 3.

	2025	2024
	€m	€m
The above costs are stated after including:		
Amortization of other intangible asset (Note 8)	7	8
Impairment losses related to other intangible fixed assets (note 3)	-	3
Impairment losses related to property, plant and equipment (Note 3)	4	15
Depreciation of owned assets (Note 9)	264	220
Depreciation of leased assets (Note 9)	21	18
Low value lease costs	4	4
Variable lease costs	22	20
Costs of research and development (gross)	56	65
Recoveries on research and development	(4)	(4)
Emission rights costs	153	(9)

3. Restructuring and impairment costs

	2025	2024
	€m	€m
Provision for restructuring and related measures:		
Redundancy and related costs (Note 4)	5	22
Impairment losses related to intangible assets (Note 8)	-	3
Impairment losses related to property, plant and equipment (Note 9)	4	15
	9	40

Refer to note 37 subsequent events for further information on the announced restructuring after year-end.

4. Employees

	2025	2024
	€m	€m
The total employment costs of all employees (including directors) in the Group were:		
Wages and salaries	904	933
Social security costs	155	145
Pension costs (Note 31)	122	114
Redundancy and other related costs (Note 3 and 22)	5	22
	1.186	1.214

The average number of the Group's employees during the year was 12.217 (2024: 12.379). The analysis by business area and by country was:

	2025	2024		2025	2024
BU IJmuiden	9.577	9.640	The Netherlands	10.150	10.228
BU Downstream	2.640	2.739	France	542	554
			Germany	649	641
			Other	876	956

Other pension costs can be further analysed as follows:

	2025	2024
	€m	€m
Defined benefit schemes (Note 31)	3	3
Defined contribution schemes (Note 31)	119	111
	122	114

5. Financing items

	2025	2024
	€m	€m
Interest expense:		
Bank and other borrowings	(21)	(7)
Interest on leases	(8)	(5)
Discount on disposal of trade receivables within purchase agreement with external companies	(26)	(29)
Finance costs	(55)	(41)
Interest income:		
From Other sources	-	14
Finance income	-	14
	(55)	(27)

6. Taxation

	2025	2024
	€m	€m
Dutch current year tax charge	63	191
Dutch prior year tax charge/(credit)	(6)	6
Other current tax charge	(3)	(5)
Other prior year tax charge/(credit)	(9)	(2)
Current tax charge	45	190
Dutch deferred tax	16	1
Other deferred tax	(8)	(4)
Taxation	53	187

In addition to the total taxation (credited)/charged to the income statement, an amount of €nil is charged in other comprehensive income in the year (2024: a credit of €8m).

The total (credit)/charge for the year reconciles to the accounting profit/(loss) as follows:

	2025	2024
	€m	€m
Profit/(loss) before taxation	(257)	(743)
Profit/(Loss) before taxation multiplied by the Applicable Dutchcorporation tax rate of 25.8% (2024: 25.8%)	66	192
Effects of:		
Impact of different tax rate in foreign jurisdictions	-	(1)
Adjustments to current tax in respect of prior years	(15)	4
Adjustments to deferred tax in respect of prior years	19	-
Changes in unrecognised losses and other tax benefits	(14)	(7)
Non-taxable income	(2)	2
Other differences	(1)	(3)
Total taxation	53	187

Pillar Two legislation has been enacted or substantively enacted in certain jurisdictions in which TSN Group operates. The legislation is effective for the Group's as of 2025 financial year. The Group recognised no current tax expense (2024: € nil) in respect of top-up tax which related to the Group's operations.

The Group has applied a temporary mandatory relief from deferred tax accounting for the impacts of the top-up tax and accounts for it as a current tax when it is incurred.

7. Goodwill

	2025	2024
	€m	€m
Net book value	8	8

Goodwill acquired in a business combination is allocated, at acquisition, to the cash generating units that are expected to benefit from that combination. TSN tests goodwill annually for impairment, or more frequently if there are any indications that goodwill might be impaired.

The outcome of the Group's goodwill impairment test as at 31 March 2025 resulted in no impairment of goodwill, refer to note 9 for disclosure on impairment test (2024: no impairment).

8. Intangible assets

	Computer software	Development costs	Patents and trademarks	Total
2025	€m	€m	€m	€m
Cost at beginning of the period	163	39	1	203
Additions	4	-	-	4
Disposals	-	(21)	-	(21)
Cost at end of the period	167	18	1	186
Amortization at beginning of the period	97	39	1	137
Charge for the period	7	-	-	7
Disposals	-	(21)	-	(21)
Amortization at end of the period	104	18	1	123
Net book value at the end of the period	63	-	-	63

	Computer software	Development costs	Patents and trademarks	Total
2024	€m	€m	€m	€m
Cost at beginning of the period	151	39	1	191
Additions	5	-	-	5
Disposals	-	-	-	-
Changes in consolidation*	7	-	-	7
Cost at end of the period	163	39	1	203
Amortization at beginning of the period	81	39	1	121
Charge for the period	11	-	-	11
Changes in consolidation*	5	-	-	5
Amortization at end of the period	97	39	1	137
Net book value at the end of the period	66	-	-	66

\* Change in consolidation related to the legal merger of BSNI into TSN.



9. Property, plant and equipment

2025	Land and buildings	Plant and machinery	Assets under construction	Right-of-use assets	Total
	€m	€m	€m	€m	€m
Cost or valuation at the beginning of the period	1,207	8,152	506	200	10,065
Additions	4	73	218	54	349
Exchange rate movements	1	2	-	-	3
Reclassifications and other movements	44	30	3	(25)	52
Transfers to/(from) assets under construction	20	232	(252)	-	-
Disposals	(1)	(60)	(1)	(8)	(70)
Cost or valuation at the end of the period	1,275	8,429	474	221	10,399
Depreciation at the beginning of the period	949	6,211	4	91	7,255
Charge for the period	21	243	-	21	285
Impairment charge for the period	-	4	-	-	4
Exchange rate movements	1	1	-	-	2
Reclassifications and other movements	38	33	-	(19)	52
Disposals	(1)	(39)	-	(8)	(48)
Depreciation at the end of the period	1,008	6,453	4	85	7,550
Net book value at the end of the period	267	1,976	470	136	2,849

2024	Land and buildings	Plant and machinery	Assets under construction	Right-of-use assets	Total
	€m	€m	€m	€m	€m
Cost or valuation at the beginning of the period	1,138	7,329	730	243	9,440
Additions	6	87	489	56	638
Exchange rate movements	1	1	-	-	2
Change in consolidation* and Reclassifications	60	120	-	(26)	154
Transfers to/(from) assets under construction	10	703	(713)	-	-
Transfers to held for sale	(6)	(18)	-	-	(24)
Disposals	(2)	(70)	-	(73)	(145)
Cost or valuation at the end of the period	1,207	8,152	506	200	10,065
Depreciation at the beginning of the period	917	5,949	4	137	7,007
Charge for the period	20	200	-	18	239
Impairment charge for the period	-	15	-	-	15
Reversal of impairment losses for the period	-	-	-	-	-
Exchange rate movements	-	1	-	-	1
Change in consolidation* and Reclassifications	17	104	-	9	130
Transfers to held for sale	(4)	(15)	-	-	(19)
Disposals	(1)	(43)	-	(73)	(118)
Depreciation at the end of the period	949	6,211	4	91	7,255
Net book value at the end of the period	258	1,941	502	109	2,810

\* Change in consolidation includes €116m (cost) and € 89m (accumulated depreciation) related to the legal merger of British Steel Nederland International BV into Tata Steel Nederland BV.

Consistent with the annual test for impairment of goodwill as at 31 March 2025 (see note 7) property, plant and equipment was also tested for impairment at that date because where indicators of impairment existed. This involves the Group estimating the recoverable amounts of individual Cash Generating Units (CGU). See the Critical Judgements in Applying the Group's Accounting Policies on page 116 for further information with regards to the definition of CGU's.

European countries including the Netherlands have legal requirements to reach net zero by 2050 and whilst these requirements may not place any obligation on TSN to contribute to those goals, the increased focus and clear direction from politicians and society means that TSN may face these legal obligations at some point in time. As such, decarbonisation is central to the long-term strategy of TSN which has set out its ambitions to achieve net-zero CO<sub>2</sub> emissions for Scope 1 and 2.

In the previous year, Tata Steel Nederland submitted an improved Green Steel Plan with an enhanced focus on reducing the impact on our environment and making TSN more circular to the Dutch government. An update of the decarbonisation plans was submitted in January 2025. Irrespective of the choice of technology, TSN still aims to be producing a combined c. 7mt of steel post decarbonisation, is not currently envisioning any changes to their downstream steel making capability and aims to continue to serve the same markets by offering its customers the low carbon steel products they require. During the year discussions with the Dutch government to secure funding and policy support to enable the decarbonisation and environmental project progressed but are still ongoing. The Dutch government has completed the pre-notification filing with the European Commission regarding the project.

The technological shift required to enable the transition to low-CO<sub>2</sub> steel will require significant long-term investments that will be conditional upon national energy infrastructure, requirements for a European level playing field for the steel industry (e.g., EU Carbon Border Adjustment Mechanism), and other government legislation. TSN expects that the cost for decarbonisation are not borne by the steel industry alone, but also by society, either through higher steel selling prices or through government intervention whereby investments in decarbonisation are enabled through government assistance.

There are continued challenges from Environmental agencies on the operation of Coke and Gas Plant and related emissions. In 2024, the Environmental Agency North Sea Channel Area (“EA”) measured exceedances of emission thresholds for MVP1 (including PAH) and MVP2 at the CGP1 oven stacks and MVP1 (including PAH) and g.O2 at the CGP2 oven stacks. Further to these measurements, on 19 December 2024 the EA imposed two orders under penalties on TSIJ to end these exceedances within 8 weeks and stay below emission thresholds. Secondly, on 19 December 2024, the EA sent TSIJ a notice on alleged non-compliances at the CGP2, which concern the state of maintenance of the plant, in particular the oven walls.

Further to the above the recent macro-economic downturn in European Union for Steel Produces led by significantly high cost structure (CO<sub>2</sub> Cost and network tariff cost) and lower spread due to significant

steel imports from other geographies resulted into subdued financial performance in FY 25.

Considering presence of these internal and external indicators the management has carried out impairment testing for the Property, Plant and Equipment's for the year ended March 31, 2025.

For the purposes of TSN's 31 March 2025 year-end reporting under IFRS detailed impairment reviews were conducted for, amongst others, the most material CGU (BU IJmuiden primarily comprising of Tata Steel IJmuiden BV). The recoverable amount of CGU BU IJmuiden has been determined from a fair value less costs of disposal ('FVLCD') calculation. TSN has used the income approach valuation technique to determine Fair Value (FV). All the critical assumptions used in the present value determination reflects market participants view and reflects market assumptions. The cash flows from FY 26 to FY 50 were discounted with a terminal cash flow in FY 50.

CGU Business Unit Tata Steel IJmuiden

The recoverable amount of Business Unit IJmuiden CGU has been determined from a fair value less costs of disposal ('FV') calculation.

The FV calculation involves estimating future cash flows that TSN expects to derive from the CGU using the Annual Plan FY 26 and an expected level of EBITDA for the period FY27-FY29 and, for the period FY30 onwards, assumptions on cash flows during, and after, the transition to the DRI route of production. TSN is committed to transitioning in a phased manner out of blast furnace operations to steel making using direct reduced iron technology and electric smelting, with an eventual transition to Green Hydrogen depending on availability and economics. Updated plans for phase 1, replacing one of the blast furnaces and one of the cokes and gas plants (CGP2) with the first DRI plant and Electric Arc Furnace (EAF), and which is to be completed by 2030, were submitted to the Netherlands government in January 2025 and are part of the so called “Maatwerk” discussions. The FV calculation includes assumptions with respect to capital expenditure regarding the amounts necessary to pursue decarbonisation, as well as an assumption of government grants for Phase The cash flows are further adjusted for business improvement initiatives and for the future expected benefits on account of the capital expenditure. For the FV calculation, a set of inflation assumptions is used to extrapolate the cash flow projections beyond the three-year period up until the terminal year at which point a 2.0% (2023-24: 2%) growth rate is used on future cashflows into perpetuity. The post-tax discount rate of 8.2% (March 31, 2024: 8.2%) is derived from the Group's weighted average cost of capital (WACC) and the WACCs of its main European steel competitors. The outcome of the impairment evaluation as at March 31, 2025 for BU IJmuiden resulted in no impairment of property, plant and equipment (2023-24: Nil).

Key assumptions for the FV model are expected changes to selling prices and raw material costs, EU steel demand, energy costs including network costs at FY 25 Level, Continuation of license to operate for CGP 2 till FY 30, the timing and availability of permits required, the ability to successfully deliver the business improvement initiatives identified in the Annual Plan, the amount of capital expenditure needed for decarbonisation, the changes to EBITDA resulting from

producing and selling low carbon steel, levels of government support for decarbonisation, the commissioning of new carbon free production facilities, CBAM is effective in reducing inflow of high carbon steel into the EU market and a post-tax discount rate of 8.2%. In particular, whilst TSN has submitted its green steel transition plan to the Dutch government a formal commitment or agreement on the support from the Dutch government is under discussion. The Group believes the key assumptions made represent the most likely impact from decarbonisation at this point in time. These key assumptions will be kept under review in future years especially if investments in decarbonisation capital expenditure become committed. These key assumptions will also remain part of the active dialogue with the Dutch government.

The recoverable amount for Tata Steel IJmuiden, after considering various downside scenarios, is at € 3,390 million against a carrying value of assets of € 2,866 million. The recoverable value has been determined and stress tested after appropriately considering the major downside impact of probable risks which the business may get exposed to. It is the best view of the directors that government support would be provided on a similar level to recent commitments seen by other national governments within Europe. However, if the support from the Dutch government would not be as expected, then there would be a material impact on the valuation of property, plant and equipment. This could also have a significant impact on how the current decarbonisation plans could be realised. In addition, the Group has conducted several sensitivity analysis on the impairment test of the carrying value of the BU IJmuiden CGU

1. an increase in discount rate by 1% will lead to a reduction in recoverable value by € 1.047 million, as a result there will be an impairment of € 523 million;
2. a decrease in discount rate by 1% will lead to an increase in recoverable value by € 1.520 million, as a result the revised surplus will be € 2,044 million;
3. Terminal growth reduced by 1% will lead to a reduction in recoverable value by € 312 million, as a result the revised surplus will be € 212 million;
4. early closure of both CGP plants (CGP1 and CGP 2), the license to operate gets revoked from start of FY27 onwards, will lead to a reduction in recoverable value by € 373 million, as a result the revised surplus will be € 151 million;
5. there will be no impact of EA notices on the operation of CGP Plants, which will lead to an increase in recoverable value by € 562 million, as a result the revised surplus will be € 1.086 million;
6. CBAM effectiveness lower by 1% will lead to a reduction in recoverable value by € 170 million as a result the revised surplus will be € 354 million;
7. reduction in terminal value EBITDA/Revenue by 0.2% will lead to a reduction in recoverable value by € 54 million, as a result the revised surplus will be € 470 million; and
8. an increase in structured improvement program on by 10% on a year on year basis will lead to an increase in recoverable value by € 446 million, as a result the revised surplus will be € 970 million.

## Other CGU's

For other CGU's, a value in use (VIU) calculation has been prepared to consider the recoverable amount and assess whether this exceeds the carrying value. This VIU calculation uses cash flow forecasts based on the most recently approved financial budgets and strategic forecasts which cover a period of three years and future projections taking the analysis out to perpetuity based on a steady state, sustainable cash flow reflecting average steel industry conditions between successive peaks and troughs of profitability. Key assumptions for the value in use calculation are those regarding expected changes to selling prices and raw material costs, EU steel demand, energy costs, exchange rates, and a pre-tax discount rate of 11.0% (2023-24: 11.0%). Changes in selling prices, raw material costs, exchange rates and EU steel demand are based on expectations of future changes in the steel market based on external market sources.

In preparing the value in use calculation TSN has considered the effect that climate related risks may have on its future cash flow generation. Included within the cash flow forecasts are estimates for costs of compliance under the EU Emissions Trading Scheme based on the Group's estimated shortfall between free allowances under the scheme and actual emissions.

The outcome of this test indicated that, using a pre-tax discount rate of 11.0% (2023-24: 11.0%), none of the CGUs in the TSN group had a recoverable amount which was lower than its carrying value.

The Group has conducted sensitivity analyses on the impairment tests of the carrying value of the Group's CGUs and property, plant and equipment. The Board of Management, believe that no reasonable possible change in any of the key assumptions used in the value in use calculations would cause the carrying value of property, plant and equipment in any CGU to materially exceed its value in use.

## 10. Equity accounted investments

### As at 31 March

	Interest in joint ventures	Investments in associates	2025 Total	2024 Total
	€m	€m	€m	€m
Cost at beginning of the period	8	9	17	16
Change in consolidation*	-	-	-	1
Change in classification	2	-	2	-
Cost at end of the period	10	9	19	17
Share of post-acquisition reserves at the beginning of period	18	12	30	26
Share of results in period retained	1	-	1	5
Change in classification	(2)	-	(2)	5
Dividends	-	(2)	(2)	(1)
Share of post-acquisition reserves at end of the period	17	10	27	30
Net book value at end of the period	27	19	46	47
Net book value at beginning of the period	26	21	47	42

\* Change in consolidation related to the Tata Steel Ticaret AS, and part of the legal merger of British Steel Nederland International BV into Tata Steel Nederland BV in prior year.

The Group's equity accounted investments are listed in Note 34.

(i) Summarised information in respect of the Group's joint ventures is presented below:

### As at 31 March

	2025	2024
	€m	€m
The share of assets and liabilities of the Group's joint ventures is as follows:		
Non-current assets	13	10
Current assets	20	28
Current liabilities	(6)	(10)
Non-current liabilities	-	-
Group's share of net assets	27	28
The share of revenue and expenses of the Group's joint ventures are as follows:		
Revenue	54	71
Expenses	(55)	(69)
Group's share of joint ventures' profit/(loss) for the period	(1)	2
Dividend received	-	-
Group's share of retained profit/(loss) for the period	(1)	2



(ii) Summarised information in respect of Group's associates is presented below:

As at 31 March	2025	2024
	€m	€m
Summarised balance sheet information		
Total assets	93	91
Total liabilities	(33)	(29)
Net assets	60	62
Group's share of net assets	19	19
Summarised income statement information		
Revenue	299	289
Profit/(loss) for the period	5	5
Group's share of associates profit/(loss) for the period	-	2
Dividend received	(2)	-
Group's share of retained profit/(loss) for the period	(2)	2

(iii) The share of post-tax profits of joint ventures and associates as disclosed in the income statement arose as follows:

	2025	2024
	€m	€m
Group's share of joint ventures' profit/(loss) for the period	(1)	2
Group's share of associates profit/(loss) for the period	2	2
Total profit/(loss) on joint ventures and associates for the year	1	4

11. Other investments	Other investments	2025 Total	2024 Total
	€m	€m	€m
Carrying value at beginning and end of period	2	2	2

None of the loand and receivables or investments are either overdue or impaired

12. Other non-current assets

As at 31 March	2025	2024
	€m	€m
Other receivables	2	2

13. Inventories

As at 31 March	2025	2024
	€m	€m
Raw materials and consumables	492	644
Work in progress	417	465
Finished goods and goods for resale	508	512
	1.417	1.621

The value of inventories above is stated after impairment of €83m (2024: €72m) for obsolescence and write-downs to net realisable value. Work in progress includes semi-finished and partly processed materials.

14. Current tax

2025	Assets	Liabilities
	€m	€m
Intercompany corporate income tax receivable - Non Current	154	-
Other corporation tax – Current	5	(9)
	159	(9)

2024	Assets	Liabilities
	€m	€m
Dutch corporation tax – Current	231	(134)
Other corporation tax – Current	2	(2)
	233	(136)

As at 31 March 2025 the Dutch intercompany corporation tax balances contain a €154m net receivable from TSNH (2024: net receivable of €97m). During the financial year, the tax receivable from TSNH related to the years 2022 and 2023 is settled against part of the 2024 receivable from TSNH.

15. Trade and other receivables

As at 31 March	2025	2024
	€m	€m
Trade receivables	173	296
Less provision for expected credit losses	(3)	(4)
	170	292
Amounts owed by other Tata Steel companies (Note 33)	66	21
Amounts owed by joint ventures (Note 33)	8	10
Amounts owed by associates (Note 33)	14	15
Derivative instruments (Note 21)	9	7
Other taxation	14	24
Prepayments	9	18
Other receivables	42	39
	332	426

(i) Trade receivables are further analysed as follows:

As at 31 March 2025	Gross amount	Subject to credit insurance cover	Impairment provision	Net credit risk
	€m	€m	€m	€m
Amounts not yet due	161	(150)	-	11
One month overdue	6	(6)	-	-
Two months overdue	2	(2)	-	-
Three months overdue	-	-	-	-
Greater than three months overdue	4	(1)	(3)	-
	173	(159)	(3)	11

As at 31 March 2024	Gross amount	Subject to credit insurance cover	Impairment provision	Net credit risk
	€m	€m	€m	€m
Amounts not yet due	264	(229)	-	35
One month overdue	20	(19)	-	1
Two months overdue	4	(3)	-	1
Three months overdue	1	(1)	-	-
Greater than three months overdue	7	(3)	(4)	-
	296	(255)	(4)	37

The company has access to a trade receivables securitization arrangement, with a maximum amount of € 600 million on a non-recourse basis. At end of the financial year 2024/2025 € 524 million of this facility was utilized (prior year: € 463 million).

The Group considers its maximum exposure to credit risk with respect to third party customers at 31 March 2025 to be €11m (2024: €37m), which is the fair value of trade receivables (after impairment provisions) less those that are subject to credit insurance cover as shown in the table above. The other classes of financial assets within trade and other receivables do not contain impaired assets. There is no concentration of credit risk with any particular third-party customer.

Credit risk management is discussed further in Note 21(d).

(ii) Movements in the provision for impairment of receivables are as follows:

	2025	2024
	€m	€m
At beginning of the period	4	4
Impairments in the period (Note 2)	-	-
Amounts utilised, exchange rate translation and other movements	(1)	-
At end of the period	3	4

(iii) Amounts owed by other Tata Steel companies include trade receivables of €49m (2024: €15m) owed by TSUK and €17m (2024: €6m) owed by other Tata Steel companies.

16. Cash and short-term deposits

As at 31 March	2025	2024
	€m	€m
Cash at bank and in hand	428	104
Short-term deposits	-	-
Cash and short-term deposits	428	104

The currency and interest exposure of cash and short-term deposits of the Group is as follows:

As at 31 March	2025			2024		
	Cash	Short-term deposits	Total	Cash	Short-term deposits	Total
	€m	€m	€m	€m	€m	€m
Sterling	51	-	51	16	-	16
Euros	328	14	342	29	-	29
US Dollars	19	-	19	32	-	32
Other	16	-	16	27	-	27
	414	14	428	104	-	104

Short-term deposits are highly liquid investments with original maturities of three months or less. No deposits were outstanding as per 31 March 2025.

17. Assets classified as held for sale

The major classes of assets comprising the operations classified as held for sale are as follows:

	2025	2024
	€m	€m
Property, plant and equipment	-	5
Total assets classified as held for sale	-	5

On 25 January 2024, the Group announced it is terminating the activities of Tata Steel Istanbul Metal Sanayi ve Ticaret AS (TSIM) in Turkey. Accordingly, as at 31 March 2024, the TSIM Property, Plant and Equipment was classified as held for sale.

18. Trade and other payables

As at 31 March	2025	2024
	€m	€m
Trade payables	690	618
Amounts owed to Tata Steel companies for the purchase of raw materials	269	286
Amounts owed to other Tata Steel companies	11	64
Amounts owed to associates	3	3
Amounts owed to joint ventures	-	-
Other taxation and social security	67	67
Capital expenditure creditors	96	141
Interest payable	4	-
Derivative financial instruments (Note 21)	18	8
Derivative financial instruments owed to group companies (Note 21 + Note 33)	1	-
Employment costs provisions	297	325
Other payables	20	17
	1.476	1.529

Employment costs provisions include amounts provided in respect of holiday pay and other employment costs. Other payables include amounts for insurances and sundry other items.



## 19. Borrowings

	2025	2024
	€m	€m
Current:		
Bank and other loans	4	91
Loans from other Tata Steel companies	22	23
Lease liabilities	19	16
<b>Total current borrowings</b>	<b>45</b>	<b>130</b>
	2025	2024
	€m	€m
Non-current:		
Bank and other loans	328	22
Lease liabilities	118	91
<b>Total non-current borrowings</b>	<b>446</b>	<b>113</b>

(i) The currency and interest rate exposure of gross borrowings of the Group at the end of the period is as follows:

	2025				2024*			
	Fixed rate borrowings	Floating rate borrowings	Zero rate borrowings	Total	Fixed rate borrowings	Floating rate borrowings	Zero rate borrowings	Total
	€m	€m	€m	€m	€m	€m	€m	€m
Euros	153	332	-	485	132	107	-	239
USD	2	-	-	2	1	-	-	1
Other	4	-	-	4	3	-	-	3
<b>Total</b>	<b>159</b>	<b>332</b>	<b>-</b>	<b>491</b>	<b>136</b>	<b>107</b>	<b>-</b>	<b>243</b>

	2025		2024*	
	Weighted average fixed interest rate %	Weighted average time for which rate is fixed Years	Weighted average fixed interest rate %	Weighted average time for which rate is fixed Years
Euros	7.3	6.4	7.9	6.5

\* The prior year disclosure is adjusted for the correct split between fixed rate borrowings and floating rate borrowings.

The weighted average interest rate on short-term borrowings from other Tata Steel companies was 5.3% (2024: nil%).

(ii) The maturity of borrowings is as follows:

	2025	2024
	€m	€m
In one year or less or on demand	53	138
Between one and two years	33	32
Between two and three years	337	20
Between three and four years	26	18
Between four and five years	19	17
More than five years	75	69
	543	294
Less: amounts representing interest in future minimum lease payments	(52)	(51)
	491	243
Analysed as:		
Current liabilities	45	130
Non-current liabilities	446	113

(iii) Amounts payable under leases are as follows:

	Minimum lease payments		Present value of minimum lease payment	
	2025	2024	2025	2024
	€m	€m	€m	€m
Not later than one year	28	24	19	16
Later than one year but not more than five years	92	73	67	50
More than five years	69	62	50	42
	189	159	137	108
Less: future finance charges on leases	(52)	(51)	-	-
<b>Present value of lease liabilities</b>	<b>137</b>	<b>108</b>	<b>137</b>	<b>108</b>

The lease portfolio of the Group consists of leases of land, building, machinery, and vehicles.

(iv) The maturity of undrawn committed borrowing facilities of the Group is as follows:

	2025	2024
	€m	€m
Not later than one year	-	125
Later than one year but not more than five years	240	-
	240	125

TSN has exclusive access to a revolving credit facility of €550m (31 March 2024: €200m). Each advance would bear interest equal to EURIBOR + 1.50% per annum. As of 31 March 2025, €240m was undrawn (31 March 2024: €125m facility undrawn).

(v) Furthermore, the Group has uncommitted short-term bank facilities in various countries (the Netherlands, France, Germany, Belgium, and Switzerland) mostly within the framework of daily treasury operations such as cash pooling but also to have guaranteed facilities available related to commercial transactions.

## 20. Other non-current liabilities

As at 31 March	2025	2024
	€m	€m
Other taxation and social security	31	47
Derivative liabilities	17	-
Other creditors	-	1
	48	48

Other taxation and social security relate to deferred payroll taxes and are due for repayment within three years. These payroll tax deferrals were granted in response to the COVID 19 pandemic.

21. Financial instruments and risk management

Capital risk management

The Group manages its capital with the aim of ensuring that the entities in the Group are able to continue as a going concern. Further details are included in the basis of preparation on page 115. The Group's overall risk strategy remains unchanged from 2024. The capital structure of the Group consists of net debt, which includes the borrowings disclosed in Note 19, after deducting cash and cash equivalents (refer to note 16).

(i) Financial assets and financial liabilities recognised in the balance sheet

The carrying amounts of the Group's financial assets and financial liabilities (excluding derivative assets and liabilities) are:

	2025	2024
	€m	€m
<b>Financial assets</b>		
Trade and other receivables (Note 15) <sup>1</sup>	299	377
Cash and short-term deposits (Note 16)	428	104
Other non-current assets (Note 12)	2	2
	729	483
<b>Financial liabilities</b>		
Financial liabilities at amortised cost:		
Trade and other payables (Note 18) <sup>2</sup>	(1.390)	(1.454)
Current borrowings (Note 19)	(45)	(130)
Non-current borrowings (Note 19)	(446)	(113)
	(1.881)	(1.697)
	(1.152)	(1.214)
<sup>1</sup> Excludes derivatives, other taxation and prepayments		
<sup>2</sup> Excludes derivatives, other taxation and social security, and advances from customers		

The carrying amounts of financial assets and financial liabilities recorded at amortised cost in the financial statements approximate their fair values with the exception of current and non-current borrowings. The fair value of these are €44m (2024: €128m) and €438m (2024: €111m) respectively. The fair value of borrowings would be classified as Level 3 within the fair value hierarchy. The fair value is based on discounted cash flows and reflects the credit risk of counterparties.

(ii) Fair value measurements recognised in the balance sheet

The following table categorises the Group's financial instruments held at fair value by the valuation methodology applied in determining this value. Where possible, quoted prices in active markets for identical assets and liabilities are used (Level 1 and this includes the Group's holdings of listed investments). Where such prices are not available, the asset or liability is classified as Level 2, provided all significant inputs to the valuation model used are based on observable market data (this includes the Group's forward currency and commodity contracts). The Group's derivative financial assets and liabilities are also categorised as Level 2 and their valuation is based on future cash flows (estimated from observable data such as forward exchange rates and yield curves) which are, where material, discounted at a rate which reflects the credit risk of counterparties. If one or more of the significant inputs to the valuation model is not based on observable market data, the instrument is classified as Level 3.

2025	Level 1	Level 2	Level 3	Total
	€m	€m	€m	€m
Financial assets at fair value through other comprehensive income:				
Commodity contracts	-	8	-	8
Forward foreign currency contracts	-	1	-	1
	-	9	-	9
Financial liabilities at fair value through other comprehensive income:				
Commodity contracts	-	(29)	-	(29)
Forward foreign currency contracts	-	(8)	-	(8)
	-	(37)	-	(37)

2024	Level 1	Level 2	Level 3	Total
	€m	€m	€m	€m
Financial assets at fair value through other comprehensive income:				
Commodity contracts	-	3	-	3
Forward foreign currency contracts	-	4	-	4
	-	7	-	7
Financial liabilities at fair value through other comprehensive income:				
Commodity contracts	-	(7)	-	(7)
Forward foreign currency contracts	-	(1)	-	(1)
	-	(8)	-	(8)

There were no transfers between any of the levels during the periods represented above.

(iii) Financial risk management and financial instruments  
The Group uses a variety of financial instruments, including derivatives, to finance its operations and to manage risks arising from those operations. The principal financial risks to which the Group is exposed are those of foreign exchange, commodity, and liquidity which are largely managed by the treasury function, whose activities are governed by policies and procedures approved by the TSN Board. The businesses treasury committees meet at least quarterly to review activities and to monitor treasury performance against policies.

**(a) Market risk: Foreign exchange risk and management**  
It is the Group's policy that substantially all the net currency transaction exposure arising from contracted sales and purchases over an approximate 6 month time horizon is hedged by selling or purchasing foreign currency forwards. At 31 March 2025, the notional amounts of outstanding contracts to purchase foreign currencies was €414m (2024: €543m), mainly related to purchase of raw materials predominantly being denominated in US Dollar, with a net fair value asset of €5m (2024: €8m asset).

As at 31 March 2025, a 10% appreciation of the Euro against the US dollar would decrease the net assets of TSN by approximately €2m (2024: €3m), decrease equity by approximately €2m (2024: €3m) and have no impact on the operating profit (2024: no impact). The sensitivity analysis has been based on the composition of the dollar denominated financial assets and liabilities of the Group at 31 March, excluding trade payables, trade receivables, other non-derivative financial instruments not in debt, and financial lease obligations, all of which do not present a material exposure.

As at 31 March 2025, a 10% appreciation of the Euro against the Sterling would decrease the net assets of TSN by approximately €5m (2024: €1m), decrease equity by approximately €5m (2024: €1m) and have no impact on the operating profit (2024: no impact).

The net positions of the Euro versus other currencies are of less importance and the sensitivity of a 10% weakening/strengthening of the Euro is therefore not significant.

**(b) Market risk: Commodity risk and management**  
The Group makes use of commodity futures contracts to manage its purchase price risk for certain commodities. Forward purchases are made for iron ore, zinc, tin and nickel to cover sales contracts with fixed metal prices and for carbon emission rights based on predicted



future emission deficit. At 31 March 2025, the Group had commodity contracts with a total notional value of €520m (2024: €93m) and a net fair value liability of €20m (2024: €5m asset). The increase is related to an increased purchase of carbon emission rights compared to prior year (2025: €300m, 2024: €36m) and forward contracts for the purchase of iron ore (2025: €144m, 2024: nil).

As at 31 March 2025, a 10% decrease of the market prices of iron ore, zinc, tin, nickel and carbon emission rights would decrease the equity of TSN by approximately €37m (2024: €7m). There was no significant market risk relating to the income statement since the majority of commodity derivatives are treated as cash flow hedges with movements being reflected in equity and the timing and recognition in the income statement depending on the point at which the underlying hedged transactions are also recognised.

(c) Market risk: Interest rate risk and management

The financial structure of the Group includes only a small percentage of net assets that have been financed by loans. During 2025 and 2024, most of the Group's borrowings were denominated in Euros. The Group did not enter into interest rate swap contracts or forward rate agreements. For further details of the borrowings, such as maturity and interest rates, see Note 19.

As at 31 March 2025, the Group had fixed rate borrowings of €159m (2024: €211m), floating rate borrowings €332m (2024: €32m) and no zero rate borrowings (2024: nil).

Based on the composition of net debt at 31 March 2025, a 100 basis points increase in interest rates over the 12-month period would decrease the Group's net finance expense by approximately €3m (2024: €1m) and increase equity by approximately €3m (2024: €1m).

(d) Credit risk

Cash deposits, trade receivables and other financial instruments give rise to credit risk for the Group arising from the amounts and obligations due from counterparties. The credit risk on short-term deposits is managed by limiting the aggregate amounts and duration of exposure to any one counter party, depending on its credit rating and other credit information, and by regular reviews of these ratings. The possibility of material loss arising in the event of non-performance is considered unlikely.

Individual operating units are responsible for controlling their own credit risk arising from the Group's normal commercial operations, although they must act within a series of centrally agreed guidelines. Trade receivables are, where appropriate, subject to a credit insurance program, and regular reviews are undertaken of exposure to key customers and those where known risks have arisen or persist. Any impairment to the recoverability of debtors is reflected in the income statement.

Credit risk also arises from the possible failure of counter-parties to meet their obligations under currency and commodity hedging instruments. However, counter parties are established banks and financial institutions with high credit ratings and the Group continually monitors each institution's credit quality and limits as a matter of policy the amount of credit exposure to any one of them. The Group's theoretical risk is the cost of replacement at current market prices of these transactions in the event of default by counter-parties. The Group believes that the risk of incurring such losses is remote and underlying principal amounts are not at risk.

(e) Liquidity risk

Liquidity risk is defined as the risk that the Group could not be able to settle or meet its financial liabilities on time and at a reasonable price. The Treasury department is responsible for liquidity and funding and manages the liquidity risk by maintaining sufficient cash resources and by maintaining the availability of funding through available committed and uncommitted credit facilities, for further information on the credit lines see Note 19. The management of the liquidity risk is based on the calculation of the future net liquidity which results from the expected cash outflows and inflows.

The following table is a maturity analysis of the anticipated contractual cash flows including interest payable for the Group's derivative and non-derivative financial liabilities on an undiscounted basis, which therefore differs from both the carrying value and fair value. Floating rate interest is estimated using the prevailing interest rate at the end of the reporting period. Cash flows in foreign currencies are translated using the period end spot rates at 31 March 2025.

Liquidity risk

Maturity of contractual undiscounted cash flows At 31 March 2025	Contractual cash flows	In one year or less or on demand	Between one and five years	More than five years
	€m	€m	€m	€m
Non-derivative financial liabilities				
Trade and other payables 1	(1.390)	(1.390)	-	-
Borrowings				
Repayment	(491)	(45)	(391)	(55)
Fixed interest	(52)	(8)	(25)	(19)
	(1.933)	(1.443)	(416)	(74)
Derivative financial assets/liabilities				
Foreign currency contracts				
Payables	(416)	(416)	-	-
Receivables	410	410	-	-
Derivatives commodities: net settlement	(20)	(20)	-	-
	(26)	(26)	-	-
Total	(1.959)	(1.469)	(416)	(74)

1 Excludes derivatives, other taxation and social security and advances from customers

Maturity of contractual undiscounted cash flows At 31 March 2024	Contractual cash flows	In one year or less or on demand	Between one and five years	More than five years
	€m	€m	€m	€m
Non-derivative financial liabilities				
Trade and other payables 1	(1.454)	(1.454)	-	-
Borrowings				
Repayment	(234)	(120)	(68)	(46)
Fixed interest	(51)	(8)	(20)	(23)
	(1.739)	(1.582)	(88)	(69)
Derivative financial assets/liabilities				
Foreign currency contracts				
Payables	(538)	(538)	-	-
Receivables	546	546	-	-
Derivatives commodities: net settlement	(5)	(5)	-	-
	3	3	-	-
Total	(1.736)	(1.579)	(88)	(69)

1 Excludes derivatives, other taxation and social security and advances from customers

(iv) Derivative financial instruments

Derivative financial instruments used by the Group include forward exchange contracts and commodity contracts. These financial instruments are utilised to hedge significant future transactions and cash flows, and, in most cases, these are subject to hedge accounting under IFRS 9. The Group does not hold or issue derivative financial instruments for trading purposes. All transactions in derivative financial instruments are undertaken to manage risks arising from underlying business activities.

The following table sets out the fair values of derivatives held by the Group at the end of the reporting period:

	2025		2024	
	Assets	Liabilities	Assets	Liabilities
	€m	€m	€m	€m
Current:				
Commodity contracts	8	(29)	3	(7)
Forward foreign currency contracts	1	(8)	4	(1)
	9	(37)	7	(8)

The fair value of derivative financial instruments that were designated as cash flow hedges at the balance sheet date was:

	Forward foreign currency contracts	Commodity contracts	Taxation	2025
	€m	€m	€m	€m
Cash flow hedge reserve net of taxation at beginning of period	7	(4)	(1)	2
Fair value recognised	(20)	13	1	(6)
Cash flow hedge reserve net of taxation at end of period	(13)	9	-	(4)

Amounts recognised in the cash flow hedge reserve, excluding deferred tax, are expected to affect profit or loss within one year.

At the balance sheet date the notional amount of outstanding foreign currency and commodity contracts that the Group has committed to is as follows:

	2025	2024
	€m	€m
Commodity contracts	520	93
Forward foreign currency contracts	414	543

The commodity contracts mainly cover future carbon emission rights of which €102m will be delivered within twelve months and €197m within two years. The average forward price of the contracts is €73. The iron ore contracts have a settlement date within the next twelve months and an average forward price of €94.

The forward currency contracts have a settlement date in financial year 2026.

There was no ineffectiveness on cash flow hedges recognised in the income statement in 2025 (2024:nil).

22. Provisions for liabilities and charges

	Rationalisation Costs (i)	Environmental Provisions (ii)	Guarantee commitments (iii)	Employee Benefits (iv)	Other (v)	2025 Total	2024
	€m	€m	€m	€m	€m	€m	€m
At beginning of the period	22	28	6	97	28	181	261
Charged to income statement	9	145	2	2	2	160	40
Released to income statement	(4)	-	(1)	(9)	(6)	(20)	(27)
Utilized during the period	(14)	-	-	-	(2)	(16)	(93)
At end of the period	13	173	7	90	22	305	181
Analysed as:							
Current liabilities	12	153	1	5	2	173	35
Non-current liabilities	1	20	6	85	20	132	146

(i) Rationalisation costs include redundancy provisions as follows:

	2025	2024
	€m	€m
At the beginning of the period	22	3
Charged to income statement (Note 4)	9	22
Released to income statement (Note 4)	(4)	
Utilised during period	(14)	(3)
At end of the period	13	22

(ii) The environmental provisions consist of provisions for CO<sub>2</sub> emission rights, together with remediation and clean-up activities that are likely to be undertaken in the foreseeable future and of which the costs can reasonably be estimated. The provision for CO<sub>2</sub> emission rights is sensitive to movements in the market price for these rights. The Group makes use of forward contracts for the purchase of CO<sub>2</sub> emission rights (refer to note 21 for further information on risk management).

(iii) Guarantee commitments relate to the anticipated cost of any warranties offered to customers.

(iv) Provisions for employee benefits include long-term benefits such as long service and sabbatical leave, disability benefits and sick leave. All items are subject to independent actuarial assessments. The actuarial calculations are being subject to various assumptions, such as inflation rate, general salary increase, discount rate and mortality rates.

23. Deferred tax

The following is the analysis of the deferred tax balances for balance sheet purposes:

	2025	2024
	€m	€m
Deferred tax assets	87	78
Deferred tax liabilities	(3)	(3)



The following are the major deferred tax assets and liabilities recognised by the Group, and the movements thereon, during the current and prior period.

	Accelerated tax depreciation	Pension	Inventory	Provisions	Losses	Other	Total
2025	€m	€m	€m	€m	€m	€m	€m
At beginning of period	30	7	5	9	16	8	75
Credited/(charged) to income statement		-	-	13	(6)	2	9
(Charged)/credited to other comprehensive income	-	-	-	-	-	-	-
At end of period	30	7	5	22	10	10	84

	Accelerated tax depreciation	Pension	Inventory	Provisions	Losses	Other	Total
2024	€m	€m	€m	€m	€m	€m	€m
At beginning of period	26	8	11	4	19	15	83
Credited/(charged) to income statement	2	(1)	(6)	5	(3)	-	(3)
(Charged)/credited to other comprehensive income	-	-	-	-	-	(7)	(7)
Acquisitions	2	-	-	-	-	-	2
At end of period	30	7	5	9	16	8	75

Net deferred tax assets of €84m (2024: €75m) have been recognised at 31 March 2025. In evaluating whether it is probable that taxable profits will be earned in future accounting periods, all available evidence was considered, including TSN Supervisory Board approved budgets and forecasts. Following this evaluation, it was determined there would be sufficient taxable income generated to realise the benefit of the deferred tax assets. Deferred tax assets have not been recognised in respect of total tax losses of €325m (2024: €273m) which have no expiry date.

Of the deferred tax asset of €84m as at 31 March 2025 (2024: €75m), €2m is expected to be utilised within the next 12 months (2024: €5m).

24. Deferred income

	2025	2024
	Grants relating to property, plant and equipment	Grants relating to property, plant and equipment
	€m	€m
At beginning of the period	2	1
Additions	-	2
Released to income statement (Note 2)	-	(1)
At end of the period	2	2

25. Called-up share capital

For more detailed information on called-up share capital, see Parent Company Accounts, Note 12.

26. Future capital expenditure

	2025	2024
	€m	€m
Contracted but not provided for	111	128
Authorised but contracts not yet placed – Tangible assets	127	177
Authorised but contracts not yet placed – Intangible assets	10	14

27. Exposure for cash outflows relating to leases

	2025	2024
	€m	€m
Future exposure for cash outflows to the Group at the end of the period are:		
Future cash outflows relating to leases committed but not yet commenced	2	23
	2	23

28. Contingent liabilities

The Group is subject to several administrative measures, regulatory and criminal investigations and (threatened) civil action, and is engaged in several administrative proceedings against regulatory authorities.

In 2024, the EA for the North Sea Canal Area measured exceedances of emission thresholds for MVP1, MVP2 and g.O2 substances at the CGP1 and CGP2 oven stacks. Further to these measurements, on 19 December 2024, the EA imposed two penalty orders with a maximum amount of €27 million on TSIJ for alleged noncompliance, requiring it to stop the exceedances and stay below emission thresholds. TSIJ does not agree with the measurement protocols applied by the EA to measure MVP1, MVP2 and g.O<sub>2</sub> emissions and has filed objections against these decisions. The Hearing and Advice Committee (HAC) heard the case in March 2025. A decision on the objections is expected before the summer.

On 19 December 2024, the EA sent TSIJ a notice regarding alleged non-compliance at CGP2 concerning the state of maintenance of the plant, and in particular the oven walls. TSIJ has 12 months to remedy the alleged non-compliance. The EA indicated that should the noncompliance not be remedied in time, it will consider revoking the permit for CGP2. TSIJ has submitted its objections, and the case was presented before the HAC in April 2025. A decision on the objections is expected before the summer.

In September 2022, the EA put a penalty order on the so-called green pushes – pushing coke from the oven before the coking process is fully complete – at the CGPs in IJmuiden. TSIJ submitted its objections since it is the company’s view that, despite taking all possible measures, it is impossible to fully prevent green pushes. TSIJ also requested a permit for the green pushes, which was denied. The court hearing took place in December 2024 and the judgement was given in April 2025, whereby TSIJ’s requests were denied. TSIJ appealed against the judgement. TSIJ did not receive any collection orders for green pushes that took place in 2024.

Within a period of two years from the commencement of the Environment and Planning Act (1 January 2024) the competent authority has to make an adjustment to the environmental permit with regard to financial security. The form and content of the financial security is under discussion with the competent authority.

In a protracted infringement case initiated by a competitor of TSIJ, a court in Germany decided on 9 May 2023 that TSIJ had infringed on a valid German utility model as of July 2015 by selling a specific low-waviness steel grade, which may lead to a financial claim. TSIJ no longer produces or sells this specific steel grade and has appealed the court’s decision that TSIJ infringed the German utility model. The appeal court took an interim decision in March 2025, whereby it ordered that expert evidence shall be taken by appointing a neutral court expert. The expert is not yet appointed.

TSIJ is subject to an investigation by the Public Prosecution Office into the alleged introduction of hazardous substances that could affect public health into the soil, air or surface water. The investigation, led by the Functional Public Prosecutor’s Office, is ongoing.

Foundation Frisse Wind.nl (FW), which sent a claim notice to TSIJ in 2023, has engaged the law firm Finch. On behalf of FW, Finch holds TSN and TSIJ liable for damage allegedly suffered by local residents. Finch has announced that it intends to start a procedure under the Dutch act on collective damages claims (WAMCA). To date, no formal claim has been received.

The timing and outcome of the above mentioned contingent liabilities are uncertain and cannot be predicted at this time, and the potential outflow of resources, if any, cannot be estimated reliably. A negative outcome could potentially have a materially adverse impact on our operations, results or financial position.

29. Reconciliation of net cash flow to movement in net funds

	2025	2024
	€m	€m
Movement in cash and short-term deposits	333	(754)
Movement in debt	(204)	(33)
Change in net debt resulting from cash flows in period	129	(787)
Effect of other non-cash movements	(52)	(58)
Movement in net debt in period	77	(845)
Net funds at beginning of period	(140)	705
Net funds at end of period	(63)	(140)

30. Analysis of changes in net funds

	1 April 2024	Cash Flow	Other non-cash movements	31 March 2025
	€m	€m	€m	€m
Cash at bank and short-term deposits	104	324	-	428
Bank overdrafts	(9)	9		-
Cash and cash equivalents	95	333	-	428
Borrowings	(127)	(228)	-	(355)
Lease liabilities	(108)	24	(52)	(136)
Total debt excluding bank overdrafts	(235)	(204)	(52)	(491)
Total net funds	(140)	129	(52)	(63)

Other non-cash movements include lease liability additions in 2025 of €52m (2024: €56m).

31. Pensions and post-retirement benefits

Defined contribution schemes

TSN participates in a number of defined contribution plans on behalf of personnel. Any expense recognised in relation to these schemes represents the value of contributions payable during the period by TSN at rates specified by the rules of those plans. The only amounts included in the balance sheet are those relating to the prior month's contributions that were not due to be paid until after the end of the reporting period. The total cost charged to the income statement in 2025 amounted to €119m (2024: €114m). Of the total cost of €119m, €111m (2024: €104m) related to payments to the Stichting Pensioenfonds Hoogovens ('SPH') pension scheme.

Defined benefit schemes

TSN operates a number of defined benefit pension and post-retirement schemes. There are multiple plans, the most significant of which are in Germany and the USA. Benefits offered by these schemes are largely based on pensionable pay and years of service at retirement. With the

exception of plans in Germany and France, the assets of these schemes are held in administered funds that are legally separated from the company. The trustees of the pension fund are required by law to act in the interest of the fund and of all relevant stakeholders of the scheme and are responsible for the investment policy with regard to the assets of the fund.

Within Germany, there are three types of defined benefit pension schemes, two of which are closed to new entrants. All of the schemes are unfunded. The scheme for active members in Germany is a pension commitment based on a percentage of the yearly income paid via the pension organisation 'Essener Verband'. The defined benefit schemes in the USA are closed for future accrual. TSN makes sufficient contributions required to fund the cost of benefits provided by the USA schemes and to increase the funding ratio to 100% over a period of 15 years. Pension provision for new entrants in the USA is by means of a defined contribution scheme.

TSN accounts for all pension and post-retirement benefit arrangements using IAS 19 'Employee benefits' with independent actuaries being used to calculate the costs, assets and liabilities to be recognized in relation to these schemes. The present value of the defined benefit obligation, the current service cost and past service costs are calculated by these actuaries using the projected unit credit method. However, the ongoing funding arrangements of each scheme, in place to meet their long-term pension liabilities, are governed by the individual scheme rules and national legislation. The accounting and disclosure requirements of IAS 19 do not affect these funding arrangements.

The key assumptions applied at the end of the reporting period for the purposes of the actuarial valuations were as follows:

2025	Germany	USA	Other
	%	%	%
Salary growth	0.00	0.00	1.50 to 3.00
Pension increases	2.25	0.00 to 2.50	0.00
Discount rate	3.70	5.32 to 5.40	1.10 to 3.30
Inflation	2.75	3.00	1.00 to 2.00
2024	Germany	USA	Other
	%	%	%
Salary growth	2.50	0.00	1.50 to 3.00
Pension increases	2.25	0.00	0.00
Discount rate	3.50	5.00 to 5.20	1.60 to 3.50
Inflation	2.75	3.00	1.20 to 2.00

Actuarial assumptions

A range of assumptions must be used to determine the IAS 19 amounts and the values to be included in the balance sheet and income statement can vary significantly with only small changes in these assumptions. Furthermore, the actuarial assumptions used may vary according to the country in which the plans are situated.

The discount rate is set with reference to the current rate of return on AA rated corporate bonds of equivalent currency and term to the scheme liabilities. Projected inflation rates and pension increases are long-term predictions based mainly on the yield gap between long-term fixed interest and government bond securities.

Demographic assumptions are set having regard to the latest trends in life expectancy, plan experience and other relevant data, including externally published actuarial information within each national jurisdiction. The assumptions are reviewed and updated as necessary as part of the periodic actuarial funding valuations of the individual pension and post-retirement plans.

Income statement costs

Under IAS 19 costs in relation to pension and post-retirement plans mainly arise as follows:

- The current service cost is the actuarially determined present value of the pension benefits earned by employees in the current period.
- It excludes any charges or credits in respect of any deficit or surplus in the scheme respectively and so the cost is unrelated to whether, or how, the scheme is funded.
- Net interest cost / (income) on the liability or asset recognised in the balance sheet. These items are treated as a net operating cost in the income statement within employment costs.

Variations from expected costs, arising from the experience of the plans or changes in actuarial assumptions, are recognised immediately in the statement of comprehensive income. Examples of such variations are differences between the discount rate used for calculating the return on scheme assets and the actual return, the remeasurement of scheme liabilities to reflect changes in discount rates, changes in demographic assumptions such as using updated mortality tables, or the effect of more employees leaving service than forecast.



Income statement pension costs arose as follows:

2025	Netherlands	Germany	USA	Other	Total
	€m	€m	€m	€m	€m
Current service cost	-	-	-	-	-
Net interest cost	-	2	1	-	3
Defined benefit schemes	-	2	1	-	3
Defined contribution schemes	116	1	1	1	119
Total charge for the period	116	3	2	1	122

2024	Netherlands	Germany	USA	Other	Total
	€m	€m	€m	€m	€m
Current service cost	-	-	-	1	1
Net interest cost	-	2	-	-	2
Defined benefit schemes	-	2	-	1	3
Defined contribution schemes	105	-	1	5	111
Total charge for the period	105	2	1	6	114

Plan assets

The asset classes of plan assets of the Groups’ defined benefit schemes include national and international equities, fixed income government and non-government securities and real estate. The pension funds invest in diversified asset classes to maximise returns while reducing volatility. The percentage of total plan assets for each category of investment was as follows:

2025	USA	Other <sup>1</sup>
	%	%
Quoted:		
Equities	12.7	33.8
Bonds – Fixed Rate	84.8	26.2
	97.5	60.0
Unquoted:		
Real estate	-	22.7
Cash and cash equivalents	2.5	1.9
Other <sup>1</sup>	-	15.4
	2.5	40.0
Total	100.0	100.0

2024	USA	Other <sup>1</sup>
	%	%
Quoted:		
Equities	12.7	58.8
Bonds – Fixed Rate	84.8	-
	97.5	58.8
Unquoted:		
Real estate	-	23.2
Cash and cash equivalents	2.5	2.9
Other <sup>1</sup>	-	15.1
	2.5	41.2
Total	100.0	100.0

<sup>1</sup>Other predominantly relates to Montana Bausysteme AG.

Balance sheet measurement

In determining the amounts to be recognised in the balance sheet the following approach has been adopted:

- Pension scheme assets are measured at fair value (for example for quoted securities this is the bid-market value on the relevant public exchange).
- Pension liabilities include future benefits that will be paid to pensioners and deferred pensioners, and accrued benefits which will be paid in the future for members in service taking into account projected earnings. As noted above, the pension liabilities are discounted with reference to the current rate of return on AA rated corporate bonds of equivalent currency and term to the pension liability.

Amounts recognised in the balance sheet arose as follows:

2025	Germany	USA	Other	Total
	€m	€m	€m	€m
Fair value of plan assets at end of period	-	81	29	110
Present value of obligation at end of period	(51)	(86)	(31)	(168)
Defined benefit liability at end of period	(51)	(5)	(2)	(58)
Disclosed as:				
Defined benefit asset	-	-	1	1
Defined benefit liability - current	-	-	(2)	(2)
Defined benefit liability -non current	(51)	(5)	(1)	(57)
Defined benefit liability at end of period	(51)	(5)	(2)	(58)

2024	Germany	USA	Other	Total
	€m	€m	€m	€m
Fair value of plan assets at end of period	-	85	29	114
Present value of obligation at end of period	(54)	(91)	(29)	(174)
Defined benefit liability at end of period	(54)	(6)	-	(60)
Disclosed as:				
Defined benefit asset	-	-	3	3
Defined benefit liability - current	-	(2)	-	(2)
Defined benefit liability -non current	(54)	(4)	(3)	(61)
Defined benefit liability at end of period	(54)	(6)	-	(60)

The movements in the present value of plan assets and defined benefit obligations in 2025 and 2024 were as follows:

2025	Germany	USA	Other	Total
	€m	€m	€m	€m
Plan assets:				
As at 1 April 2024	-	85	29	114
Return on plan assets less than the discount rate	-	(1)	(1)	(2)
Interest income on plan assets	-	4	-	4
Contributions from the employer	-	-	1	1
Contributions from employees	-	-	1	1
Settlements	-	-	-	-
Benefits paid	-	(8)	-	(8)
Exchange rate movements	-	1	(1)	-
As at 31 March 2025	-	81	29	110
Benefit obligations:				
As at 1 April 2024	(54)	(91)	(29)	(174)
Current service cost	-	-	-	-
Interest cost on the defined benefit obligation	(2)	(5)	-	(7)
Settlements	-	-	-	-
Contributions from the employees	-	-	-	-
Actuarial loss due to financial assumption changes	2	-	(2)	-
Actuarial gain due to actuarial experience	-	2	-	2
Benefits paid	3	8	-	11
Exchange rate movements	-	-	-	-
As at 31 March 2025	(51)	(86)	(31)	(168)

Included within other schemes above are post-retirement medical and similar net obligations of €4m (2024: €4m).

2024	Germany	USA	Other	Total
	€m	€m	€m	€m
Plan assets:				
As at 1 April 2023	-	89	23	112
Return on plan assets less than the discount rate	-	(1)	-	(1)
Change in effect for asset ceiling	-	-	2	2
Interest income on plan assets	-	4	1	5
Contributions from the employer	-	6	2	8
Settlements	-	(6)	-	(6)
Benefits paid	-	(8)	-	(8)
Exchange rate movements	-	1	1	2
As at 31 March 2024	-	85	29	114
Benefit obligations:				
As at 1 April 2023	(54)	(102)	(23)	(179)
Current service cost	-	-	(1)	(1)
Interest cost on the defined benefit obligation	(2)	(5)	(2)	(9)
Settlements	-	6	-	6
Contributions from the employees	-	-	(1)	(1)
Actuarial loss due to financial assumption changes	-	-	(1)	(1)
Actuarial gain due to actuarial experience	-	2	-	2
Benefits paid	2	8	-	10
Exchange rate movements	-	-	(1)	(1)
As at 31 March 2024	(54)	(91)	(29)	(174)

Actuarial gains recorded in the Statement of Comprehensive Income for the period were €1m (2024: gain of €1m).

32. Disposal of Group companies

During the year, the Group completed the dissolution of the below 2 subsidiaries, having previously entered them into liquidation.

- Oremco Inc. (Dissolved 18 October 2024)
- Demka BV (Dissolved 31 March 2025)

33. Related party transactions

The table below sets out details of transactions and loans between TSN, other Tata Steel companies, joint ventures and associates.

	2025	2024
	€m	€m
Sales to joint ventures	70	95
Sales to associates	129	109
Sales to other Tata Steel companies	416	429
Purchases from joint ventures	-	-
Purchases from associates	38	37
Purchases of raw materials from other Tata Steel companies	1.512	1.397
Other purchases from other Tata Steel companies	255	347
Net recharges to other Tata Steel companies	(42)	(14)
Amounts owed by other Tata Steel companies (Note 15)	66	21
Amounts owed by joint ventures (Note 15)	8	10
Amounts owed by associates (Note 15)	14	15
Amounts owed to other Tata Steel companies (Note 18)	280	350
Amounts owed to associates (Note 18)	3	3
Tax payable/(receivable) to TSNH (Note 14)	(154)	(97)
Loans to other Tata Steel companies (Note 15)	-	-
Loans from other Tata Steel companies (Note 19)	22	23

Transactions with related parties are made on terms equivalent to those that prevail in arm’s length transactions.

Details of transactions with key management personnel are given in ‘Further notes to and signing of the annual accounts’ on page 161.

34. Consolidated subsidiaries

The subsidiary undertakings of TSN on 31 March 2025 are set out below. Country names are countries of incorporation. Undertakings operate principally in their country of incorporation except where otherwise stated.

Unless indicated otherwise, subsidiary undertakings owned by TSN, and TSN holding comprises ordinary shares and 100% of the voting rights.

**Subsidiary undertakings**  
Steel producing, further processing or related activities:

<b>Belgium</b> Société Européenne de Galvanisation (Segal) SA Tata Steel Belgium Packaging Steels N.V. Tata Steel Belgium Services NV	Tata Steel Nederland Tubes B.V. <b>Norway</b> Norsk Stal Tynnplater AS
<b>Czech Republic</b> Tata Steel International (Czech Republic) S.R.O.	<b>Poland</b> Tata Steel International (Poland) Sp.Zo.o
<b>France</b> Corbeil Les Rives SCI (67.3%) Tata Steel France Holdings SAS Tata Steel International (France) SAS Tata Steel Maubeuge SAS Unitol SAS	<b>Republic of Ireland</b> Corus Ireland Ltd
<b>Finland</b> Naantali Steel Service Centre OY	<b>Spain</b> Layde Steel SL Tata Steel International Iberica SA
<b>Germany</b> Degels GmbH Fischer Profil GmbH FP Produktions-Und Vertiebs GmbH Hille & Muller GmbH S A B Profil GmbH Service Center Gelsenkirchen GmbH Tata Steel Germany GmbH Tata Steel International (Germany) GmbH	<b>Sweden</b> Halmstad Steel Service Centre AB Norsk Stal Tynnplater AB Tata Steel International (Sweden) AB
<b>Italy</b> Tata Steel International (Italia) SRL	<b>Switzerland</b> Montana Bausysteme AG
<b>The Netherlands</b> C.V. Bénine Grijze Poort B.V. Huizenbezit Breesaap B.V. S.A.B. Profiel B.V. Service Centre Maastricht B.V. Tata Steel IJmuiden B.V. Tata Steel Nederland Consulting & Technical Services B.V. Tata Steel Nederland Services B.V. Tata Steel Nederland Technology B.V.	<b>Turkey</b> Tata Steel Istanbul Metal Sanayi ve Ticaret AS
	<b>USA</b> Apollo Metals Ltd Hille & Muller USA Inc. Hoogovens USA Inc. Rafferty-Brown Steel Co. Inc. Tata Steel USA Inc. Apollo Metals Ltd Thomas Processing Company Thomas Steel Strip Corp.



35. Joint ventures, joint operations and associates

	Classification	Products	2025 Turnover		Issued capital Number of shares	% held
			€m			
<b>Mexico</b>	Joint	Inactive company	-	-	-	50
Hoogovens Gan	Venture	(in liquidation)				
Multimedia SA de CV						
<b>The Netherlands</b>	Associate	Maintenance of parts of direct	15	Shares of	100	50
GietWalsOnderhoud		sheet plant		€454		
Combinatie B.V.						
Hoogovens Court Roll Surface	Joint	Processing chrome deposit on roll	4	-	-	50
Technologies VOF	Operation					
Laura Metaal	Joint	Trading and processing of non-prime	107	Shares of	5,600	49
Holding B.V.	Venture	metal		€454		
Wupperman Staal Nederland B.V.	Associate	Purchase, process, refine and sale of	284	Shares of	8,000	30
		steel products and other		€1,000		
		metal products				
Tata Steel Ticaret AS	Joint	Sales office	2	Shares of	80,000	50
	Venture			TL-1		

36. Ultimate and immediate parent company

Tata Steel Netherlands Holdings B.V. is the company’s immediate parent company, which is incorporated and registered in the Netherlands.

Tata Steel Limited, a company incorporated in India, is the ultimate parent company and controlling party.

Copies of the Report & Accounts for TSL may be obtained from its registered office at Bombay House, 24 Homi Mody Street, Mumbai, 400-01.

37. Subsequent events

To realize the decarbonisation plans, it is crucial to strengthen the competitiveness and improve both financial and operational performance of TSN. In order to achieve this, TSN announced on April 9, 2025 a proposal to make a significant change in the organizational structure; create a smaller and more centrally organized Tata Steel Nederland. This will also result in a reduction in the number of jobs. In total, up to about 1.600 FTEs will be redundant at Tata Steel IJmuiden. This reorganization is part of a larger transformation program, which aims to drastically improve the performance of the company. As a next step, a detailed request for advice was submitted to the Central Works Council on July 8, 2025.

Company income statement

For the financial period ended 31 March	2025	2024
	€m	€m
Profit/(Loss) subsidiaries	(195)	(535)
Other income and charges, after taxation	(9)	(21)
<b>Net profit/(Loss) after taxation</b>	<b>(204)</b>	<b>(556)</b>

Company balance sheet

At 31 March	Note	2025	2024
		€m	€m
Before appropriation of the result for the year			
<b>Non-current assets</b>			
Investments in group companies	1	3.102	3.307
Loans to own group companies	1	101	102
Deferred tax assets	2	4	-
Non-current tax assets	2	15	-
Other non-current assets	3	17	-
		3.239	3.409
<b>Current assets</b>			
Receivables	4/5	297	347
Cash and short-term deposits	6	255	14
		552	361
<b>TOTAL ASSETS</b>		<b>3.791</b>	<b>3.770</b>
<b>Current liabilities</b>			
Borrowings	7	(424)	(545)
Amounts owed to subsidiaries	8	(16)	(9)
Other payables	8	(23)	(14)
		(463)	(568)
<b>Non-Current liabilities</b>			
Other Non-Current liabilities	9	(17)	-
Borrowings	10	(310)	-
		(327)	-
<b>Provisions</b>	11	-	(2)
		-	(2)
<b>TOTAL LIABILITIES</b>		<b>(790)</b>	<b>(570)</b>
<b>NET ASSETS</b>		<b>3.001</b>	<b>3.200</b>
<b>Equity</b>			
Called-up share capital	12	388	388
Share premium account	12	17	17
Legal Reserves	12	24	18
Other components of Equity	12	2.776	3.333
Result of the period	12	(204)	(556)
<b>Total Equity</b>		<b>3.001</b>	<b>3.200</b>

Parent company 2025 accounts

Significant accounting policies

Basis of preparation

The company’s financial statements are prepared based on the accounting principles of recognition, measurement and determination of profit, as applied in the consolidated financial statements. These principles also include the classification and presentation of financial instruments, being equity instruments or financial liabilities This is in accordance with article 362.8 of Part 9 Book 2 of the Dutch Civil Code. Participations in consolidated entities are accounted for using the asset value method applying the same accounting policies as those used in the consolidated financial statements.

Investments in subsidiaries, joint ventures and associates

Investments in subsidiaries, joint ventures and associates are measured at net asset value (equity method of accounting). Net asset value is based on the measurement of assets (including goodwill), provisions

and liabilities, and determination of profit, as described in Note 10 to the consolidated financial statements for equity accounted investments. Goodwill is subsumed in the carrying amount of the net asset value if an investment in a subsidiary is acquired through the Company’s intermediate subsidiary.

Presentation of Company accounts and accounting policies

The company statement of income has been prepared in accordance with Art. 2:402 DCC, which allows a simplified Statement of income in the Company financial statements if a comprehensive Statement of income is included in the consolidated Group financial statements.

Information on the use of financial instruments is provided in Note 21 of the consolidated report and accounts.

Notes to the company accounts

1. Financial fixed assets

	Investments in group companies	Loans to own group companies	Total
	€m	€m	€m
Balance sheet value at 1 April 2024	3.307	102	3.409
Movements in 2024/25:			
Loss subsidiaries	(195)	-	(195)
Other comprehensive loss	(3)	-	(3)
Additions	-	18	18
Disposal <sup>1</sup>	(7)	-	(7)
Loan reclassification	-	(5)	(5)
Loan redemptions	-	(14)	(14)
At 31 March 2025	3.102	101	3.203

<sup>1</sup> Liquidation of Demka B.V in March 2025

Tata Steel Nederland participates as the central treasury entity in a cash pooling arrangement. Balances arising from the cash pool are presented as loans to own group companies.

The maturity of the Loans to own group companies is as follows:

	2025	2024
	€m	€m
In one year or less or on demand	-	-
Between one and five years	81	82
More than five years	20	20
	101	102

2. Deferred tax assets

	2025	2024
	€m	€m
Deferred tax asset	4	-
Intercompany corporate income tax receivable	15	-
	19	-

TSN has an intercompany corporate income tax receivablef rom the head of the Dutch fiscal unity  
Tata Steel Netherlands Holding B.V.

3. Other non-current assets

	2025	2024
	€m	€m
Derivative financial instruments	17	-
	17	-

4. Receivables

	2025	2024
	€m	€m
Receivables from subsidiaries	278	326
Derivative financial instruments	18	12
Other debtors	1	2
	297	340

Tata Steel Nederland participates as the central treasury entity in a cash pooling arrangement.  
At the reporting date cash pool receivables of €268 million are included within receivables from subsidiaries.

All receivables fall due within one year.  
Derivative financial instruments comprise forward foreign currency contracts and emission rights contracts.

5. Current tax assets

	2025	2024
	€m	€m
Dutch corporation tax assets	-	7
	-	7

6. Cash and short-term deposits

	2025	2024
	€m	€m
Cash at bank and in hand	255	14
Short-term deposits	-	-
	255	14

The cash balances disclosed above and in the statement of cash flows are not subject to regulatory restrictions and are therefore available for use.

7. Borrowings

	2025	2024
	€m	€m
<b>Borrowings</b>		
Borrowings from subsidiaries	402	443
Borrowings from other Tata Steel companies	22	22
Borrowings from joint venture	-	5
Bank and other loans	-	75
<b>Total</b>	<b>424</b>	<b>545</b>

Tata Steel Nederland participates as the central treasury entity in a cash pooling arrangement. Balances arising from the cash pool are presented as borrowings from subsidiaries. The borrowings from TSN group companies bear interest rates based on EURIBOR or official local rates. These rates are fixed for periods up to six months.

8. Other payables

	2025	2024
	€m	€m
Amounts owed to subsidiaries	16	9
Derivative financial instruments	18	12
Other payables	5	2
	<b>39</b>	<b>23</b>

Derivative financial instruments comprise forward foreign currency contracts and emission rights contracts.

9. Other non-current liabilities

	2025	2024
	€m	€m
Derivative financial instruments	17	-
	<b>17</b>	<b>-</b>

The non-current derivative financial instruments consist of forward purchase contracts for carbon emission rights.

10. Non-current borrowings

	2025	2024
	€m	€m
Bank and other Loans	310	-
	<b>310</b>	<b>-</b>

Bank loans consist of the revolving credit facility. The average interest rate during the year is 4,18%. Maturity date May 2027.

11. Provisions

	2025	2024
	€m	€m
Environmental Provision	-	2
<b>Total Provisions</b>	<b>-</b>	<b>2</b>

The environmental provision in 2024 relates to clean up costs of the Demka wharf.

12. Capital and reserves

	Share capital	Share premium account	Hedging reserve	Translation reserve	Other reserves	Total
	€m	€m	€m	€m	€m	€m
Balance as at 1 April 2023	388	17	(18)	16	3.219	<b>3.622</b>
Profit/(Loss) after taxation	-	-	-	-	(556)	<b>(556)</b>
Actuarial gains	-	-	-	-	-	-
Translation reserve	-	-	-	2	-	<b>2</b>
Other	-	-	-	-	112	<b>112</b>
Hedging reserve	-	-	20	-	-	<b>20</b>
<b>Balance as at 31 March 2024</b>	<b>388</b>	<b>17</b>	<b>2</b>	<b>18</b>	<b>2.775</b>	<b>3.200</b>
Profit/(Loss) after taxation	-	-	-	-	(204)	<b>(204)</b>
Actuarial gains	-	-	-	-	1	<b>1</b>
Translation reserve	-	-	-	2	-	<b>2</b>
Other	-	-	-	-	-	-
Hedging reserve	-	-	2	-	-	<b>2</b>
<b>Balance as at 31 March 2025</b>	<b>388</b>	<b>17</b>	<b>4</b>	<b>20</b>	<b>2.572</b>	<b>3.001</b>

The authorised share capital of the Company on 31 March 2025 amounts to €1.300.000.000 (31 March 2024: €1.300.000.000) and consists of 130.000.000 Ordinary shares of €10.00 each of which 38.760.710 Ordinary shares were issued and fully paid up. All the outstanding Ordinary shares were held by TSNH.

13. Commitments and contingent liabilities

	2025	2024
	€m	€m
Guarantees and securities on behalf of group companies	<b>106</b>	120

The amount outstanding relates to bank guarantees, guarantees for lease obligations and other obligations of subsidiaries. No contingent liabilities are outstanding per 31 March 2025.

Tata Steel Nederland BV has provided a declaration of liability, as referred to in Article 403, Book 2, of the Dutch Civil Code, for the debts of its subsidiaries Tata Steel Nederland Technology BV and Tata Steel Nederland Services BV.

Since 1 January 2008 Tata Steel Nederland BV and most of its Dutch subsidiaries are part of the fiscal entity “Tata Steel Netherlands Holdings BV”, which is the ultimate parent within the fiscal entity. Under the Dutch Collection of State Taxes Act, the company and its fellow fiscal unity members are jointly and severally liable for any taxes payable (e.g., VAT and Corporate Income Tax) by the group. Subsidiaries settle tax positions within the fiscal unity as if it were an autonomous taxpayer, according to the subsidiary's fiscal result.

- The Company has provided a letter of support to:
- Tata Steel Germany GmbH to enable this company to continue its operations under normal conditions until the date of the approbation by the shareholder of the financial statements for the year ending 31 March 2027. This confirmation is made in relation with the going concern assumption used in preparing the statutory financial statements for the twelve month period which ended on 31 March 2025.
  - Tata Steel Nederland Tubes BV to provide adequate resources to enable this company to continue its operations under normal conditions until at least 1 January 2026. This confirmation is made in relation with the going concern assumption used in preparing the statutory financial statements for the twelve month period which ended on 31 March 2024.



14. Audit fees

2025	PricewaterhouseCoopers Accountants N.V.	Other PwC network	Total PwC Network	
	€m	€m	€m	
	Audit of the financial statements	1.7	0.7	2.4
	Other audit procedures	0.7	-	0.7
	Tax services and other non-audit services	-	-	-
	Total Audit fees	2.4	0.7	3.1

2024	PricewaterhouseCoopers Accountants N.V.	Other PwC network	Total PwC Network	
	€m	€m	€m	
	Audit of the financial statements	1.5	0.7	2.2
	Other audit procedures	0.2	-	0.2
	Tax services and other non-audit services	-	-	-
	Total Audit fees	1.7	0.7	2.4

The fees listed above relate to the procedures applied to the company and its consolidated group entities by accounting firms and external auditors as referred to in article 1(1) of the Dutch Accounting Firms Oversight Act (Dutch acronym: Wta) as well as by Dutch and foreign-based accounting firms, including their tax services and advisory groups. These fees relate to the audit of the 2024/25 financial statements, regardless of whether the work was performed during the financial year. Other audit procedures relate to the quarterly review procedures performed for Tata Steel IJmuiden B.V. and the BRSR Core ESG assurance engagement.

15. Other

No employees are employed by the Company, unchanged from the previous reporting period.

Further notes to and signing of the annual accounts

Group and affiliated companies and other capital interests

A list forming part of the Annual Accounts with names and other particulars of companies in which Tata Steel Nederland BV directly or via group companies participates or holds capital interests in other ways has been filed with the Trade Register in Amsterdam.

Remuneration of and loans to members of the Board of Management and of the Supervisory Board

	2025	2024
	€k	€k
The total employment costs of the Board of Management of Tata Steel Nederland BV were:		
Short term employee benefits	3.766	2.489
Long term employment benefits	278	233
Post-employment benefits	616	372
Total emoluments of current and former members	4.660	3.094

Employment costs relate to all activities within the Group of the members of the Board of Management. The emoluments of Mr T V Narendran and Mr K Chatterjee are paid by TSL which makes no recharge to TSN. Mr T V Narendran and Mr K Chatterjee are directors of TSL, TSN and a number of fellow subsidiaries of TSL and it is not possible to make an accurate apportionment of their emoluments in respect of each of the subsidiaries. Accordingly, the above details include no emoluments for the aforementioned, whose emoluments are disclosed in the financial statements of TSL with whom they have their primary employment contract.

There were no loans outstanding to members of the Board of Management as of 31 March 2025 or 31 March 2024.

The Annual General Meeting of Shareholders determines the remuneration of the members of the Supervisory Board.

	2025	2024
	€k	€k
Remuneration of current and former members of the Supervisory Board*	189	167
* Borne by the Company and its subsidiaries		

The members of the Supervisory Board do not own any securities in the Company’s capital or rights thereto.

**Appropriation of the result for the financial year 2025**

We propose to add the loss of €204m over the financial year 2025 to the Retained Earnings.

During the year ended 31 March 2025 no dividend was paid.

**Signing of the Annual Accounts**

The 2025 Annual Accounts of Tata Steel Nederland BV have been signed by all the members of the Board of Management and by all the members of the Supervisory Board.

Velsen-Noord, 25 July 2025

**Board of Management**

J. van den Berg, CEO  
J. Turkesteen  
A. Latchman

**Supervisory Board**

T.V. Narendran, Chair  
C. Zuiderwijk  
H. Dijkhuizen  
K. Chatterjee

# OTHER INFORMATION

## Other Information

### **Independent Auditor's Report**

Reference is made to the Independent Auditor's Report as included hereinafter.

### **Appropriation of result according to Articles of Association**

Article 36, of the Articles of Association stipulates that, the profit for the year is at the disposal of the General Meeting of Shareholders.







# Independent auditor’s report

To: the general meeting and the supervisory board of Tata Steel Nederland B.V.

## Report on the audit of the annual accounts 2024/2025

### Our opinion

In our opinion:

- the consolidated annual accounts of Tata Steel Nederland B.V. together with its subsidiaries ('the Group') give a true and fair view of the financial position of the Group as at 31 March 2025 and of its result and cash flows for the year then ended in accordance with IFRS Accounting Standards as adopted by the European Union ('EU') and with Part 9 of Book 2 of the Dutch Civil Code;
- the company annual accounts of Tata Steel Nederland B.V. ('the Company') give a true and fair view of the financial position of the Company as at 31 March 2025 and of its result for the year then ended in accordance with Part 9 of Book 2 of the Dutch Civil Code.

### What we have audited

We have audited the accompanying annual accounts 2024/2025 of Tata Steel Nederland B.V., Velsen-Noord. The annual accounts comprise the consolidated annual accounts of the Group and the company annual accounts.

The consolidated annual accounts comprise:

- the consolidated balance sheet as at 31 March 2025;
- the following statements for 2024/2025: the consolidated income statement, the consolidated statements of comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows; and
- the notes to the annual accounts, including material accounting policy information and other explanatory information.

The company annual accounts comprise:

- the company balance sheet as at 31 March 2025;
- the company income statement for the year then ended; and
- the notes, comprising a summary of the accounting policies applied and other explanatory information.



The financial reporting framework applied in the preparation of the annual accounts is IFRS Accounting Standards as adopted by the EU and the relevant provisions of Part 9 of Book 2 of the Dutch Civil Code for the consolidated annual accounts and Part 9 of Book 2 of the Dutch Civil Code for the company annual accounts.

### The basis for our opinion

We conducted our audit in accordance with Dutch law, including the Dutch Standards on Auditing. We have further described our responsibilities under those standards in the section 'Our responsibilities for the audit of the annual accounts' of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Independence

We are independent of Tata Steel Nederland B.V. in accordance with the 'Wet toezicht accountantsorganisaties' (Wta, Audit firms supervision act), the 'Verordening inzake de onafhankelijkheid van accountants bij assuranceopdrachten' (ViO, Code of Ethics for Professional Accountants, a regulation with respect to independence) and other relevant independence regulations in the Netherlands. Furthermore, we have complied with the 'Verordening gedrags- en beroepsregels accountants' (VGBA, Dutch Code of Ethics).

### Our audit approach

We designed our audit procedures with respect to the key audit matters, fraud and going concern, and the matters resulting from that, in the context of our audit of the annual accounts as a whole and in forming our opinion thereon. Therefore we do not provide separate opinions or conclusions on information in support of our opinion, such as our findings and observations related to individual key audit matters and the audit approach to address fraud risk and going concern.

### Overview and context

Tata Steel Nederland B.V. is one of the major steel producers in mainland Europe. The Group comprises several components and therefore we considered our group audit scope and approach as set out in the section 'The scope of our group audit'.

During the financial year 2024/2025 TSN's financial performance remained under pressure due to ongoing geopolitical tensions and continued economic downturn in the European Union, which resulted in decreased demand in the steel market. These external challenges significantly impacted the company's results, culminating in a financial loss for the year. In addition, the company is faced with increased challenges from the Environmental Agency on various environmental matters, which continues to create uncertainty around the retention of the permits required for steel production in the IJmuiden plant.



As part of designing our audit, we determined materiality and assessed the risks of material misstatement in the annual accounts. In particular, we considered where the board of management made important judgements, for example, in respect of significant accounting estimates that involved making assumptions and considering future events that are inherently uncertain. In these considerations, we paid attention to, amongst others, the assumptions underlying the physical and transition risk related to climate change.

In section V ‘Use of estimates and critical accounting judgments’ of the annual accounts, the Company describes the areas of judgement in applying accounting policies and the key sources of estimation uncertainty. Given the significant estimation uncertainty and the related higher inherent risks of material misstatement in the impairment assessment of property, plant and equipment CGU Business Unit Tata Steel IJmuiden, we considered this matter as a key audit matter as set out in the section ‘Key audit matters’ of this report. Furthermore, we identified the risk of non-compliance with laws and regulations as key audit matter given the significance of ongoing environmental matters and significant level of uncertainty of their outcomes.

Tata Steel Nederland B.V. assessed the possible effects of climate change and its plans to meet its net zero commitments in the section 'Climate change' of the Sustainability statement in the annual report. The company aims to achieve net-zero CO2 emissions for Scope 1 and 2 by 2045, aligning with the Tata Group's climate targets and the Paris Agreement. This involves a two-phase ‘Green Steel Plan’ to replace current coal-dependent assets at the IJmuiden steel plant with Direct Reduced Iron and Electric Arc Furnaces, using natural gas and when economically viable hydrogen, whereby the latter may at one day be generated from renewable sources, and the implementation of a large number of other measures across all operations.

Tata Steel Nederland B.V. has elaborated on the uncertainties arising from climate change, as well as the actions taken and to be taken with regards to decarbonisation, in the risk section of the annual report. In the explanation of the materiality analysis, the company further discusses actions already taken and analyses yet to be performed regarding determining the financial impact of the various topics from the materiality analysis on the company. A key uncertainty is the level of Dutch government support as well as whether a level playing field for the European steel sector will be created, regarding carbon taxes on top of the European ETS and grid connection cost.

The board of management has taken into account the potential impact of climate change when determining estimates in the financial statements and has elaborated on this in section V ‘Use of estimates and critical accounting judgements’ of the annual accounts.

Together with our sustainability reporting specialists, we have held discussions with company's management about the impact of climate change and the climate targets on the company. In our audit, we did not identify climate change as a separate key audit matter but included it in the key audit matters that were identified given their interrelationship.

We have evaluated the potential impact of the committed net climate targets on the financial position, including the underlying assumptions and estimates, for example, regarding future cash flows and significant assumptions in the impairment model of property, plant and equipment, as well as the related disclosures in the annual accounts.

We ensured that the audit teams at both group and component level included the appropriate skills and competences which are needed for the audit of a steel company that operates internationally. We therefore included experts and specialists in the areas of amongst others IT systems, valuation of assets, sustainability, legal expertise and international taxes in our team.



## Materiality

The scope of our audit was influenced by the application of materiality, which is further explained in the section ‘Our responsibilities for the audit of the annual accounts’.

Based on our professional judgement we determined certain quantitative thresholds for materiality, including the overall materiality for the annual accounts as a whole as set out in the table below. These, together with qualitative considerations, helped us to determine the nature, timing and extent of our audit procedures on the individual financial statement line items and disclosures and to evaluate the effect of identified misstatements, both individually and in aggregate, on the annual accounts as a whole and on our opinion.

<b>Overall group materiality</b>	€60 million (2023/2024: €79 million).
<b>Basis for determining materiality</b>	We used our professional judgement to determine overall materiality. As a basis for our judgement, we used 2% of net assets.
<b>Rationale for benchmark applied</b>	We used net assets as the primary benchmark, a generally accepted auditing practice, based on our analysis of the common information needs of the users of the annual accounts. On this basis, we believe that net assets is the most relevant metric for the financial performance of the Company. We lowered the benchmark from 2,5% of last year to 2% as a result of the uncertainties related to the company's decarbonisation route, the need for government support and further increased scrutiny from the Environmental Agency and society.
<b>Component materiality</b>	Based on our judgement, we allocate materiality to each component in our audit scope that is less than our overall group materiality. The range of materiality allocated across components was between €3,6 million and €60 million. Certain components were audited to a local statutory audit materiality that was also less than our overall group materiality.

We also take misstatements and/or possible misstatements into account that, in our judgement, are material for qualitative reasons.

We agreed with the supervisory board that we would report to them any misstatement identified during our audit above €3 million (2023/2024: €3,9 million) as well as misstatements below that amount that, in our view, warranted reporting for qualitative reasons.

## The scope of our group audit

Tata Steel Nederland B.V. is the parent company of a group of entities. The financial information of this group is included in the consolidated annual accounts of Tata Steel Nederland B.V.

We are responsible for the identification and assessment of the risks of material misstatement of the annual accounts of the group, including those with respect to the consolidation process. Based on our risk assessment, we tailored the scope of our audit to ensure that we, in aggregate, performed sufficient work on the annual accounts to enable us to provide an opinion on the annual accounts as a whole.



In setting the scope of our group audit we determined what audit work needed to be performed at group level or component level and whether involvement of component auditors was necessary.

Based on this outcome, we subjected 6 components to audits of their complete financial information, as those components are considered significant due to risk or size. Additionally, we selected 1 component for specified audit procedures to achieve appropriate coverage on financial line items in the consolidated annual accounts .

In total, in performing these procedures, we achieved the following coverage on the financial line items:

<i>Revenue</i>	83%
<i>Total assets</i>	90%
<i>Profit before tax</i>	83%
<i>Net assets</i>	80%

None of the remaining components represented more than 3% of total group revenue or 2% of total group assets. For those remaining components we performed, among other things, analytical procedures to corroborate our assessment that there were no significant risks of material misstatements within those components.

We conducted audit work on seven components in three countries. The group engagement team performed the audit work on the Dutch entities. In addition, the group team performed the audit procedures with respect to the consolidation, disclosures in the annual accounts, the valuation of property, plant and equipment of CGU Business Unit Tata Steel IJmuiden, and the risk of non-compliance with laws and regulations, and the company's ability to continue as going concern.

We have engaged component auditors to audit foreign components. Where component auditors performed the work, we determined the level of involvement we needed to have in their audit work to be able to conclude whether we had obtained sufficient and appropriate audit evidence as a basis for our opinion on the consolidated annual accounts as a whole.

Site visits were conducted to components in the Netherlands and France. Furthermore, we held videoconferences with all auditors of the components that were part of the group audit.

Where component auditors performed the work, we determined the nature, timing and extent of direction and supervision of the component auditors and review of their work. Furthermore we:

- Issued group audit instructions to component auditors to set expectations for the component auditor's work and facilitate our direction and supervision of the component auditor and review of their work.
- Participated in discussions with component auditors as part of planning the engagement, including when we as the group auditor assigned tasks or procedures such as the performance of risk assessment procedures or determining the nature, timing and extent of audit responses to identified and assessed risks of material misstatement to component auditors.
- Communicated with component auditors throughout the course of the group audit, either virtually by leveraging technology solutions, in-person meetings (e.g., as part of a site visit to the component auditor's territory), or through a combination of these, in order to monitor the progress of the component auditor's work. These ongoing communications included matters affecting the execution, completion and reporting of the group audit.



- Reviewed relevant parts of the component auditor's work including the component auditor's communication of matters relevant to our conclusion with regard to the group audit. Our review of the component auditor's work took place throughout the engagement. This included on-site and/or virtual reviews, including of the component auditor's working papers.
- Reviewed formal written communications prepared by the component auditor for component management of the component and/or regulatory authorities of the component, that were, based on our judgment, relevant to the group audit.
- Attended certain key client meetings (e.g. the closing meeting) between the component auditor and component management.

By performing the procedures outlined above at the components, combined with additional procedures exercised at group level, we have been able to obtain sufficient and appropriate audit evidence on the Group's financial information, to provide a basis for our opinion on the consolidated annual accounts.

## Audit approach fraud risks

We identified and assessed the risks of material misstatements of the annual accounts due to fraud. During our audit we obtained an understanding of Tata Steel Nederland B.V. and its environment and the components of the internal control system. This included the board of management's risk assessment process, the board of management's process for responding to the risks of fraud and monitoring the internal control system and how the supervisory board exercised oversight, as well as the outcomes. We refer to section 'Risk management and compliance' of the report of the board of management for management's fraud risk disclosure.

We evaluated the design and relevant aspects of the internal control system with respect to the risks of material misstatements due to fraud, as well as the code of conduct, and whistleblower procedures. We evaluated the design and the implementation and, where considered appropriate, tested the operating effectiveness of internal controls designed to mitigate fraud risks.

We asked members of the management board as well as the internal audit department, legal affairs, and the supervisory board whether they are aware of any actual or suspected fraud. This did not result in the identification of actual or suspected fraud that may lead to a material misstatement.

As part of our process of identifying fraud risks, we evaluated fraud risk factors with respect to financial reporting fraud, misappropriation of assets and bribery and corruption. We evaluated whether these factors indicate that a risk of material misstatement due to fraud is present.

We identified the following fraud risks and performed the following specific procedures:





Identified fraud risks	Our audit work and observations
<p><b>Risk of management override of controls</b></p> <p>Inherently, management is in a unique position to perpetrate fraud because of management's ability to manipulate accounting records and prepare fraudulent annual accounts by overriding controls that otherwise appear to be operating effectively. That is why, in all our audits, we pay attention to the risk of management override of controls in:</p> <ul style="list-style-type: none"><li>• the appropriateness of journal entries and other adjustments made in the preparation of the annual accounts;</li><li>• possible management bias in management's significant estimates; and</li><li>• significant transactions, if any, outside the normal course of business for the Company.</li></ul> <p>Management is in the process of negotiations on custom made ('Maatwerk') support with the Dutch government for the decarbonisation of the Tata Steel plant in IJmuiden, which is crucial for the future of the plant.</p> <p>In this context, this could lead to management bias to understate the future financial results and cashflows to obtain more government support or overstate the current financial results to showcase the Company's added value to Dutch society.</p>	<p>Where relevant to our audit, we evaluated the design and implementation of the internal control system, that is intended to mitigate the risk of management override of controls and assessed the effectiveness of those measures in the processes of generating and processing journal entries and making estimates.</p> <p>We selected journal entries based on risk criteria and conducted specific audit procedures for these entries, including inspection of the source documentation to assess the validity of the business rationale and substantiation of corroborating evidence. In this context, we also tested the consolidation and elimination entries.</p> <p>We performed specific audit procedures related to possible management bias in significant estimates and judgements applied by management, such as listed in the section V 'Use of estimates and critical accounting judgements' of the chapter 'Presentation of consolidated accounts and accounting policies' in the annual accounts.</p> <p>These procedures include assessing management's ability to make reasonable estimates, by assessing previous estimations with actual outcomes, performing sensitivity analyses, test the underlying models, methodology and inputs to supporting evidence and challenge managements' assumptions as applicable.</p> <p>Specifically, for the judgements and estimations applied as part of the impairment testing of non-current assets, we engaged our valuation experts to develop independent range estimates of the discount rate and long-term growth rate.</p> <p>We recommended to management to formalise their fraud risk assessment.</p> <p>We verified that there were no significant transactions or events that were outside the normal course of business for the Group.</p> <p>Our audit procedures did not lead to specific indications of fraud with respect to management override of controls.</p>
<p><b>The risk of fraudulent financial reporting in revenue recognition</b></p> <p>With regard to the risk of fraud in revenue recognition, based on our risk assessment procedures, we concluded that this risk relates to the existence and occurrence (through recording of fictitious revenue transactions) and cut-off before and after year-end (through improperly shifting revenues between different periods) of revenue transactions.</p>	<p>We evaluated the design and implementation of the internal control system and assessed the effectiveness of relevant controls in the processes related to revenue recognition.</p> <p>Through data analysis, we tested unexpected journal entries based on revenue recognition criteria. We also performed relevant testing on revenue transactions throughout the year and the receivable balances at year-end. Our audit procedures included inspection of the source documentation to assess the validity of the business rationale and substantiation of corroborating evidence, testing the occurrence and cut-off of the related revenue.</p> <p>Our audit procedures did not lead to specific indications of fraud with respect to revenue recognition.</p>
<p><b>Inadequate considerations of the Tata Steel Nederland B.V.'s energy transition journey</b></p> <p>Tata Steel Nederland B.V. has made a public commitment on the decarbonisation strategy.</p> <p>This could lead to material misstatements as a result of bias in accounting estimates and disclosures.</p>	<p>Through inquiry with management, we have obtained an understanding of the feasibility of the Group's decarbonisation strategy/energy transition journey.</p> <p>We reviewed management's assessment on the accounting implications of such journey, including the valuation of property, plant and equipment of Cash Generating Unit Business Unit Tata Steel IJmuiden.</p> <p>Our procedures also included the assessment of the adequacy of the related disclosures in the annual report and accounts as made by the board of management.</p> <p>Our audit procedures did not lead to specific indications of fraud with respect to the adequacy of disclosures.</p>



Identified fraud risks	Our audit work and observations
<p><b>Valuation of property, plant and equipment</b></p> <p>For the identified potential fraud risk in the valuation of property, plant and equipment refer to the section "Key audit matters"</p>	<p>Refer to the section "Key audit matters".</p>

We incorporated an element of unpredictability in our audit and reviewed lawyer's letters. During the audit, we remained alert to indications of fraud. Furthermore, we considered the outcome of our other audit procedures and evaluated whether any findings were indicative of fraud or non-compliance with laws and regulations.

### Audit approach going concern

As disclosed in section II 'Basis of preparation' of the chapter 'Presentation of consolidated accounts and accounting policies' of the annual accounts, the board of management identified the challenging steel market conditions and uncertain macroeconomic outlook as events or conditions that may cast significant doubt on the entity's ability to continue as a going concern (hereafter: going-concern risk). In order to mitigate the effects of the identified events and conditions the board of management assessed the future funding requirements of the Group and obtained additional borrowing facilities.

Our procedures regarding the evaluation of the appropriateness of the board of management's use of the going-concern basis of accounting, including the board of management's plans to address the identified going-concern risk, included, amongst others:

- considered whether the board of management's going-concern assessment included all relevant information of which we were aware as a result of our audit and inquired with the board of management regarding the most important assumptions underlying its going-concern assessment;
- evaluated the board of management's current budget, including cash flows for at least twelve months from the date of the annual accounts, and whether it considered current developments in the industry and all relevant information of which we were aware as a result of our audit;
- evaluated the board of management's assessment that the orders under penalty and the notice of non-compliances as issued by the Dutch Environmental Agency are unlikely to lead to an early closure of the coke and gas plants within twelve months from the date of the annual accounts;
- evaluated the board of management's sensitivity analysis of the cash flow forecast to determine the liquidity need;
- analysed whether the current and the required financing has been secured to enable the continuation of the entirety of the Group's operations;
- performed inquiries of the board of management as to its knowledge of going-concern risks beyond the period of the board of management's assessment;
- assessed whether in section II 'Basis of preparation' of the chapter 'Presentation of consolidated accounts and accounting policies' of the annual accounts, the board of management adequately disclosed the going concern risk and the board of management's plans for future actions.



Our procedures did not result in outcomes contrary to management’s assessment on the appropriateness of the use of the going concern basis of accounting in the preparation of the annual accounts and we concluded that, based on the audit evidence obtained, no material uncertainty exists related to events or conditions that may cast significant doubt on the company’s ability to continue as a going concern. We found the disclosure in section II ‘Basis of preparation’ of the chapter ‘Presentation of consolidated accounts and accounting policies’ of the annual accounts to be adequate.

Our conclusions are based on the audit evidence obtained up to the date of our auditor’s report and are not a guarantee as to the company’s ability to continue as a going concern.

Although management expects no direct impact in the short term, the impact and consequences of climate change, requiring the Company to decarbonise its operations and make significant investments, may well impact the longer-term viability of the Company. In section ‘Risk management and compliance’ of the report of the board of management, the board of management disclosed the uncertainties associated with this longer-term risk as well as the mitigating actions taken by amongst others executing its decarbonisation plans.

### Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in the audit of the annual accounts. We have communicated the key audit matters to the supervisory board. The key audit matters are not a comprehensive reflection of all matters identified by our audit and that we discussed. In this section, we described the key audit matters and included a summary of the audit procedures we performed on those matters.

Key audit matter	Our audit work and observations
<b>Impairment assessment of Property, Plant and Equipment Cash Generating Unit Business Unit Tata Steel IJmuiden</b>  As at 31 March 2025, the carrying amount of property, plant and equipment (hereafter 'PP&E') of cash generating unit (hereafter 'CGU') Business Unit Tata Steel IJmuiden (hereafter 'TSIJ') was EUR 2.9 billion. In accordance with the requirements of IAS 36, the company assessed if there were any indicators for impairment and concluded that such indicators existed. Management performed an impairment assessment by comparing the recoverable amount to the carrying amount of the CGU TSIJ PP&E balance and concluded that no impairment was necessary. This assessment is disclosed in Note 9 to the consolidated annual accounts.  In determining the recoverable amount management applied assumptions reflecting the intended phased transition from blast furnace operations to direct reduced iron technology and electric smelting for steel production. The complexity arose from the sensitivity of the valuation of key assumptions, including future cash flows, discount rates, climate and environment related considerations, and government and shareholder support required for the company's energy transition journey. Due to the risk of management bias and the high degree of subjectivity involved we considered this a key audit matter.	<p>Together with our valuation specialists, we obtained an understanding of the company's impairment assessment process and evaluated the reasonableness of key assumptions used in estimating future cash flows. Given the significant estimation uncertainty involved in determining the recoverable amount of PP&amp;E, auditing the valuation of the PP&amp;E requires considerable auditor judgment. Our audit approach included that we:</p> <ul style="list-style-type: none"><li>• Performed risk assessment procedures where we considered a significant audit risk for error and/or fraud for the valuation of PP&amp;E of CGU TSIJ resulting from potential management bias. We reviewed the outcome of previous property, plant and equipment impairment assessments and, where applicable, their subsequent re-estimation to assist in identifying and assessing the risks of material misstatement in the current period.</li><li>• Determined whether the fair value less cost of disposal model applied by management was the appropriate model to use and evaluated the discount rates applied, including the impact of climate-related risks and regulatory developments on risk premiums.</li><li>• Independently developed a range estimate and benchmarked management's valuation against peer group market data (e.g. EBITDA multiples).</li></ul>



Key audit matter	Our audit work and observations
	<ul style="list-style-type: none"><li>• Challenged management's key assumptions with a high level of professional skepticism:<ul style="list-style-type: none"><li>◦ We compared expected changes to selling prices and raw material costs, EU steel demand, energy costs including network costs at FY 25 Level to market data.</li><li>◦ Evaluated management's assessment of the continuation of the license to operate for Cokes and Gas Plant 2 (CGP2) until FY 30; the timing and availability of permits required given ongoing scrutiny and orders under penalty from the environmental agency and; ongoing related legal proceedings. We discussed management's assessment with their external legal counsel and obtained external and internal TSN's legal confirmations.</li><li>◦ We challenged management's improvement initiatives through assessing the level of observable support available to substantiate and execute these initiatives.</li><li>◦ We assessed the amount of capital expenditure needed for decarbonisation by obtaining third party supplier information and quotes.</li><li>◦ We compared the changes to EBITDA resulting from producing and selling low carbon steel with external market data and reports.</li><li>◦ Management requested Dutch government support for decarbonising the steel production process, including a national energy infrastructure and requirements for a European level playing field for the steel industry (e.g. Carbon Border Adjustment Mechanism, hereafter CBAM). We challenged management and compared the request for government support to other (observable) government support granted within the European Union.</li><li>◦ We challenged management's assessment and assessed the communication with the (semi)government and its agencies with respect to the permitting and commissioning of new carbon-free production facilities.</li><li>◦ We obtained management's assessment for CBAM effectiveness for reducing the inflow of high carbon steel into the EU market, which is substantiated by market research.</li><li>◦ The post-tax discount rate. We challenged the applied discount rate by comparing the discount rate with market data and peer-analysis.</li></ul></li><li>• We reconciled the inputs to the impairment model with the annual plan FY26 that was approved by the supervisory board.</li><li>• We tested the mathematical accuracy of the calculations in the valuation model.</li></ul> <p>In addition, we assessed the adequacy and sufficiency of management’s disclosure (note 9) highlighting the recoverable amount of EUR 3.4 billion and carrying amount of EUR 2.9 billion, the key assumptions including sensitivities and inherent uncertainties together with the potential impact these might have on the valuation of the property, plant &amp; equipment valuation. In addition, we assessed the accuracy, presentation and disclosure and appropriateness of the sensitivities disclosed in note 9 to the consolidated annual accounts.</p>

Key audit matter	Our audit work and observations
<p><b>Risk of non-compliance with laws and regulations</b></p> <p>The company operates in a highly regulated industry and is subject to extensive environmental laws and regulations, including those governing licenses to operate. During the year, the company has faced increased scrutiny from environmental regulators and heightened media attention regarding its impact on the environment and health. In particular, the Environmental Agency continued to challenge the operations of the Cokes and Gas Plants. This included ongoing investigations into their emissions levels and technical state of assets. From an audit of annual accounts point of view, these investigations raised concerns about the company's ability to retain its operating permits at these plants.</p> <p>Given the significance of these matters and the significant level of uncertainty, we considered the risk of non-compliance with environmental laws and regulations a key audit matter. For our assessment of the risk, we also considered the potential financial and operational consequences, including fines, legal liabilities, reputational damage, and the possible suspension or revocation of operating licenses.</p>	<p>Our audit procedures included, among others:</p> <ul style="list-style-type: none"><li>• Evaluating the company's processes for monitoring compliance with environmental regulations.</li><li>• Reviewing correspondence with regulatory authorities and (external) legal counsel regarding ongoing investigations and permit renewals.</li><li>• We discussed legal proceedings with both external and internal legal counsel and obtained lawyers' letters.</li><li>• Assessing the adequacy of provisions and disclosures related to environmental matters and liabilities in the annual accounts.</li></ul> <p>We also considered the impact of these matters on the company's going concern assessment (e.g. we involved our internal specialists with legal expertise. to assess the length of certain legal proceedings), impairment testing and the adequacy of related disclosures in the annual accounts.</p> <p>We assessed the adequacy and sufficiency of the company's disclosures in the annual accounts related to the risk of non-compliance, provisions and contingent liabilities.</p>

## Report on the other information included in the annual report

The annual report contains other information. This includes all information in the annual report in addition to the annual accounts and our auditor's report thereon.

Based on the procedures performed as set out below, we conclude that the other information:

- is consistent with the annual accounts and does not contain material misstatements; and
- contains all the information regarding the directors' report and the other information that is required by Part 9 of Book 2 of the Dutch Civil Code.

We have read the other information. Based on our knowledge and the understanding obtained in our audit of the annual accounts or otherwise, we have considered whether the other information contains material misstatements.

By performing our procedures, we comply with the requirements of Part 9 of Book 2 of the Dutch Civil Code and the Dutch Standard 720. The scope of such procedures was substantially less than the scope of those procedures performed in our audit of the annual accounts.

The board of management is responsible for the preparation of the other information, including the directors' report and the other information in accordance with Part 9 of Book 2 of the Dutch Civil Code.

## Responsibilities for the annual accounts and the audit

### Responsibilities of the board of management and the supervisory board for the annual accounts

The board of management is responsible for:

- the preparation and fair presentation of the annual accounts in accordance with IFRS Accounting Standards as adopted by the EU and Part 9 of Book 2 of the Dutch Civil Code; and for
- such internal control as the board of management determines is necessary to enable the preparation of the annual accounts that are free from material misstatement, whether due to fraud or error.

In preparing the annual accounts, the board of management is responsible for assessing the Company's ability to continue as a going concern. Based on the financial reporting frameworks mentioned, the board of management should prepare the annual accounts using the going-concern basis of accounting unless the board of management either intends to liquidate the Company or to cease operations or has no realistic alternative but to do so. The board of management should disclose in the annual accounts any event and circumstances that may cast significant doubt on the Company's ability to continue as a going concern.

The supervisory board is responsible for overseeing the Company's financial reporting process.

### Our responsibilities for the audit of the annual accounts

Our responsibility is to plan and perform an audit engagement in a manner that allows us to obtain sufficient and appropriate audit evidence to provide a basis for our opinion. Our objectives are to obtain reasonable assurance about whether the annual accounts as a whole are free from material misstatement, whether due to fraud or error and to issue an auditor's report that includes our opinion. Reasonable assurance is a high but not absolute level of assurance, and is not a guarantee that an audit conducted in accordance with the Dutch Standards on Auditing will always detect a material misstatement when it exists. Misstatements may arise due to fraud or error. They are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the annual accounts.

Materiality affects the nature, timing and extent of our audit procedures and the evaluation of the effect of identified misstatements on our opinion.





A more detailed description of our responsibilities is set out in the appendix to our report.

Amsterdam, 25 July 2025  
PricewaterhouseCoopers Accountants N.V.

Original has been signed by:  
E. M. W. H. van der Vleuten RA MSc



# Appendix to our auditor’s report on the annual accounts 2024/2025 of Tata Steel Nederland B.V.

In addition to what is included in our auditor’s report, we have further set out in this appendix our responsibilities for the audit of the annual accounts and explained what an audit involves.

## The auditor’s responsibilities for the audit of the annual accounts

We have exercised professional judgement and have maintained professional scepticism throughout the audit in accordance with Dutch Standards on Auditing, ethical requirements and independence requirements. Our audit consisted, among other things of the following:

- Identifying and assessing the risks of material misstatement of the annual accounts, whether due to fraud or error, designing and performing audit procedures responsive to those risks, and obtaining audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the intentional override of internal control.
- Obtaining an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company’s internal control.
- Evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the board of management.
- Concluding on the appropriateness of the board of management’s use of the going-concern basis of accounting, and based on the audit evidence obtained, concluding whether a material uncertainty exists related to events and/or conditions that may cast significant doubt on the Company’s ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor’s report to the related disclosures in the annual accounts or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor’s report and are made in the context of our opinion on the annual accounts as a whole. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluating the overall presentation, structure and content of the annual accounts, including the disclosures, and evaluating whether the annual accounts represent the underlying transactions and events in a manner that achieves fair presentation.

We are responsible for planning and performing the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the group as a basis for forming an opinion on the annual accounts. We are also responsible for the direction, supervision and review of the audit work performed for purposes of the group audit. We remain solely responsible for our audit opinion.



We communicate with the supervisory board regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

From the matters communicated with the supervisory board, we determine those matters that were of most significance in the audit of the annual accounts of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

# Abbreviations and glossary

<b>AC</b>	Audit Committee
<b>BoM</b>	Board of Management
<b>BREF</b>	Best Available Techniques Reference Document
<b>CBAM</b>	Carbon Border Adjustment Mechanism
<b>CCS</b>	carbon capture and storage
<b>CEO</b>	Chief Executive Officer
<b>CFO</b>	Chief Financial Officer
<b>CGP</b>	cokes and gas plant
<b>CLA</b>	collective labour agreement
<b>COD</b>	chemical oxygen demand
<b>COO</b>	Chief Operations Officer
<b>CO<sub>2</sub></b>	carbon dioxide
<b>CSRD</b>	Corporate Sustainability Reporting Directive
<b>CY</b>	calendar year (1 January to 31 December)
<b>DMA</b>	double materiality assessment
<b>DNV GL</b>	Det Norske Veritas and Germanischer Lloyd
<b>DRI</b>	direct reduced iron
<b>DRP</b>	direct reduction plant
<b>DSP</b>	direct sheet plant
<b>EA</b>	Environmental Agency
<b>EAF</b>	electric arc furnace
<b>EEA</b>	European Economic Area
<b>EIA</b>	environmental impact assessment
<b>ENB</b>	Energiebedrijf
<b>EPD</b>	Environmental Product Declaration
<b>ESG</b>	environment, social and governance
<b>ESRS</b>	European Sustainability Reporting Standards
<b>ETS</b>	Emission Trading System
<b>EU</b>	European Union
<b>EU-PRTR</b>	European Pollutant Release and Transfer Register
<b>EUROFER</b>	European Steel Association
<b>e-MJV</b>	elektronisch-Milieujaarverslag (Electronic Environmental Annual Report)
<b>FTE</b>	full-time equivalent
<b>FW</b>	Foundation Frisse Wind.nl
<b>FY</b>	financial year (for TSN, 1 April to 31 March)
<b>GBFS</b>	granulated blast furnace slag
<b>GER</b>	Health Effect Report
<b>GGD</b>	Gemeentelijke Gezondheidsdienst (Public Health Service)
<b>GHG</b>	greenhouse gas
<b>GJ</b>	gigajoules
<b>GWh</b>	gigawatt-hour
<b>HIA</b>	Health Impact Assessment
<b>HIRA</b>	Hazard Identification and Risk Assessments
<b>HR</b>	human resources
<b>HSM</b>	hot strip mill
<b>HVO</b>	hydrotreated vegetable oil
<b>I&amp;AP</b>	Integrity & Asset Protection

<b>IPCC</b>	Intergovernmental Panel on Climate Change
<b>IRBC</b>	International Responsible Business Conduct
<b>ISO</b>	International Organization for Standardization
<b>IT</b>	information technology
<b>JLoI</b>	Joint Letter of Intent
<b>KPI</b>	key performance indicator
<b>kWh</b>	kilowatt-hour
<b>LCA</b>	life-cycle assessment
<b>LEAP</b>	Listen, Emphasize, Agree, Partner
<b>LTi</b>	lost-time injury
<b>LTIF</b>	lost-time injury frequency
<b>MAT</b>	Maturity Assessment Tool
<b>MBO</b>	Middelbaar Beroepsonderwijs (secondary vocational education)
<b>MD</b>	Managing Director
<b>MoU</b>	Memorandum of Understanding
<b>NGO</b>	non-governmental organisation
<b>NOx</b>	nitrogen oxide
<b>NZKG</b>	Noordzeekanaalgebied (North Sea Canal Area)
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>PAH</b>	polycyclic aromatic hydrocarbon
<b>PJ</b>	petajoules
<b>QHSE</b>	quality, health, safety and environment
<b>R&amp;D</b>	research and development
<b>RCF</b>	Revolving Credit Facility
<b>RCS</b>	Risk Culture Survey
<b>REACH</b>	Registration, Evaluation, Authorisation and Restriction of Chemicals (EU)
<b>RIVM</b>	Rijksinstituut voor Volksgezondheid en Milieu (National Institute for Public Health and the Environment)
<b>Roadmap</b>	A package of measures to reduce emissions and the nuisance experienced by residents
<b>SB</b>	Supervisory Board
<b>SO<sub>2</sub></b>	sulphur dioxide
<b>SOx</b>	sulphur oxide
<b>TCCT</b>	trivalent chromium-coating technology
<b>TSDE</b>	Tata Steel Downstream Europe
<b>TSIJ</b>	Tata Steel IJmuiden
<b>TSL</b>	Tata Steel Limited
<b>TSN</b>	Tata Steel Nederland
<b>TWh</b>	terawatt-hour
<b>UN</b>	United Nations
<b>USA</b>	United States of America
<b>VEMW</b>	Vereniging voor Energie, Milieu en Water (Royal Association for Energy, Environment and Water)
<b>WSA</b>	World Steel Association
<b>WWF</b>	World Wide Fund for Nature
<b>Zeremis</b>	Stands for ‘zero emissions’. Brand name for low-CO <sub>2</sub> steel propositions

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