

# CONSOLIDATED SUSTAINABILITY STATEMENT

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# GENERAL INFORMATION

## ESRS 2

### BASIS FOR PREPARATION

#### BP-1 – General basis for preparation of sustainability statements

This report is a consolidated sustainability statement in accordance with Section 267a of the Austrian Business Code (*Unternehmensgesetzbuch – UGB*), as amended, as part of the Group Management Report. This statement has been prepared in accordance with European Sustainability Reporting Standards (ESRS). The Sustainability Reporting Act (*Nachhaltigkeitsberichtsgesetz – NaBeG*) has been in force in Austria since February 2026, implementing Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive, CSRD) as regards corporate sustainability reporting. In the following text, the consolidated sustainability statement is referred to as the sustainability report. The disclosed information regarding the EU Taxonomy is in accordance with Regulation (EU) 2020/852, as well as the current delegated regulations and supporting materials.

voestalpine AG is the reporting organization. Unless otherwise stated, the information, figures, and facts published in this report refer to all fully consolidated companies within the voestalpine Group. Both the financial performance indicators and the employee data encompass all of the Group's consolidated entities.

The scope of consolidation for the financial reporting is consistent with the present sustainability reporting and forms the corresponding basis for the sustainability report. When the sustainability report was prepared, the approaches and characteristics of the subsidiaries were taken into account as part of the materiality assessment.

If material impacts, risks, and opportunities (IROs) associated with controlled entities not included in the Consolidated Financial Statements are identified at a later stage, they will be included in the scope of the sustainability report if it is appropriate and feasible to incorporate them.

Impacts along the value chain that occur outside of voestalpine's factory gates but are subject to its sphere of influence are regularly evaluated as part of supply chain management and are managed

with an eye toward sustainability. The process of the double materiality assessment described in IRO-1 also took into account impacts, risks, and opportunities along both the upstream and downstream value chain of voestalpine. The sections on topic-specific information describe the extent to which voestalpine's policies, actions, targets, and metrics are applied across the value chain.

voestalpine's business policy is based on the principle of transparency. For this reason, the option to exclude certain information from disclosure (see ESRS 1 Section 7.7) has not been exercised in this sustainability report. This report includes all relevant information; nothing has been withheld on the grounds of confidentiality, including details related to intellectual property, proprietary know-how, or innovation outcomes.

Additionally, voestalpine has fully disclosed all forthcoming developments and matters currently under negotiation.

#### **BP-2 – Disclosures in relation to specific circumstances**

In this report, no external validation of the metrics has been carried out, apart from the metrics in subsections E1-6 and E5-5. This sustainability report also includes information related to the EU Taxonomy. This information is provided in the section on environmental information in the chapter "Disclosures required by the EU Taxonomy Regulation."

The reporting time horizons used by voestalpine are in line with ESRS recommendations. The periods referred to in the sustainability report are as follows:

- » short-term: reporting period of one business year
- » medium-term: period from the end of the short-term horizon up to five years
- » long-term: period from the end of the medium-term horizon up to ten years
- » long-term (extended): more than 10 years

In addition to the periods specified by ESRSs, the long-term period has been further divided into the two categorizations listed below. The reason for this is that sector or company-specific risks and opportunities often become relevant only further in the future, beyond the ten-year horizon.

## VALUE CHAIN ESTIMATION

As part of the sustainability report, estimates are used to derive metrics for the upstream and downstream value chains, where direct measurements or primary data are not available.

This primarily concerns the greenhouse gas balance, specifically the indirect emissions from the upstream and downstream value chains, which are classified under Scope 3 categories according to the Greenhouse Gas Protocol. Specifically, these categories are:

- » **Scope 3 – Category 1:**  
Purchased goods and services
- » **Scope 3 – Category 3:**  
Fuel- and energy-related activities
- » **Scope 3 – Category 4:**  
Upstream transportation and distribution
- » **Scope 3 – Category 5:**  
Waste generated in operations
- » **Scope 3 – Category 9:**  
Downstream transportation and distribution

At present, external emissions databases are primarily used to calculate these emissions. The databases are based on market data as well as average company data, and are regularly updated. For instance, sector data from industry associations like EUROFER or worldsteel are utilized by this provider to regularly update the databases for the iron and steel sector. The secondary data used is based on average actual consumption and offers a reliable foundation with sufficient accuracy in greenhouse gas accounting.

At the same time, voestalpine is in direct discussions with suppliers to obtain access to primary data. The focus is on products that significantly impact the Group's indirect greenhouse gas footprint. To further improve the accuracy of these estimates, enhanced measures in supplier engagement are planned to increase the share of primary data. In addition, new emissions databases are continuously evaluated, and, where necessary, more accurate secondary data are sourced from the system provider. Any potential measurement uncertainties primarily stem from the limited availability of primary data from the upstream value chain. The assumptions, estimates, and assessments that underlie the metrics are primarily based on market, industry, and average data.

## SOURCES OF ESTIMATION AND OUTCOME UNCERTAINTY

A certain degree of measurement uncertainty exists for individual parameters, particularly in high-volume measurements related to water and wastewater, as well as in the estimated costs of future environmental regulations. In order to verify the data set, which is partly based on projections for environmental and GHG metrics, a backtest was carried out using actual data from the previous year. The estimation methods used were found to be appropriate.

Information on measurement uncertainties and assumptions can be found in the respective topic-specific sections.

## **CHANGES IN PREPARATION OR PRESENTATION OF SUSTAINABILITY INFORMATION**

The methodology for presenting the coverage of key production sites by a certified management system for occupational health and safety was adjusted in the reporting year. In the previous business year, the metric referred to the proportion of certified companies and not to the employees actually covered by the management systems.

In this year's report, the benchmark for the metric has been adjusted to meet ESRS requirements. Reporting now takes place at the employee level at material sites that are certified to ISO 45001 or an equivalent national standard.

It is not practical to retroactively adjust the comparative figures of previous reporting periods.

The difference is mainly a result of the change in methodology, which includes characteristics (e.g., employee numbers) that may change over time.

The calculation methodology for the gender pay gap has been revised to meet ESRS requirements. Average gross hourly earnings were calculated for the first time this year not at company level, but at Group level as a whole, thus avoiding an unequal weighting of the target hours.

## **REPORTING ERRORS IN PRIOR PERIODS**

In the last reporting year, Scope 3 category 3.2 was reported in the E1-6 GHG emissions table but not taken into account. The totals have been corrected.

As a result of the abovementioned revision to the GHG emissions table, the figures for the 2024/25 business year have been revised in the GHG Intensity per net revenue table (see also E1-6).

In the last reporting year, the pollutant parameter total phosphorus was overstated (see also E2-4). A subsequent correction was possible, as a result of which the figure fell below the threshold required under Regulation (EC) No 166/2006. This emission is therefore no longer reported.

Based on occasional follow-up reports on pollutant monitoring, certain parameters for emissions to air and water were adjusted for the 2024/25 business year, and more detail was provided in the emissions overview table (see E2-4).

## INCORPORATION BY REFERENCE

Please find a list of ESRS disclosure requirements that have been referenced in the report below:

Chapter	Datapoints	Reference document	Chapter in reference document
GOV-1 – The role of the administrative, management, and supervisory bodies	ESRS 2-GOV-1 21c ESRS 2-GOV-1 23 ESRS 2-GOV-1 21a GOV-1 G1 5a GOV-1 G1 5b	Consolidated Corporate Governance Report 2025/26	Composition of the Management Board/ Composition of the Supervisory Board
GOV-3 – Integration of sustainability-related performance in incentive schemes	ESRS 2-GOV-3 29 ESRS 2-GOV-3 29a ESRS 2-GOV-3 29b ESRS 2-GOV-3 29c ESRS 2-GOV-3 29d ESRS 2-GOV-3 29e GOV-3 E1 13	Compensation Report for members of the Management and Supervisory Board business year 2025/26	Remuneration of the Management Board Remuneration of the Supervisory Board

## GOVERNANCE

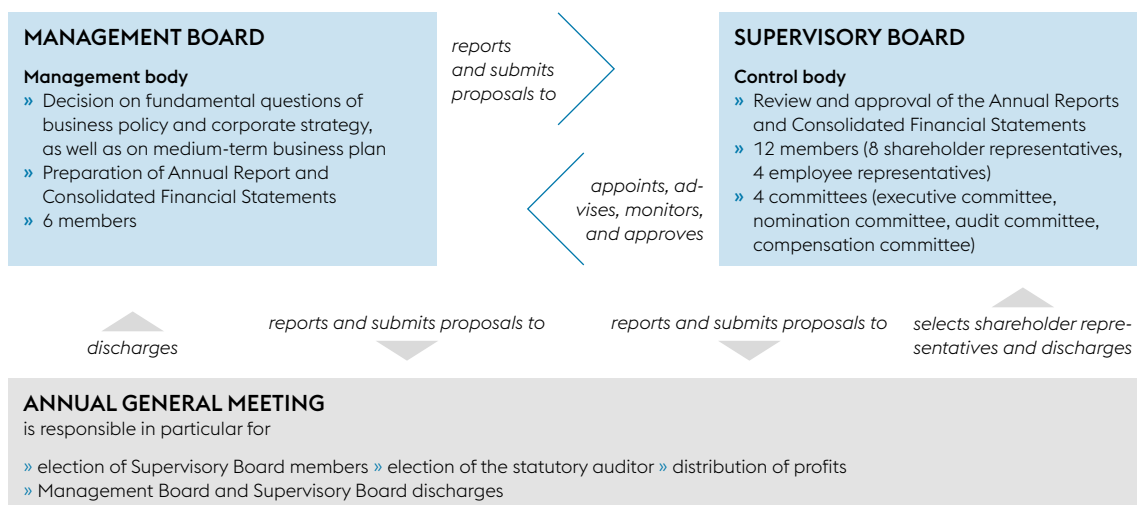
### GOV-1 – The role of the administrative, management, and supervisory bodies

#### GOV-1 – GENERAL INFORMATION

The governance structure of voestalpine AG is based on a dual management model. This model includes the Management Board as a management body and the Supervisory Board as a supervisory body. The Management Board takes over the management and representation of the joint stock company and is responsible for the strategic decisions. The Supervisory Board supervises the management of the Management Board and is responsible for the appointment of members of the Management Board. The Articles of Association authorize the Supervisory Board to appoint committees and to define their rights and responsibilities. In addition to the statutory Audit Committee, the Supervisory Board of voestalpine AG has formed a General Committee, a Compensation Committee, and a Nomination Committee from among its members.

The dual management system ensures a clear separation between the company's operational management and the independent oversight of its activities.

## DUAL voestalpine MANAGEMENT SYSTEM

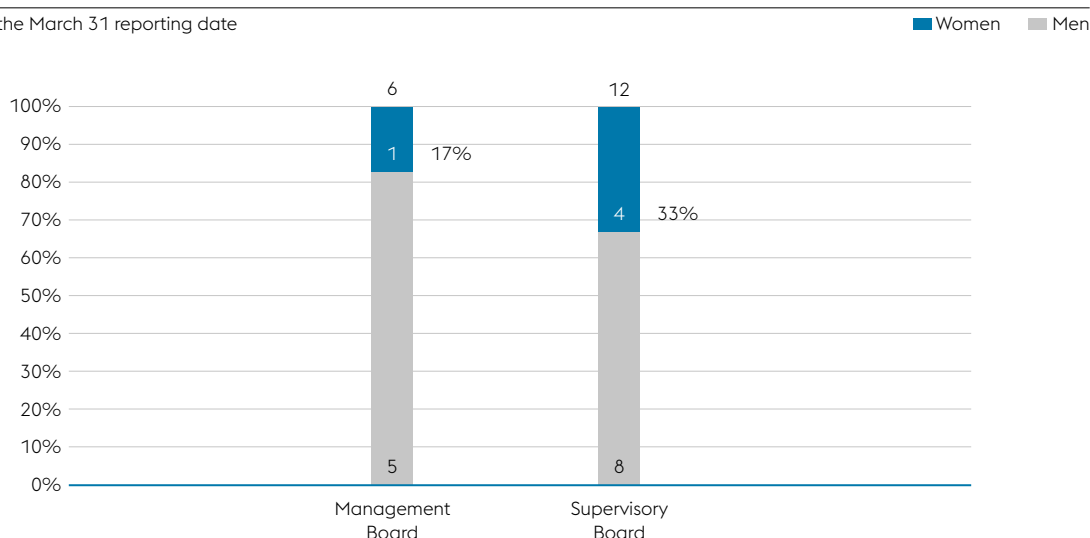


As in the previous year, the Management Board of voestalpine AG consisted of six members as of the reporting date. The percentage of female members was 16.7% while the percentage of male members 83.3%. The ratio of female to male members (gender diversity ratio) is therefore 20% or 1:5. Five Management Board members are Austrian nationals, and one is a German national.

As in the previous year, the Supervisory Board of voestalpine is made up of eight shareholder representatives and four employee representatives. The proportion of women in the Supervisory Board is 33.33%, comprising three shareholder representatives and one employee representative. With the exception of one member who holds Swiss citizenship, all Supervisory Board members are Austrian.

### GENDER STRUCTURE OF THE MANAGEMENT BOARD AND SUPERVISORY BOARD

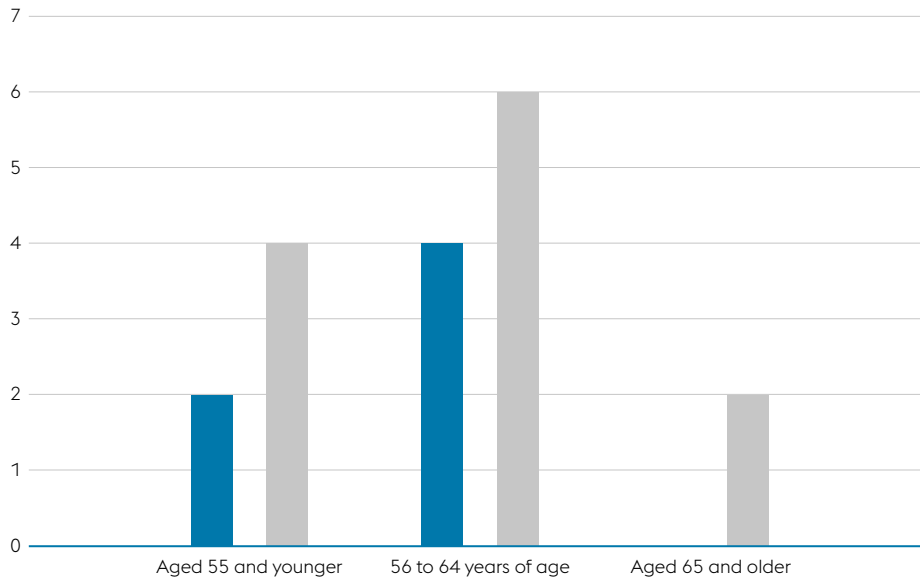
As of the March 31 reporting date



## AGE STRUCTURE OF THE MANAGEMENT BOARD AND SUPERVISORY BOARD

As of the March 31 reporting date

■ Management Board ■ Supervisory Board



Additional information on the composition of the Management Board can be found in the most recent Consolidated Corporate Governance Report 2025/26 (chapter “Composition of the Management Board”).

Additional information regarding the composition of the Supervisory Board, its committees, as well as the number and key topics of meetings in the 2025/26 business year can also be found in the most recent Consolidated Corporate Governance Report 2025/26 (chapter “Composition of the Supervisory Board”). The Supervisory Board possesses a wide range of expertise, professional experience, and management skills, ensuring effective oversight and guidance of the Management Board. This expertise is particularly important in the context of the Corporate Sustainability Reporting Directive (CSRD). An overview of the specific skills and expertise of the Supervisory Board members can be found in the qualifications matrix in the Consolidated Corporate Governance Report 2025/26, in the chapter “Composition of the Supervisory Board.”

The Management Board and the Supervisory Board are regularly informed and trained on relevant topics related to compliance, auditing, and sustainability during Management Board and Supervisory Board meetings. In addition, they may consult internal and external consultants and experts as required to enhance their knowledge on certain subjects. This ensures that the committees consistently possess up-to-date and well-founded expertise on sustainability.

Both the Management Board and the Supervisory Board bring together diverse competencies and experience to effectively address the material impacts, risks, and opportunities.

## **GOV-1 – G1 BUSINESS CONDUCT**

The Code of Corporate Governance provides Austrian stock corporations with a framework for transparent, responsible, and sustainable corporate management and oversight. It is based on the provisions of Austrian stock corporation, stock exchange, and capital market law and is aligned with the OECD Guidelines for Corporate Governance.

The Austrian Code of Corporate Governance was last amended in January 2025. Compliance with the code is voluntary and aims to promote responsible corporate governance focused on sustainable and long-term value creation. Through its voluntary commitment, voestalpine adheres to these principles and promotes a high level of transparency for all stakeholders of the company.

The Management Board and the Supervisory Board of voestalpine AG resolved as early as in 2003 to recognize the Austrian Code of Corporate Governance. Currently, in addition to the mandatory “L Rules,” voestalpine also complies with all “C Rules” and, with the exception of R Rule 40a, all “R Rules” (recommendations) of the Code as amended in January 2025. The Supervisory Board has defined guidelines for its independence in accordance with C Rule 53 of the Austrian Code of Corporate Governance and published them on [www.voestalpine.com](http://www.voestalpine.com) under Investors/Corporate Governance. All members elected by the Annual General Meeting have made a written declaration of their independence in the course of their appointment (C Rule 53 ÖCGK). Accordingly, all elected members of the Supervisory Board (100%, excluding employee representatives)—seven members at the time of their election and one member from August 2024—have declared themselves independent.

## **DUTIES AND RESPONSIBILITIES OF THE MEMBERS OF THE MANAGEMENT BOARD AND SUPERVISORY BOARD IN RELATION TO SUSTAINABILITY**

The Management Board proactively drives progress on sustainability topics and plays a central role in monitoring, managing, and overseeing the impacts, risks, and opportunities. It is informed about sustainability topics during regular board meetings and is involved in monitoring actions, setting new targets, and addressing emerging challenges.

In close coordination with the administrative, management, and supervisory bodies, voestalpine’s sustainability-related goals were defined in terms of material impacts, risks, and opportunities as part of the development of the Group Strategy 2030+ and the associated sustainability strategy. The progress and achievement of the goals is monitored as part of the annual strategy review process.

Strategic responsibility for sustainability within the Management Board lies with the CEO. The corresponding operational tasks are handled by the sustainability organization, led by the Head of Group Sustainability, and by the Corporate Development department. Further information on the composition and tasks of the Group sustainability organization can be found in sections GOV-2 and GOV-5. Regular reports to the Supervisory Board of voestalpine AG enable effective oversight. This oversight also acts as a central control procedure for the management of impacts, risks, and opportunities, and results, for example, in the Group-wide resilience analysis, which assesses the company’s resilience to climate-related risks and opportunities (for more information on the resilience analysis see chapters SBM-3 E1 and IRO-1 E1).

## **GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management, and supervisory bodies**

The CEO is responsible for the sustainability strategy of voestalpine AG, while the member of the Management Board responsible for the Finance division is responsible for risk management. The Group Sustainability department, which was newly created in 2023, acts as a central coordination point for the sustainability strategy. The Management Board receives regular reports from the divisions and business units on key sustainability matters. The reports cover impacts, risks, and opportunities as well as the implementation of the sustainability due diligence. In addition, they include the results and an assessment of the effectiveness of the agreed policies, actions, metrics, and targets.

The Supervisory Board of voestalpine AG oversees the Group's risk management system and sustainability efforts. SBM-3 details the impacts, risks, and opportunities that have been identified as material to voestalpine. The objectives of the sustainability strategy are central to both day-to-day operations and long-term projects.

The material impacts, risks, and opportunities are taken into account by the Management and Supervisory Boards in strategic decisions and significant transactions such as company acquisitions.

In the business year 2025/26, the Supervisory Board and Management Board of voestalpine addressed all material IROs in accordance with SBM-3.

## **GOV-3 – Integration of sustainability-related performance in incentive schemes**

The compensation policy for the Management Board of voestalpine AG defines the framework and principles for compensating Management Board members, implementing the requirements of the Austrian Stock Corporation Act (Sections 78 to 78b of the Austrian Stock Corporation Act [*Aktiengesetz – AktG*]) as well as the Austrian Code of Corporate Governance. The compensation policy currently in effect was prepared by the General Committee, acting in its capacity as the Compensation Committee of voestalpine AG, and was formally approved by the Supervisory Board in its meeting held on June 4, 2024. It was submitted to the 32<sup>nd</sup> Annual General Meeting of the company for a vote on July 3, 2024.

The key principles of the compensation policy, along with detailed information on the compensation of the members of the Management Board and Supervisory Board, are presented in the compensation report for the Management and Supervisory Boards for the business year 2025/26. The report is audited by Deloitte Audit Wirtschaftsprüfungs GmbH and will be submitted for approval to the 34<sup>th</sup> Annual General Meeting of voestalpine AG on July 1, 2026.

Since both the compensation policy and the compensation report will be submitted to the Annual General Meeting for approval, feedback from stakeholders will also be taken into account. The voting results for the compensation report 2025/26 and the compensation policy from the 32<sup>nd</sup> Annual General Meeting of the company held on July 3, 2024, are published on the voestalpine AG website. The compensation system for the Management Board aims to ensure appropriate compensation in relation to the size and financial position of voestalpine AG and to create incentives for long-term successful corporate management. The compensation of the Management Board members consists of a fixed, non-performance-based salary and a variable, performance-based component. The latter is based on a performance agreement concluded at the beginning of the business year between the Management Board and the general committee of the Supervisory Board of the company. The agreement includes both financial targets in the form of quantitative metrics and non-financial qualitative

targets. Care is taken when determining these performance criteria to promote the long-term development of the company and avoid creating incentives for short-term effects only. The design of the quantitative targets over a three-year period ensures that the focus is on sustainable action and long-term corporate development. During the reporting period, non-financial targets included sustainability matters that are not based on performance metrics but are instead of a qualitative nature.

The shareholder representatives on the Supervisory Board receive fixed compensation without any variable components. The compensation of the members of the Supervisory Board is therefore not dependent on the achievement of specific sustainability targets. Members of the Supervisory Board appointed by the employee representatives do not receive Supervisory Board compensation (including attendance fees).

### **GOV-3 – E1 CLIMATE CHANGE**

Climate-related considerations form part of the variable compensation of voestalpine's Management Board. Details regarding the proportion of compensation-relevant climate-related criteria and their formulation are included in the compensation report for voestalpine AG's Management and Supervisory Board members for the business year 2025/26, in the chapter "Compensation of the Management Board."

### **GOV-4 – Statement on due diligence**

voestalpine has implemented governance processes to fulfill its due diligence obligations in order to identify, assess, and take appropriate actions regarding material actual and potential negative impacts of its business activities on people and the environment. This ongoing process extends across the entire value chain, including the company's own operations as well as upstream and downstream relationships with various stakeholder groups.

The due diligence governance processes comprise several successive steps:

#### **1. Identifying and assessing material adverse impacts**

- » The materiality assessment serves as a central tool for identifying and assessing actual and potential adverse impacts on people and the environment.
- » The assessment covers all business units and stages of the value chain and is based on the criteria of "severity of impact" and "likelihood of occurrence," as outlined in international guidelines (UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises).
- » The insights gained are prioritized and serve as the basis for developing prevention and remediation measures.

#### **2. Integrating impacts into the corporate strategy and operational processes**

- » The identified material negative impacts are incorporated into voestalpine's strategic planning processes.
- » They are also integrated into corporate management, governance mechanisms, and internal risk management systems.
- » voestalpine integrates these insights into decisions on investments, business model development, and operational processes, with the goal of minimizing or, where possible, preventing negative impacts.

### **3. Implementing preventive and remedial actions**

- » Development and implementation of specific actions to prevent, mitigate, or remedy negative impacts.
- » Carrying out targeted training programs for employees on human rights and environmental due diligence responsibilities.
- » Periodic supplier assessments, in particular with regard to labor and environmental standards.
- » Promotion of sustainable procurement practices and initiatives to reduce CO<sub>2</sub> emissions in production processes.

### **4. Monitoring and reporting**

- » Regular reviews of the progress and effectiveness of the implemented actions.
- » Documentation of developments and challenges covered in voestalpine's sustainability reports, including both quantitative and qualitative metrics for measuring success.
- » Transparent communications on practices and results of the due diligence, including through reporting, press releases, and by posting on the company's website.

voestalpine follows a continuous improvement process to further optimize its due diligence. The insights gained are incorporated into the further development of the sustainability strategy to effectively counteract negative impacts and ensure long-term responsible business practices. Progress and challenges related to the fulfillment of our due diligence obligations are monitored on a regular basis.

The following table provides an overview of how voestalpine applies the core elements of due diligence for human rights and the environment, and where they are presented in this sustainability report.

## DUE DILIGENCE REFERENCES

Core Elements of Due Diligence	ESRS Disclosure Requirements / References
<b>a) Embedding due diligence in governance, strategy and business model</b>	<p>ESRS 2 GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management, and supervisory bodies</p> <p>ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes</p> <p>ESRS 2 SBM-3 Material impacts, risks, and opportunities and their interaction with strategy and business model</p> <p>Disclosure Requirement related to ESRS 2 SBM-3: Material IROs and their interaction with strategy and business model in relation to E1, E4, S1, S2, and S3</p>
<b>b) Engaging with affected stakeholders in all key steps of the due diligence</b>	<p>ESRS 2 GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management, and supervisory bodies</p> <p>ESRS 2 SBM-2 Interests and views of stakeholders</p> <p>Disclosure Requirement related to ESRS 2 SBM-2: Interests and views of stakeholders in relation to S1, S2, S3</p> <p>ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks, and opportunities</p> <p>Disclosure Requirement related to ESRS 2 IRO-1: Description of the processes to identify and assess material IROs in relation to E1, E2, E3, E4, E5, and G1</p> <p>ESRS 2 MDR-P Policies and procedures for stakeholder engagement in due diligence processes in relation to E1, E2, E3, E4, E5, S1, S2, S3, G1 and I,R&amp;D</p>
<b>c) Identifying and assessing adverse impacts</b>	<p>ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks, and opportunities</p> <p>Disclosure Requirement related to ESRS 2 IRO-1: Description of the processes to identify and assess material IROs in relation to E1, E2, E3, E4, and E5</p> <p>ESRS 2 SBM-3 Material impacts, risks, and opportunities and their interaction with strategy and business model</p> <p>Disclosure Requirement related to ESRS 2 SBM-3: Material IROs and their interaction with the strategy and business model in relation to E1, E4, S1, and S2</p>
<b>d) Taking actions to address those adverse impacts</b>	<p>ESRS 2 MDR-A Actions in relation to E1, E2, E3, E4, E5, S1, and S2, including transition plans to address impacts</p>
<b>e) Tracking the effectiveness of these efforts and communicating</b>	<p>ESRS 2 MDR-M Metrics in relation to E1, E2, E3, E4, E5, S1, and S2</p> <p>ESRS 2 MDR-T Targets in relation to E1, E2, E3, E4, E5, S1, and S2</p>

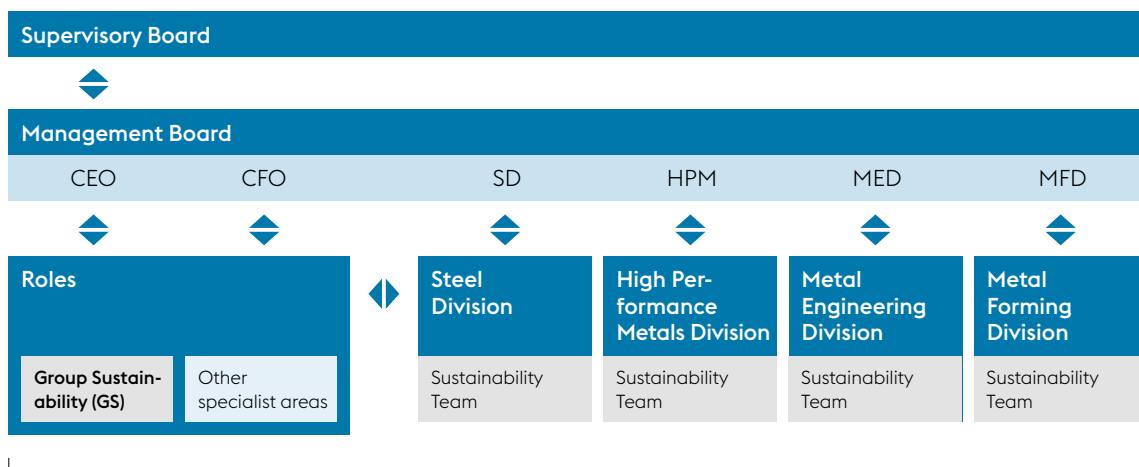
## GOV-5 – Risk management and internal controls over sustainability reporting

### ORGANIZATIONAL ANCHORING OF SUSTAINABILITY AT voestalpine

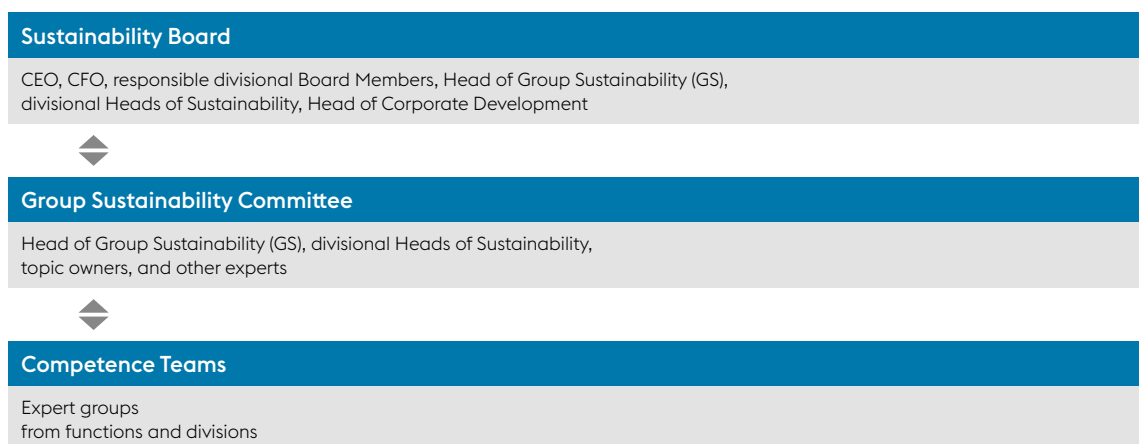
The Group Sustainability department, which was established in 2023, is responsible for and coordinates Corporate Responsibility Management and all sustainability agendas. In addition, a secondary organization was established in the reporting period in the form of a board and committee structure including competence teams from the functions and divisions in order to ensure consistent cross-functional and cross-divisional cooperation at all levels. This structure also includes risk management processes and internal control mechanisms related to sustainability reporting.

### ORGANIZATIONAL STRUCTURE—SUSTAINABILITY MANAGEMENT

#### PRIMARY ORGANIZATION



#### SECONDARY ORGANIZATION



### **Group Sustainability department**

The Group Sustainability (GS) department is responsible for coordinating reporting and regularly updating report content in consultation with the relevant departments and in compliance with legal standards. GS is responsible for implementing an internal control system (ICS) as part of sustainability reporting, insofar as the processes are not already covered by an existing ICS (e.g., ICS for financial processes).

### **Other specialist areas**

#### **» Internal Audit and Risk Management department**

Risk management is responsible for Group-wide risk management as well as for Internal Audit. The ICS for sustainability reporting supplements existing internal control systems (e.g., finance, sales, personnel) at voestalpine. Therefore, responsibility for monitoring the processes lies with the Internal Audit and Risk Management department.

#### **» Specialist departments**

All relevant departments are responsible for the correct and complete provision of the necessary data and information required for sustainability reporting. It is the responsibility of the individual departments to ensure adherence to the respective ICS requirements for sustainability reporting.

In order to meet the requirements for consistent, complete, and reliable sustainability reporting in accordance with ESRS, in the last business year the existing processes were expanded and adapted to the specific requirements of sustainability reporting. The internal control system (ICS) for the voestalpine sustainability reporting is based on the internationally recognized COSO framework (Committee of Sponsoring Organizations of the Treadway Commission – Internal Control – Integrated Framework). This framework is based on the following five key components:

1. Control environment
2. Risk evaluation
3. Control mechanisms
4. Information and communication
5. Monitoring

### **Control environment**

The sustainability reporting processes are embedded within the overarching risk management structures, including internal control systems. The numerous Group policies, published on the intranet, define Group-wide minimum standards and provide the framework for ethical, responsible, and sustainable business conduct. They include basic ICS principles such as:

- » The dual control principle
- » Functional separation
- » Transparency and traceability
- » Need-to-know principle
- » Security of property and assets

At voestalpine, risk management and internal control mechanisms are designed to identify, assess, and mitigate the risks that may affect the Group's financial and sustainability reporting. The voestalpine ICS comprises guidelines, procedures, and controls which are regularly reviewed and updated in order to be able to respond adequately to new risks, taking into account regulatory requirements.

With regard to sustainability reporting, the identification of reporting-related risk sources and effective control mechanisms was further expanded in business year 2025/26.

### **Risk evaluation**

Sustainability reporting is subject to risks, such as human error, incomplete data (bases), or inconsistent information. Risks relate in particular to the accuracy of data entries and manual processing steps in the reporting process. This also includes risks of incomplete or late data reporting, potential errors due to manual calculation steps, and deviations that can result from heterogeneous system landscapes.

In certain areas, such as biodiversity, there was limited reliable information available at the time of the IRO-1 – E4 assessment to accurately assess concrete impacts as well as financial risks and opportunities. voestalpine is working to systematically develop its competencies and the underlying data base in these areas.

### **Control mechanisms**

voestalpine has implemented a series of control mechanisms to minimize the sustainability reporting risks identified in the risk evaluation to the greatest possible extent:

The CSRD project core team regularly reviews the requirements for sustainability reporting and the regulations during the reporting process. The collection of quantitative data is mainly carried out by standardized queries or IT systems including (automated) input checks, release notes, and subsequent plausibility checks. These controls are complemented by system-based access controls and automated input controls in the IT systems used for sustainability reporting. Internal experts from a wide range of specialist departments examine the topic-specific chapters, carry out cross-comparisons with other chapters (dual control principle), and review or validate subject-specific content. The Group Sustainability Committee reviews and subsequently approves the material intended for publication. In areas where data is incomplete—such as biodiversity—voestalpine systematically documents any information gaps. These then serve as the basis for the further development of the materiality assessment and reporting in future reporting periods. Central Group functions are integrated into the implementation of individual quantitative and qualitative audit mechanisms, and the Group-wide Sustainability Board is also involved.

In addition, the sustainability report is subject to an external audit with limited assurance. The appointed auditors conduct analytical audit procedures and conduct sample audits as part of the limited assurance process for the company's sustainability report. Audit activities performed by the external auditor are described in the assurance report.

Accordingly, voestalpine has preventive and detective control measures in place in relation to the production of qualitative and quantitative report content. Preventive measures include, in particular, standardized data collection templates and defined term classifications, system-side validation and automated input checks, as well as ensuring appropriate access and authorization structures in the IT systems used. Detective control activities include specialist and technical plausibility checks, deviation analyses, sample-based test procedures and formalized dual control approval processes. The proper implementation of these checks is already verified and documented in many areas by system logs, storage systems, and/or defined storage structures.

### **Information and communication**

The responsibilities in the entire process (see organizational structure for sustainability management) are clearly defined. A reporting calendar with milestones and dependencies for financial reporting as well as Group-wide, written requirements for data collection and documentation in the form of a handbook are in place to ensure the timely dissemination of information and complete reporting. In addition, the results of the risk assessment and the internal control mechanisms related to sustainability reporting are regularly communicated to the relevant institutions. This includes reporting to the Management Board and providing additional information to the Internal Audit and Risk Management departments to ensure transparent monitoring and continuous improvement.

### **Monitoring**

The aim is to ensure the monitoring of the reporting process by combining structured process design with clearly defined responsibilities and a multi-layered control framework. Control actions, including ongoing plausibility checks, documented controls in some areas, as well as periodic reviews of process effectiveness—such as internal checks and audits—are designed to ensure that the sustainability reporting meets regulatory requirements and that data quality, transparency and traceability are high.

## **STRATEGY**

### **SBM-1 – Strategy, business model, and value chain**

voestalpine is a global steel and technology group with a unique combination of material and processing expertise. The Group's organizational structure consists of a holding company and four divisions. With high-quality product and system solutions made from steel and other metallic materials, voestalpine is a leading partner in the automotive, energy, mechanical engineering, consumer goods, and aerospace industries. In addition, voestalpine is the world market leader in rail infrastructure systems, high-quality tool steel, and special sections. voestalpine does not offer products or services that are subject to bans in the respective markets. The Group's broad customer base contributes to earnings stability in a cyclical market environment overall.

The Steel Division has been setting environmental benchmarks in steel production for years and is developing hydrogen-based future technologies to achieve low-emission steel production. With its high-quality strip steel, the Steel Division is a partner to renowned automotive manufacturers and suppliers around the globe.

The High Performance Metals Division is a global leader in the production and downstream processing of metallic high-performance materials, particularly high-speed steel and other specialty steels, as well as titanium and nickel-based alloys. Customers of these products include, for example, suppliers to the automotive and consumer goods industries, the special machinery sector, as well as the aerospace industry. Following the sale of Buderus Edelstahl in Wetzlar (Germany) in the business year 2024/25, site consolidations outside Austria, capacity adjustments at voestalpine BÖHLER Bleche in Mürzzuschlag (Austria), and the sale of voestalpine BÖHLER Profil, the High Performance Metals Division has largely completed the process of restructuring its portfolio.

The Metal Engineering Division, with its Railway Systems business segment, is a global leader in providing integrated track systems. It provides customized comprehensive solutions for all rail infrastructure segments—from urban and mixed traffic to heavy freight and high-speed networks. Through its Industrial Systems business unit, the division is also the European market leader in high-quality wire and complete welding solutions. As part of the greentec steel program, the Metal Engineering Division is also intensively working on and researching various innovations, climate-friendly technologies, and production processes.

The Metal Forming Division is the center of expertise for highly advanced profile, tube, and precision strip steel products, as well as for ready-to-install system components made from pressed, stamped, and roll-formed parts. These products are used in a wide range of industries.

## REVENUE BY REGION

	2024/25		2025/26	
	Total	in %	Total	in %
European Union (excluding Austria)	8,969.3	57%	8,784.5	58%
Austria	1,083.2	7%	1,074.4	7%
USMCA	2,192.1	14%	2,078.9	14%
Asia	1,430.5	9%	1,193.5	8%
South America	528.0	3%	447.3	3%
Rest of World	1,540.6	10%	1,484.5	10%
<b>Total revenue by region</b>	<b>15,743.7</b>	<b>100%</b>	<b>15,063.1</b>	<b>100%</b>

In millions of euros

## REVENUE BY DIVISION

	2024/25		2025/26	
	Total	in %	Total	in %
Steel Division	5,799.1	37%	5,730.6	38%
High Performance Metals Division	3,182.2	20%	2,749.7	18%
Metal Engineering Division	4,167.9	27%	4,054.7	27%
Metal Forming Division	3,125.1	20%	3,030.1	20%
Holding & Group Services	1,012.4	6%	944.2	6%
Consolidation	-1,543.0	-10%	-1,446.2	-9%
<b>Total Group</b>	<b>15,743.7</b>	<b>100%</b>	<b>15,063.1</b>	<b>100%</b>

In millions of euros

## REVENUE BY INDUSTRY

	2024/25		2025/26	
	Total	in %	Total	in %
Automotive	4,772.2	30%	4,560.7	30%
Energy	2,711.7	17%	2,413.1	16%
Railway systems	2,266.2	15%	2,211.0	15%
Construction	1,503.6	10%	1,480.9	10%
Mechanical engineering	1,280.7	8%	1,189.5	8%
White goods/Consumer goods	651.2	4%	624.2	4%
Aerospace	543.4	3%	603.3	4%
Other	2,014.7	13%	1,980.4	13%
<b>Total revenue by industry</b>	<b>15,743.7</b>	<b>100%</b>	<b>15,063.1</b>	<b>100%</b>

In millions of euros

voestalpine comprises about 500 Group companies and sites in over 50 countries on five continents. As of the reporting date (March 31, 2026), the voestalpine Group had a global workforce of 48,010 employees (2024/25: 49,298) (including apprentices). 50.1% (2024/25: 49.3%) of the employees are based in Austria, while 49.9% (2024/25: 50.7%) work at sites outside Austria.

## EMPLOYEES BY REGION

In each case as of the March 31 reporting date

	2024/25		2025/26	
	Total	in %	Total	in %
European Union (excluding Austria)	13,732	29%	13,211	28%
Austria	24,323	49%	24,039	50%
USMCA	3,388	7%	3,220	7%
Asia	3,190	6%	3,121	6%
South America	2,694	5%	2,530	5%
Rest of World	1,971	4%	1,889	4%
<b>Total employees</b>	<b>49,298</b>	<b>100%</b>	<b>48,010</b>	<b>100%</b>

The Group Strategy 2030+ sets the course for voestalpine for the years ahead and is our answer to the challenges and opportunities arising from a dynamic, constantly changing environment. The fundamental core objectives of our strategy are sustainable, value-enhancing growth in the attractive fields of the further processing of steel and metallic materials as well as long-term sustainability and the Group's resilience.

According to the guiding principle, "We are shaping a better, safer and more sustainable future," as a steel and technology Group, we have set ourselves the objective of being an economic leader, with sustainable, innovative product and system solutions made of high-quality steel and high-performance materials. We use our unique blend of materials and processing expertise to create innovative solutions that give our customers a real competitive advantage. The decentralized, divisional organizational structure of voestalpine increases the customer proximity, speed, flexibility, and adaptability of our specialized business segments, while the broad diversification across segments, regions, and products ensures additional stability. Networking and leveraging synergies between the business segments create added value in the Group. In addition, our stable ownership structure leads to strategic independence in the interest of all stakeholders. In line with our overarching strategic objective of adding value and thus increasing the value of the Group, focused growth in attractive, high-yield sectors such as rail infrastructure, aerospace, special profiles, and warehouse technology is an essential strategic pillar. We are further developing our product portfolio with innovative solutions, strengthening the factors that set us apart in our core markets and focusing on further targeted internationalization in growth markets and regions.

Active and consistent management of our portfolio, focusing on efficiency in all areas and strengthening the competitiveness of our (production) sites as well as the reorganization of low-return business units, also ensures the sustainability and resilience of the Group and thus constitutes the second essential pillar of our strategy. The economically successful decarbonization of blast furnace-based steel production with the clear target of achieving net-zero emissions by 2050 and the further development and expansion of the circular economy is the third essential pillar of our strategy. As an international Group, voestalpine is committed to the global climate targets and is working intensively on technologies to reduce GHG emissions as well as on long-term decarbonization.

## **SUSTAINABILITY STRATEGY AND TARGETS**

The sustainability strategy of voestalpine forms an integral part of the Group's corporate strategy and is operationalized within the individual divisional, business unit, and functional strategies. With its comprehensive sustainability strategy, voestalpine pursues an integrated approach and has formulated strategic principles and targets for each sphere of action. The sustainability strategy is based on the three pillars of the business & ethical corporate governance, a commitment to climate action & environmental protection, and employees & society.

As part of stakeholder management, voestalpine communicates its policy and related progress both internally and externally. For this purpose, voestalpine maintains contact with all relevant stakeholders by engaging in a responsible, solution-oriented, and transparent dialogue with them. This is facilitated through numerous platforms such as professional discussions, roundtables, conferences, and trade shows, as well as analyst and investor meetings. In line with its Code of Conduct, voestalpine actively participates in a wide variety of bodies serving advocacy groups, trade associations, and lobbying campaigns. For more information on stakeholder management, please refer to SBM-2. More information on stakeholder management is provided in section SBM-2. The Group Sustainability department, which was newly created in 2023, acts as the central coordination point for the implementation and further development of the sustainability strategy.

SUSTAINABILITY STRATEGY—STRATEGIC SPHERES OF ACTION



Faced with increasing pressure to reduce GHG emissions and the need to curb climate change, steel producers must find alternative methods to achieve more environmentally friendly production. voestalpine is investing in hydrogen-based and pioneering technologies to enable low-emission production.

voestalpine is committed to clear sustainability goals and has net-zero emissions by 2050. Within the scope of the Science Based Targets initiative (SBTi), the voestalpine Group is committed to reducing total Scope 1 and Scope 2 emissions by 30% and Scope 3 emissions by 25% by 2029 compared to the reference year 2019. This planned reduction corresponds to a “well below 2 °C” scenario. This target was set at the Group level and relates to the gradual decarbonization of the production sites. The target has not been rolled out for customer groups, specific products or regions. Achievement of the target is also subject to external factors and influencing variables, such as the availability of raw materials and renewable energy as well as the economic situation. For more information, see chapter E1.

In order to meet the challenge of decarbonizing steel production while maintaining cost-effectiveness and competitiveness, and achieve the net-zero target by 2050, voestalpine has developed the ambitious greentec steel climate protection program as a core element of the Group and sustainability strategy. Blast furnace-based steel production in the Steel Division and the Metal Engineering Division will be gradually decarbonized by 2050.

In the first phase, EUR 1.5 billion is already being invested in one green-powered electric arc furnace in Linz and one green-powered electric arc furnace system in Donawitz to replace one blast furnace at each location. The materials used involve a mix of scrap, liquid pig iron, and hot briquetted iron (HBI), with the mix adjusted according to the specific quality requirements. These electric arc furnaces, which are already under construction, will go into operation in 2027 and significantly reduce Scope 1 and Scope 2 CO<sub>2</sub> emissions by a total of 30% by 2029 by increasing the use of electricity instead of coal and coke. This represents almost 5% of Austria's entire annual CO<sub>2</sub> emissions, making greentec steel the country's largest climate protection program.

Further information about the greentec steel climate protection program is provided in chapter E1 and I,R&D.

Other challenges for voestalpine in the context of climate change lie in securing the necessary raw materials and energy sources, demand for which will change as steel production is transformed. In order to address these challenges, voestalpine has set itself the strategic objectives of economically securing the supply of the production sites with the required raw materials and energy in the long term, as well as further expanding the circular economy and increasing the use of scrap as a secondary raw material in steel production by 50% by 2030. These packages of actions are already being implemented and will continue to be developed. For more information, see chapters E1 and E5.

Another strategic challenge for voestalpine in the context of sustainability is to continue to attract and retain qualified and motivated employees in line with its requirements as the basis for economic success. To this end, voestalpine relies on various policies and actions—based on its already high level of commitment and above-average employee retention. For more information, see chapter S1.

In addition, the health of employees and the ongoing assurance and enhancement of occupational safety are core values at voestalpine and are given top priority. Continuous efforts are therefore being made to further reduce the frequency of accidents and increase the health index in order to move closer to the vision of “zero accidents.” Strategically, the accident frequency rate is to be reduced by 5.5% by 2030. Group-wide safety standards form the basis of a successful corporate culture rooted in health and safety. For more information, see chapter S1.

Moreover, voestalpine addresses sustainability in its supply chain and works to counter the material negative impacts identified. For more information, see below and chapter S2.

## VALUE CHAIN AND BUSINESS MODEL

At the heart of voestalpine's business model is the efficient production and processing of high-quality steel products and other high-performance metallic materials for applications subject to high quality and technology requirements, while adhering to stringent sustainability standards throughout the entire value chain. This covers the mining of raw materials, production, use, and recycling of products. The following figure illustrates voestalpine's comprehensive value chain in consideration of upstream value added, in-house activities, and downstream value added.

In the upstream value chain, voestalpine relies on essential raw materials such as iron ore, various alloys, steel scrap, coal, and coke, which are sourced from North America, South America, Europe, Africa, Australia, and parts of Asia. In the course of the transition to low-emission production, demand for raw materials is changing in response to technological transformation. For example, in addition to the gradual reduction in the use of coal and coke, the strategic increase in the use of recycled steel scrap reduces the need for iron ore. This recycled scrap comes from both industrial and post-consumer sources.

In addition to the raw materials, the supply of energy, which is provided by regional and international energy suppliers, is crucial. This also applies to the necessary supply of water. Other materials, machinery, and equipment procured by global suppliers are also essential. Global logistics service providers as well as some of the company's own logistics manage the transport of raw materials and other goods to the production sites.

The combination of material and processing expertise as a key factor in voestalpine's success is reflected in the broad value chain in the Group's own business activities. This ranges from the steel production and the further processing and refinement of the products to the production of ready-to-install components, system solutions, and services. Steel production takes place at sites in Austria, Sweden, and Brazil, while further production steps are distributed globally. The specific activities and final products of the divisions vary depending on the business unit. The undertaking's own logistics ensures the transport of materials and semi-finished products to and between the undertaking's sites. At its large production sites, voestalpine generates electricity from process gases and uses it to power both the production process and the downstream processing steps. This enables the Group to cover a large part of its electricity requirements from its own generation.

voestalpine manufactures various flat and long products, but also further-processed products and ready-to-install components, e.g., for tool making, the automotive and energy industry, aerospace, construction and mechanical engineering, the consumer goods and food industry, as well as system solutions, for example for railway infrastructure or storage technology.

Research and development is pursued along all production activities of voestalpine, especially with regard to decarbonizing steel production. The increased expansion of the circular economy, in particular with the use of recycled materials such as steel scrap, or the reprocessing of by-products, will make production more sustainable. At the same time, state-of-the-art technologies and optimized processes make it possible to increase efficiency along the entire production chain and significantly improve the Group's environmental footprint.

In its own operations, voestalpine attaches great importance to the safety and well-being of its employees in order to ensure sustainable and responsible production. Employees can express their interests to the company in various ways and trust that their needs will be taken into account in decision-making processes.

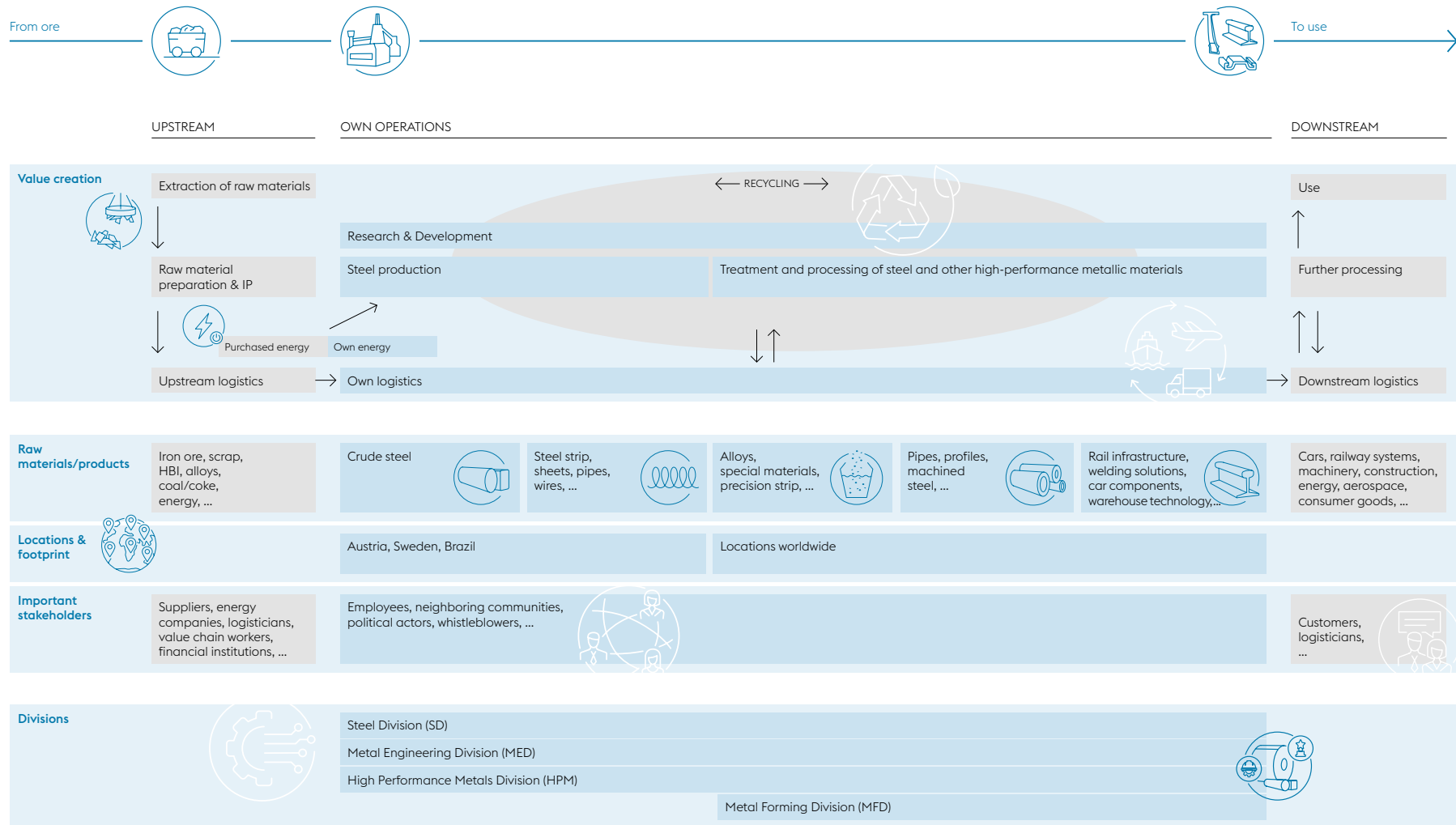
The downstream value chain includes the worldwide transportation of voestalpine products to business customers, their industrial processing, and final use by end customers. At the end of their useful life, a proportion of the products are recycled. This promotes a circular economy and contributes to the company's sustainability goals. In the event of planned operational changes at the sites, the neighboring communities, political actors, and other stakeholders are involved in order to take local requirements into account and promote social acceptance.

The customers of voestalpine are made up of business customers from various industries and geographical markets, in particular from the automotive, energy, and aerospace industries, rail infrastructure, mechanical engineering, and the construction and consumer goods industry. The main geographical markets are located in Europe, North and South America, Asia and, depending on the business unit, in additional complementary markets.

A close dialogue is maintained between voestalpine and its customers, who are placing increasingly high demands on reducing the carbon footprint in their supply chains. This demand for "green steel" has led to an uptick in the development of solutions produced in collaboration with customers to increase efficiency and reduce emissions throughout the product lifecycle. These include innovative recycling processes and energy-efficient production technologies.

Additionally, voestalpine attaches great importance to transparency in the value chain. Environmental impacts and adverse social impacts, such as labor and human rights violations, need to be minimized to the greatest possible extent. In cooperation with suppliers, attention is paid to compliance with environmental and social standards.

# voestalpine VALUE CHAIN

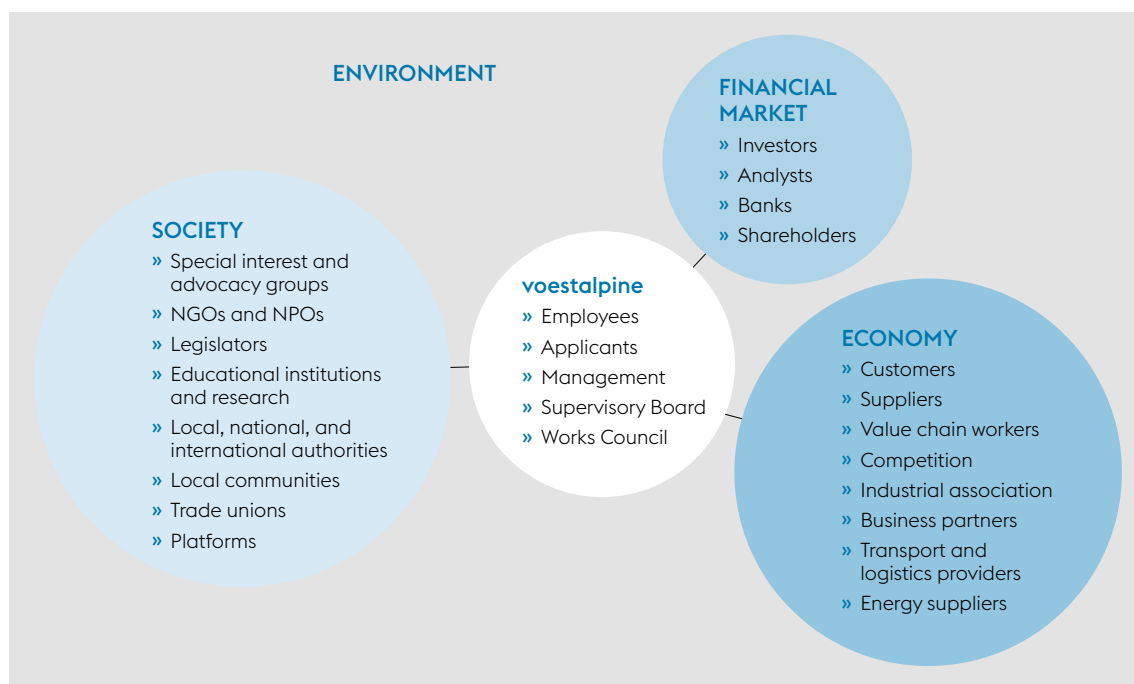


## SBM-2 – Interests and views of stakeholders

Stakeholders are persons or groups who can affect or be affected by voestalpine. They can be broken down into affected and interested stakeholders.

Identifying the relevant stakeholders and analyzing their requirements, interests, and expectations were core tasks to which voestalpine devoted itself in a structured and comprehensive manner in the business year 2023/24 as part of its double materiality assessment. The list of stakeholders is reviewed at regular intervals to ensure that it is complete and up to date. The following table shows an overview of key stakeholders.

### STAKEHOLDER CATEGORIZATION



The involvement of stakeholders includes representatives of affected groups such as trade unions, works councils, local communities, non-governmental organizations, suppliers, business partners, customer representatives, and industry associations. In addition, voestalpine works with sustainability experts from the world of academia and actively engages in a dialogue with users of the sustainability report, such as public authorities, banks, and investors. The undertaking takes into account their information needs with regard to the policies, actions, metrics, and targets of voestalpine in relation to material sustainability matters. Exchanges with the various stakeholder groups take place regularly in different formats and address the issues of relevance to them.

The selected and most important stakeholders were involved in the double materiality assessment in two ways: through face-to-face interviews and a large-scale anonymous online survey (see also IRO-1). In addition, the administrative, management, and supervisory bodies were informed about the views and interests of stakeholders with regard to voestalpine's sustainability-related impacts during sustainability board meetings.

Sustainability matters are increasingly becoming a main topic in voestalpine's communications with customers and suppliers, as well as with analysts, investors, NGOs, platforms, and advocacy groups. As far as the topic of sustainability is concerned, greenhouse gas emissions and climate-related risks, human rights in both the undertaking and the supply chain, as well as the EU Taxonomy Regulation, are often relevant concerns that are frequently discussed with stakeholders such as analysts and investors, for example. These frequently long-term relationships with customers and suppliers provide the basis for trusting and transparent partnerships.

As a global steel company, voestalpine pursues a sustainable business model with a clear focus on decarbonization, resource efficiency, and circular economy. The shift towards more climate-friendly technologies and the focus on employees are central elements of the corporate strategy. The interests of relevant stakeholders are actively taken into account. In this way, voestalpine not only strengthens its long-term competitiveness, but also assumes responsibility for the interests of its stakeholders.

The suggestions, proposals, and expectations of voestalpine's stakeholders are taken into account in strategic deliberations. This approach ensures transparent decision-making and strengthens trust in the undertaking. Taking into account different stakeholders helps to develop and implement a responsible and sustainable business strategy.

The following section outlines how communication with key stakeholders is structured. The examples given include the main stakeholder groups as well as the platforms most commonly used by voestalpine for dialogue and reconciling interests with them. voestalpine is in regular contact with a wide range of stakeholder groups through its Management Board, as well as its executive and non-executive personnel. Numerous opportunities are used for this, such as expert discussions and expert groups, events, conferences, trade fairs, and customer surveys.

## **EMPLOYEES**

The voestalpine Group currently has a global workforce of 48,010 employees. Both the annual employee performance review and the regular Group-wide employee survey are key tools for engaging in structured communications. Employees' feedback is analyzed by management and flows into any action plans the company develops—for example, with respect to personnel development.

In many voestalpine Group companies, a works council represents employees' interests. Local works councils are superseded by a European Works Council and a Group Works Council, both of which hold regular discussions with management. Through internal audits and training courses—for example, on the topics of compliance, health and safety, IT security, or data privacy and protection—voestalpine ensures not only that its employees abide by and implement a range of requirements, but also that their knowledge is current.

## **CUSTOMERS AND SUPPLIERS**

voestalpine maintains open and close-knit relationships with all its business partners. These frequently long-term relationships with customers and suppliers provide the basis for trusting and transparent partnerships. Together, processes and products are developed that satisfy the requirements of all parties involved and ensure low-impact utilization of resources.

Sustainability matters are increasingly becoming the focus. Besides conventional supply chain management issues such as quality, costs, availability, and delivery dates, a greater role is increasingly played by climate change mitigation, energy and resource efficiency, as well as compliance with labor and human rights. The voestalpine Code of Conduct is binding for all suppliers and business partners.

### **ANALYSTS AND INVESTORS**

Institutional investors and analysts are a key stakeholder group of voestalpine in its capacity as a listed company. The members of the Management Board and the Investor Relations and Group Treasury departments maintain close contact with representatives of the owners and providers of capital, including through investor conferences, road shows, and individual meetings. Discussions with analysts and investors focus on the latest developments and the market situation as well as sustainability issues. In particular, the focus is on climate-relevant emissions and risks, respect for human rights in the company and in the supply chain, and regulatory requirements such as the EU Taxonomy Regulation.

### **EDUCATIONAL INSTITUTIONS AND RESEARCH**

voestalpine's collaboration with both universities and unaffiliated research institutes is indispensable and boosts the Group's research and development work. voestalpine supports outstanding dissertations, master's theses, and research projects. It also endows professorships that can generate knowledge relevant to its core business and contribute new insights. The members of voestalpine's Management Board personally represent the Group during special student events (some of which are also held virtually) and answer questions from the students, who, in their capacity as potential future employees, are considered an important stakeholder group.

### **NGOS, SPECIAL INTEREST GROUPS, AND PLATFORMS**

Representatives of voestalpine belong to various working groups and committees of advocacy groups and platforms. These include the Federation of Austrian Industries, the World Steel Association ("world-steel"); ASMET (the Austrian Society for Metallurgy and Materials); ESTEP (the European Steel Technology Platform); and AFRAC (the Austrian Financial Reporting Advisory Committee). In addition, voestalpine actively engages in political debates with relevant industry associations such as the European Steel Association (EUROFER) and the European Rail Supply Industry Association (UNIFE) in order to present its views on socially and politically-relevant topics or to support a unified approach to the interpretation of particular statutory norms.

In April 2019, voestalpine became a member of ResponsibleSteel which focuses on the sustainable production of steel and the sustainable procurement of both raw and other materials. voestalpine actively engages in the ongoing development of the standard on which these policy initiatives are based. In the summer of 2021, the Group's largest steel plant (located in Linz, Austria) underwent an audit process aimed at obtaining certification pursuant to the ResponsibleSteel Standard; it is one of the very first steel companies to have done so. The surveillance audit provided for in the audit process was also completed with a positive outcome in the summer of 2024.

The company also maintains good communications with non-governmental organizations (NGOs). Its Management Board and experts engage in intensive and constructive exchanges of opinion with several NGOs, particularly with respect to energy and climate policies as well as other environmental topics.

The following outlines how the interests, views, and rights of its own workers, workers in the value chain, and affected communities are integrated into the strategy and the business model:

#### **SBM-2 – S1 OWN WORKFORCE**

The ongoing engagement of the workforce in decision-making processes not only strengthens the corporate culture but also ensures that the strategic direction of voestalpine is specifically tailored to the needs and expectations of its employees. Structured feedback processes make it possible to identify needs at an early stage, identify potential for improvement, and systematically incorporate these into business-critical decisions. Respect for human rights is a top priority: Internal guidelines, training courses, and monitoring mechanisms ensure that labor and social standards for all employees are consistently adhered to and continuously developed. The HR Strategy 2030+ is derived from voestalpine's Group-wide strategy, whereby the Group's own workforce is included in the strategy.

#### **SBM-2 – S2 WORKERS IN THE VALUE CHAIN**

There is currently no standardized process in place for the direct involvement of value chain workers. Involvement occurs on occasion and the value chain workers can use the whistleblower system. A direct involvement process will be developed in preparation for the requirements of the CSDDD. Indirectly, this involves regular exchanges and close cooperation with relevant suppliers. For more information, see the topic-specific information on S2.

#### **SBM-2 – S3 AFFECTED COMMUNITIES**

Local communities, such as those located in the immediate vicinity of production facilities, are regularly involved in dialogues in the regions in which voestalpine operates, in order to understand their needs and concerns with regard to the company's activities. Based on this feedback, the company develops action plans that take into account both the economic success of voestalpine and the social and environmental concerns of the affected communities. In addition, the views of the communities are essential when it comes to ensuring voestalpine plays a long-term role as an important employer in the respective local communities. Further information is provided in the specific information on S3.

#### **SBM-3 – Material impacts, risks, and opportunities and their interaction with strategy and business model**

Prior to the compilation of this sustainability report, voestalpine identified and assessed its impacts on the environment and society (impact materiality) as well as the sustainability-related financial risks and opportunities (financial materiality) for the Group. The impacts, risks, and opportunities (IROs) assessed as material were assigned to the sustainability matters in accordance with ESRS 1 AR 16. In an aggregated presentation, nine of the ten topics for which topic-related standards are set forth in ESRSs were assessed as material. Only the issue of consumers and end-users (ESRS S4) was considered to be non-material.

The following topics are material and covered in the reporting through the application of the respective standards:

- » Climate change (ESRS E1)
- » Pollution (ESRS E2)
- » Water and marine resources (ESRS E3)
- » Biodiversity and ecosystems (ESRS E4)
- » Resource use and circular economy (ESRS E5)
- » Own workforce (ESRS S1)
- » Workers in the value chain (ESRS S2)
- » Affected communities (ESRS S3)
- » Business conduct (ESRS G1)

In addition, the topics of innovation, research, and development were assessed as being material. The company-specific information on these issues can be found in the chapter on Environment or Corporate governance. For more information on the materiality assessment, see chapter IRO-1. In addition, voluntary information on taxation is disclosed in this report.

#### **STATEMENT ON AMENDMENTS TO THE REPORT**

The initial double materiality assessment identified 37 impacts, risks, and opportunities (IROs), consisting of nine negative and 14 positive impacts, and 10 risks and four opportunities. Based on new findings and improved understanding, the analysis for the 2025/26 reporting year was reviewed and revised again. The number of IROs has been refined and reduced to 28. For the current reporting year, voestalpine reports seven negative and 11 positive impacts as well as seven risks and three opportunities. The reduction in IROs was achieved in particular by aggregating thematically similar IROs. In addition, targeted reformulations led to refinement of the content and clearer demarcation (as part of the revision, e.g., baseline scenario vs. actual positive impact). In some cases, IROs have been removed on the basis of reasonable criteria as they were no longer considered relevant. In addition, three new impacts were identified, assessed by experts, and classified as material.

The following table summarizes the key voestalpine IROs. Detailed information on the individual IROs as well as on the policies, actions, targets, and metrics with which voestalpine manages them is provided at the beginning of each of the topic-specific chapters of this sustainability report.

ESRS	Topic/sub-topic/sub-sub-topic	Impact, risk, opportunity (IRO)	Value Chain	Time horizon	Reference
E1	Climate change mitigation	● GHG emissions (Scope 1 to 3)	>>>	●●●●	p. 181
		○ Technological developments & job infrastructure	>>>	●●●●	p. 181
		! Transition risk: Technical transition to low-emission technologies	>>>	○●●●	p. 181
		! Transition risk: Costs arising from carbon pricing	>>>	●●●●	p. 181
		+ Transition opportunity: Increasing the sales volumes of sustainable/low-emission steel products for voestalpine (especially in sectors relevant to the energy transition) leads to a sustainable stabilization of revenue and operating results (EBIT)	>>>	●●●●	p. 181
		! Transition risk: Supply bottlenecks or higher costs for important raw and other materials	>>>	○●●●	p. 182
	Climate change adaptation	! Physical climate risks	>>>	○●●●	p. 182
	Energy	! Transition risk: Bottlenecks in the energy supply and higher costs for energy procurement	>>>	●●●●	p. 182
E2	Air pollution	● NO <sub>x</sub> , SO <sub>x</sub> and dust emissions	>>>	●●●●	p. 202
E3	Water	● Water withdrawal, water consumption	>>>	●●●●	p. 209
E4	Biodiversity and ecosystems	● Biodiversity in the upstream value chain	>>>	●●●●	p. 214
E5	Resources inflows, including resource use	● Sourcing and use of primary resources	>>>	●●●●	p. 217
	Resource outflows related to products and services; and waste	● Business models for recycling	>>>	○●●●	p. 217
I, R&D	Innovation, research & development	● Product innovations	>>>	●●●●	p. 228
		+ Breakthrough technologies	>>>	●●●●	p. 228
		+ Increased recycling efficiency through technological innovation	>>>	○●●●	p. 228
		! Ensuring product quality with increased use of scrap	>>>	○●●●	p. 228
S1	Working conditions and other work-related rights	● Attractive working conditions	>>>	●●●●	p. 242
	Health and safety	● Healthy and safe working conditions at voestalpine	>>>	●●●●	p. 242
		● Accidents at work, injuries, and occupational illnesses	>>>	●●●●	p. 242
	Equal treatment and opportunities for all	● Equal opportunities for all employees	>>>	●●●●	p. 243
Training and skills development	● Personal development and training	>>>	●●●●	p. 243	
S2	Worker rights and conditions in the value chain	○ Inappropriate or abusive working conditions in the value chain	>>>	●●●●	p. 275
S3	Affected communities	● Engagement with affected Communities	>>>	●●●●	p. 286
G1	Business ethics and corporate culture	● Shared values at voestalpine	>>>	●●●●	p. 294
		● Practiced corporate ethics	>>>	●●●●	p. 294
		! Violations of compliance guidelines and white-collar crime	>>>	●●●●	p. 294
	Management of relationships with suppliers including payment practices	○ Selection process for suppliers	>>>	●●●●	p. 295

**Key**  
● Actual positive impact ● Actual negative impact ○ Potential positive impact ○ Potential negative impact + Opportunity ! Risk  
>>> Upstream >>> Own operations >>> Downstream ●○○○ < 1 year ●●○○ 1 – 5 years ○●○○ 5 – 10 years ○○○● 10+ years

The identified material impacts, risks, and opportunities of voestalpine are regularly evaluated in order to establish the current and anticipated impact on business model and strategy, and to derive actions for dealing with material impacts and risks, if necessary. More detailed information on the material impacts, risks, and opportunities can be found in the tables in the topic-specific chapters of this sustainability report.

No material financial effects can be attributed to the opportunities and risks identified in the sustainability report in the business year 2025/26. Similarly, in the next reporting period, no material adjustments to the carrying amount of assets and liabilities reported in the IFRS consolidated financial statements are to be expected on the basis of the opportunities and risks identified in the sustainability report. Impairment losses of EUR 38.8 million and restructuring expenses of EUR 47.7 million were recognized in the business year 2024/25 in the Automotive Components business unit, partly due to the transitional climate risk “Decline in sales volume and margin due to structural change in European industry and competitive disadvantages as a result of unilateral EU regulation.”

The resilience of voestalpine’s strategy and business model is regularly analyzed and assessed as part of the strategy review process. Climate change disclosures are reported in section SBM-3 E1. The company is tackling the risk of “ensuring product quality with increased use of scrap metal” with a wide range of actions. At the heart of these actions is the increased focus on research in order to continue to be able to manufacture the highest quality steel products after transitioning from blast furnace to electric arc furnace production (see chapter I,R&D). There are sufficient policies and procedures in place to address the risk of violations of compliance guidelines and white-collar crime. For more information on this, see chapters G1-1 and G1-3.

Overall, it is considered that the actions already taken and planned are appropriate to reduce the sustainability risks identified and thus ensure voestalpine’s long-term resilience.

### SBM-3 – E1 CLIMATE CHANGE

voestalpine has identified five material climate-related risks, comprising one climate-related physical risk and four climate-related transition risks:

Climate-related risks		Risk
Climate-related physical risk	!	Acute and chronic physical climate risks
Climate-related transition risk	!	Transition risk: technical transition to low-emission technologies
	!	Transition risk: costs arising from carbon pricing
	!	Transition risk: supply bottlenecks and higher costs for important materials and raw materials
	!	Transition risk: bottlenecks in the energy supply and higher costs for energy procurement

Starting in the business year 2023/24, voestalpine conducted a physical and a transient climate risk analysis, which was completed in the business year 2024/25. On this basis, an analysis of the resilience of the business model and the corporate strategy was carried out. (For more information on the process, the critical assumptions, and the time horizons used in the climate risk analyses, see chapter IRO-1 E1.)

The analysis of voestalpine's resilience with regard to the risks identified takes into account both its own business activities and the activities along the upstream and downstream value chain. With regard to the upstream value chain, the focus was on the key raw materials and energy sources, while in the downstream value chain, the most important customer segments and market trends for future demand were included. All at-risk assets and business units that are relevant for the strategic orientation of the company, investment decisions as well as existing and planned climate change mitigation actions were analyzed.

### **Physical risks**

Based on the physical climate risk analysis, voestalpine has implemented a number of adaptation action plans at its key sites to minimize the impacts of physical climate risks to the greatest possible extent. Examples of such actions include, among others, structural measures such as flood protection and logistical adjustments in the event of low water levels. Activities are also being undertaken to counteract the impacts of long-term fluctuations in river levels, such as diversifying supply routes. Currently, these action plans are considered sufficient to effectively address the identified physical risks in the short, medium, and long term. Therefore, voestalpine does not currently see any vulnerability that assets or business activities could be significantly impacted by physical climate risks, and action plans already implemented and planned are considered suitable to reduce the physical climate risks identified and thus ensure voestalpine's long-term resilience to climate-related physical risks.

### **Transition risks**

Planned and current mitigation action plans were taken into account to determine the resilience of voestalpine with regard to the identified transition climate risks (see E1-3).

Carbon pricing mechanisms such as the EU Emissions Trading Scheme (ETS) and the Carbon Border Adjustment Mechanism (CBAM) are creating increasing financial burdens, potentially resulting in competitive disadvantages compared to non-EU competitors, and triggering structural changes in industry, such as the relocation of downstream industries and higher price competition.

A core element of voestalpine's strategic orientation is the decarbonization of steel production (see SBM-1) in order to counteract the risk of factors such as higher costs for carbon credits. Therefore, related investment decisions and climate change mitigation actions in business activity and business model are already taken into account (see E1-1 and E1-3), whereby voestalpine ensures the adaptation of the business model to climate change.

At the same time, associated transition risks may arise, in particular with regard to supply bottlenecks for energy, important raw materials, and associated higher costs, and changing competition, which are counteracted by ongoing actions (see E1-3).

By strategically aligning the business model with decarbonization on the one hand, and continuously evaluating the transition climate risks on the other, voestalpine is taking the necessary steps to adapt its business model to climate change in the medium and long term, while maintaining the necessary flexibility for regulatory changes and market dynamics.

The reliability of the resilience analysis is inherently linked to forecasting uncertainties due to the dependence on policy decisions and regulatory changes, the uncertainty of future carbon price trends, and technological change, with the assessment being largely based on professional judgment and experience-based assumptions.

### **SBM-3 – E4 BIODIVERSITY AND ECOSYSTEMS**

The materiality assessment did not identify any material impacts of voestalpine's activities on biodiversity and ecosystems or dependencies of the Group's activities on the respective ecosystem services at its own sites. In addition, no negative impacts of voestalpine activities on affected species or in terms of land degradation, desertification, or soil sealing have been identified. voestalpine recognizes that its greenhouse gas emissions contribute to climate change, which affects biodiversity. Due to the global impact of climate change and the lack of locational mapping of this impact to specific ecosystems or local sites, it cannot be quantified. Therefore, in the materiality assessment, the impact of climate change on biodiversity losses is not assessed as material for voestalpine's own operations.

### **SBM-3 – SOCIAL ISSUES**

The impacts that relate specifically to voestalpine's own workforce, the workforce in the value chain, and affected communities are partly due to voestalpine's business model and strategy. The labor-intensive processes of steel production, the global supply chain, and the strategically driven decarbonization are key impact drivers. These factors require continuous adaptations, particularly in terms of occupational safety, socially responsible procurement, and the targeted promotion of sustainability skills among employees. Their continued integration into corporate strategy not only addresses challenges, but also promotes positive developments—for example, through better working conditions, sustainable supply chains, and active engagement with the concerns of affected communities.

#### **SBM-3 – S1 Own workforce**

All employees may be affected by the material impacts of voestalpine's activities. In addition to its own employees, self-employed and contract workers provided by third party undertakings also work for voestalpine.

Employees refer to individuals with permanent or fixed-term contracts who work on a regular basis for voestalpine. According to Austrian labor law, management boards do not count as "employees."

Self-employed persons offer their services on a freelance basis and are engaged as external experts for specific projects or assignments.

Leased personnel are sent by third party undertakings or agencies to work temporarily at voestalpine. Care is taken to integrate these employees into the corporate culture and give them the support they need, including specific onboarding programs and periodic feedback sessions.

The positive impacts identified are the result of targeted measures taken by voestalpine to promote attractive working conditions and equal opportunity as well as personal development and training. Compliance with human rights is ensured through clear corporate policies, while healthy and safe working conditions are ensured through preventive safety measures, periodic training, and a comprehensive occupational health and safety management system. These positive impacts affect all of voestalpine's own workers.

No violations of human rights law or incidents involving child labor or forced labor were identified in the past business year. In order to continue to consistently prevent such violations, voestalpine regularly reviews its processes and implements targeted risk minimization measures.

The potential negative impacts of accidents, injuries, and occupational illnesses are based on individual cases and are neither systemic nor widespread. However, the materiality assessment found that production workers, especially those working in high-temperature areas or with heavy machinery, are at increased risk of work-related hazards due to the nature of their working environment. Detailed information on the corresponding mitigation measures is provided under S1-4.

The decommissioning of two coal-based blast furnace units and the commissioning of electric arc furnaces in Linz and Donawitz from 2027 will provide the affected workers with appropriate retraining and upskilling for green and sustainable technologies. This aims to ensure that they remain employable.

Currently, there are no known material risks or opportunities in relation to voestalpine's own workforce.

### **SBM-3 – S2 Workers in the value chain**

The materiality assessment identified that inappropriate or abusive working conditions have the potential to negatively affect workers in the value chain. This risk results from the global distribution of the workforce and the unintended occurrence of labor or human rights violations. This can result, among other things, in economic disadvantages, such as a deterioration in sustainability ratings by relevant stakeholders.

When identifying potential impacts, risks, and opportunities in the value chain, voestalpine gives special consideration to the following groups of workers:

- » Workers involved in the extraction of raw materials
- » Workers in logistics
- » Workers in metal processing for the production of input materials
- » External contractors on the voestalpine premises

As regards the above impact, all workers in the upstream value chain are affected. In the upstream value stream, these include workers of suppliers that supply goods, raw materials, and supplies to voestalpine. Workers identified as particularly vulnerable to negative impacts also include certain vulnerable groups such as migrant workers, people with special needs, women, minorities, and young and older workers. voestalpine recognizes that the risk of forced labor is particularly high when socio-economic vulnerabilities exist, labor law is poorly enforced, and supply chains are complex. voestalpine requires all active business partners to ensure safe and sound working conditions for all employees who work for a business partner or under their supervision.

voestalpine takes a risk-based approach to supply chain management that takes into account industry and country-specific risks associated with supplier activities. For example, workers at companies that produce raw materials and input materials such as ores, alloys, and other metals are known to be at an increased risk of labor and human rights abuses. Countries and regions where these rights are frequently violated are given special attention by voestalpine in the identification and management of IROs.

A country-specific risk analysis has shown that certain countries in voestalpine's upstream value chain are at increased risk of human rights violations. In order to prevent human rights violations—including child labor and forced labor—in the upstream value chain to the greatest possible extent, above all in risk-prone regions, voestalpine relies on rigorous due diligence processes and mandatory compliance with its Code of Conduct for Business Partners.

In the past business year, voestalpine purchased its raw materials and input products such as ores, alloys, reducing agents, and other metals from around 40 countries. A comparison with the country-specific risk analysis shows that this also includes countries such as Brazil, China, India, Mexico, Zambia, South Africa, Türkiye, Ukraine, Vietnam, and Zimbabwe. These countries present a high risk of human rights violations, child labor and pollution, among other risks.

### **SBM-3 – S3 Affected communities**

All affected communities that are likely to be materially impacted by voestalpine's business activities and value chain, including impacts from its products, services, and business relationships, are recorded in accordance with ESRS 2. In the course of the double materiality assessment, close cooperation and engagement with affected communities was identified as a material positive impact. The focus is on affected communities near the larger sites in Linz, Donawitz, and Kapfenberg. No material impacts, risks, or opportunities were identified for other communities along or at the endpoints of the value chain.

As voestalpine operates solely in developed industrial areas, its direct business activities do not in any way impinge on the rights of indigenous peoples. As part of supply chain management, however, suppliers are required to ensure that the rights of indigenous peoples are respected. In case of violations, voestalpine takes appropriate actions that may ultimately lead to the suspension or termination of the supply relationship.

Communities affected by material positive impacts arising from own activities in the vicinity of the aforementioned operational sites are:

- » Direct neighbors of production and processing sites
- » Employees
- » Works Council and trade unions
- » Politics at national and European level
- » Local, national, and international authorities
- » Educational institutions and research
- » NGOs and NPOs (civil society, citizens' initiatives)
- » Interest groups (statutory and voluntary)
- » Energy suppliers
- » General public, media

voestalpine's strategy is based on transparency and taking responsibility. Care is taken to ensure that the business activities not only bring economic success, but also make a positive contribution to society. Continuous and structured dialogues maintained with the affected communities ensure that their needs are taken into account to the greatest possible extent and that solutions to challenges are jointly developed. This includes engaging the respective communities in decision-making processes, regular communication on the Group's activities, and the implementation of initiatives to improve the quality of life and environmental conditions in the affected regions. Transparent and publicly available systems for reporting possible impacts directly to companies, going beyond official processes, are also a key element in this regard.

In addition to transparent information and social or charitable initiatives, voestalpine also focuses on labor market-related issues relating to school and vocational training, such as by collaborating with educational institutions, and safeguarding or expanding employment opportunities in the vicinity of relevant production sites. These activities aim not only to ensure economic resilience but also to promote social cohesion and the well-being of communities. These actions allow voestalpine to better understand the social, cultural, and environmental issues faced by affected communities. As an employer, voestalpine also contributes to economic stability in many of the regions in which it is located. In order to present its contribution to society with transparency, voestalpine publishes data on research and development, the environment, employment, and tax and contributions paid on its website <https://www.voestalpine.com/oesterreich/de/>.

## IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

### IRO-1 – Description of the process to identify and assess material impacts, risks, and opportunities

#### METHODOLOGICAL FRAMEWORK

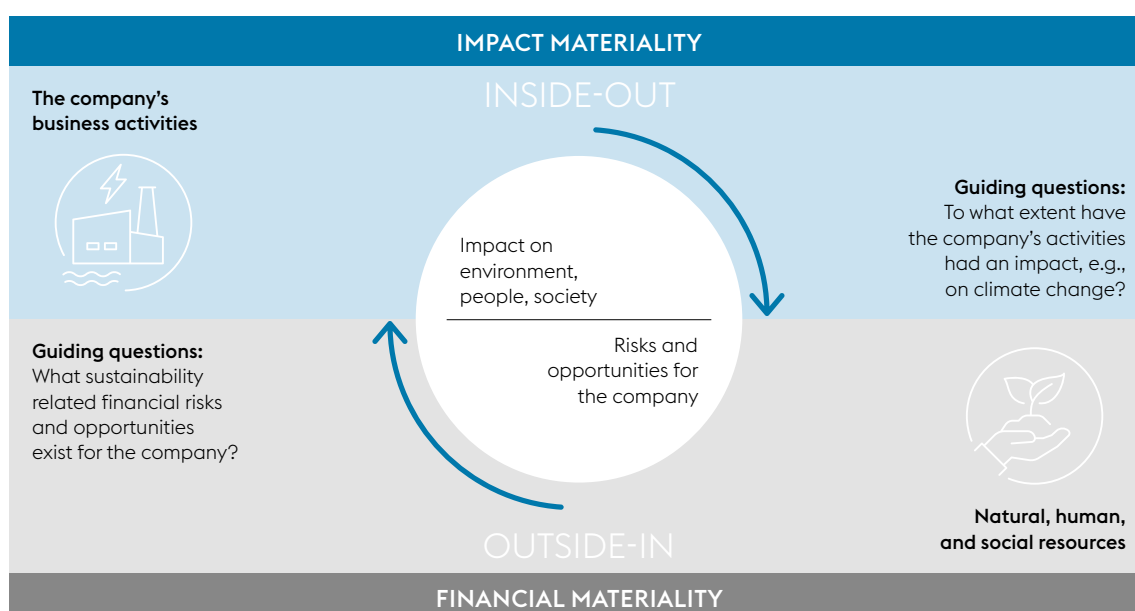
In 2024, voestalpine identified its material sustainability matters using the double materiality assessment. voestalpine's double materiality assessment was carried out in accordance with the methods and steps described in the European Sustainability Reporting Standards (ESRS). In accordance with

the principle of double materiality, two perspectives are taken into account in order to systematically record the interactions between the company and its environment:

**Inside-out perspective:** This perspective looks at the direct and indirect impacts of business activities on people and the environment. It examines the extent to which corporate practices affect people's well-being, social developments, or nature.

**Outside-in perspective:** This perspective looks at financial risks and opportunities that may arise from the company's impacts (e.g., through environmental damage in the upstream value chain) or from dependencies on external factors (such as an increase in water stress at production sites). Financial materiality thus describes how environmental, social, and governance aspects influence a company's economic performance and stability.

## MATERIALITY ASSESSMENT



The results of the materiality assessment form the basis for the quantitative and qualitative disclosures required in the sustainability report. At the same time, they support strategic planning and operational alignment in relation to the environment, social affairs, and corporate governance.

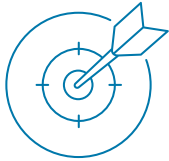
The double materiality assessment process, which voestalpine carried out for the first time in the business year 2023/24, comprises seven consecutive steps and is in line with ESRS requirements. The process was documented, coordinated internally, and reviewed externally.

## MATERIALITY ASSESSMENT PROCESS



### 1. Materiality policy

- » **Detailed concept** and approach to materiality assessment based on the double materiality principle (DMA)
- » Assessment of materiality requirements and comparison to current status
- » Definition of targets and priorities for the DMA
- » Alignment of the multi-annual process with controls and verifications



### 2. Identification of topics (long and short list)

- » **Preparation of a long list of material topics** taking into account the ESRS
- » Provision of workshops for internal experts to prioritize long list topics, bundle topics, and **prepare the short list**



### 3. Deep-dive on material topics

- » **Description** of short list topics to ensure consistent understanding and avoid overlaps
- » **Creation of value chain mapping** for the short list topics to be included in the stakeholder survey



### 4. Stakeholder survey

- » Preparation of detailed stakeholder survey policy
- » **Survey of selected stakeholders on defined topics** via online survey tool and expert interviews
- » **Stakeholder relevance assessment** for prioritized topics and evaluation of the impacts of selected stakeholder topics



### 5. Evaluation of impacts, risks, and opportunities

- » **Inside-out analysis** (impacts on the environment and society) **and outside-in materiality** (risks and opportunities) of short list topics
- » Consideration of existing data, decision making on preparation of additional analyses
- » Provision of **workshops for internal experts** to validate the results



### 6. Prioritization of material topics

- » **Creation of a materiality matrix** based on consolidating inside-out, outside-in, and stakeholder perspectives
- » **Establishment of materiality thresholds**
- » Provision of **workshops for internal experts** to validate the results



### 7. Impacts on strategy and reporting

- » Analysis of changes in materiality assessment and possible **impacts on strategy and business model**
- » **Mapping** of the results of the materiality assessment **regarding ESRS standards** and development of a detailed list of datapoint level disclosure requirements

The plan is to carry out the entire materiality assessment process every five years moving forward. If there are significant changes within the Group, an early update will take place. Irrespective of this, an annual review will be conducted to determine whether the identified material IROs are still relevant or whether adjustments to the reporting requirements and datapoints are necessary in the sustainability report. A corresponding review has already been carried out for the business year 2025/26. The IROs were revised and updated in terms of their materiality.

The organizational scope has been specified for the Group's own business activities in order to identify whether an IRO affects individual business units or the entire Group. No additional material impacts were identified for companies that are not fully consolidated. Due to their financial immateriality, these companies were excluded as sources of material risks or opportunities. Accordingly, the IROs and KPIs in the sustainability report that relate to the company's own value creation refer to the same scope of consolidation as the financial reporting. If material IROs are identified in future in relation to controlled entities that are not included in the Consolidated Financial Statements, they will be included in the scope of the report.

This does not pertain to specific datapoints that involve non-controlled companies, such as Scope 3 emissions, in accordance with EFRAG IG 2 Value Chain.

#### **Identification of impacts, risks, and opportunities**

At the beginning of the process, the corporate context was analyzed. This included a review of business activities, business relationships, upstream and downstream value chains, and affected stakeholders in order to identify the relevant sustainability matters.

To identify impacts, risks, and opportunities (IROs), voestalpine used, among other things, the list of sustainability matters defined in ESRs. All aspects were systematically reviewed to determine whether they are linked to IROs in voestalpine's own value chain or in the upstream and downstream value chains. The identification and prioritization of the material topics and the derivation of the actual and related potential impacts, risks, and opportunities were carried out as part of a structured project management process for implementing the CSRD. To this end, the project involved in-house teams of experts responsible for the relevant topics and systematically examined whether the risk and opportunity analysis resulted from the company-related impacts or from significant resource and stakeholder dependencies.

Priorities related to specific activities, business relationships, geographical areas, or other issues have not been set for the time being.

International corporate due diligence instruments and recognized reporting standards, in particular ESRs, ISSB standards, and other requirements in accordance with EFRAG implementation guidelines, served as the methodological basis for determining IROs. In addition, publicly available risk lists for transition and physical climate risks were taken into account.

External data sources such as academic studies, market research, and the results of stakeholder surveys were used to substantiate the content.

#### **Stakeholder engagement**

The stakeholders involved were selected by the project core team. Prior to this, a discussion was held with voestalpine stakeholder management experts. Based on this, the stakeholders who could potentially

be involved were assessed in a workshop in terms of their importance and accessibility. Importance was measured by the level of interest of a stakeholder group in the sustainable development of voestalpine, and the extent of its influence on the company. The importance rating was crucial in determining whether a stakeholder group should be involved, and the accessibility rating determined how this should be achieved.

In order to define the interaction methodology for each stakeholder group, the groups were categorized according to their accessibility. Stakeholder engagement was conducted in two different ways: Through face-to-face interviews and a large-scale anonymous online survey.

In addition, internal information was incorporated, in particular existing risk matrices from the departments and internal company reports.

In the further course of the materiality assessment, an assessment was obtained from stakeholders.

A total of 130 internal and external stakeholders, divided into employee representatives, suppliers, customers, shareholders, investors, and governmental and non-governmental organizations, were included in the assessment.

#### **Assessment of IROs**

All identified IROs were assessed in several workshops using the criteria set out in ESRS 1 and the EFRAG implementation guidance for the materiality assessment, as explained below. All relevant internal experts were involved in the assessment process.

#### **Assessment approach for positive and negative impacts**

The severity of positive and negative impacts was evaluated on the basis of specific assessment criteria. The first step was to determine the severity of an impact. This was decided based on the extent of the impact, the scope of the areas or people affected, and irreversibility in the case of negative impacts.

The severity describes the extent of the damage or benefit that an impact has or may have on people and the environment, including irreversible damage and long-term adverse effects on the people or ecosystems involved. In the case of potential impacts, the likelihood of occurrence was also included in the assessment. Likelihood of occurrence is calculated on the basis of historical data, current trends, and scientific forecasts.

For potential human rights-related impacts, the severity of the impacts took precedence over their likelihood of occurrence.

#### **Assessment approach for risks and opportunities**

The materiality of risks and opportunities was also determined using specific assessment criteria. The starting point was the potential extent of the financial impact, which was multiplied by the likelihood of occurrence.

### **Determination of reporting requirements based on material IROs**

Once the IROs were identified and assessed, the sustainability topics material to this sustainability report were classified. To this end, thresholds for the materiality of IROs were defined. IROs that reached or exceeded the defined threshold of 2 (out of 3) were classified as material.

In addition, sustainability matters were classified as material if they were assessed as relevant by stakeholders or had at least one assigned negative impact with human rights relevance.

### **Embedding the materiality assessment in governance and Group processes**

All decisions within the scope of the materiality assessment were made by consensus in the core team on the basis of the assessments described. A specialized external consulting firm supported the process, ensured compliance with ESRS requirements, and made sure that decisions were based on factual and objective grounds. The final results of the materiality assessment were presented and approved at a Sustainability Board meeting.

The process for identifying, assessing, and managing impacts and risks is aligned with voestalpine's Group-wide risk management. Group Sustainability and the Internal Audit and Risk Management department work together in this regard: Sustainability risks identified in the materiality assessment are then analyzed by Risk Management in accordance with Group-wide assessment criteria and on an equal footing with other business risks. The results of these assessments are incorporated into the Group risk profile and form the basis for deriving targeted measures to mitigate risks.

Material opportunities identified in the materiality assessment are also incorporated in existing voestalpine management processes—in particular in strategic corporate planning and innovation management. The aim is to systematically exploit these opportunities—for example, by tapping into new market potential or developing and launching sustainable products to strengthen competitiveness in the long term.

### **IRO-1 – E1 CLIMATE CHANGE**

voestalpine has implemented the following procedures to identify and assess significant climate-related impacts, risks, and opportunities:

#### **Identification of material climate impacts**

voestalpine's activities and plans were reviewed as part of the materiality assessment to identify actual and potential future sources of greenhouse gas emissions and, where applicable, causes of other climate-related impacts by calculating the greenhouse gas footprint for Scope 1, 2, and 3 emissions. Further information on GHG accounting can be found under E1-6.

Due to the energy- and GHG-intensive nature of its activities, the actual material negative impact of GHG emissions (Scope 1, 2, 3) was identified.

#### **Procedure for identifying and assessing material climate-related risks and opportunities for voestalpine**

voestalpine has identified its material climate-related risks and opportunities as part of climate-related scenario analyses. These are described in detail in section ESRS 2 SBM-3 of the General information and are divided into physical and transition climate risks.

The physical climate risks were analyzed on a site-specific basis, while the transition climate risks cover the decarbonization of the entire steel production process. The risks identified in both categories are incorporated into the resilience analysis, which assesses the company's resilience to these climate-related risks and opportunities.

The risk analyses are initially carried out on a gross basis, i.e., the risks and opportunities are considered in their natural form, namely in the form in which they could affect the business without taking countermeasures into account. The net view is then analyzed, in which the risks and opportunities are reassessed after countermeasures have been implemented. Based on these two aspects, the company's resilience to climate-related risks and opportunities is determined.

The climate scenarios used in the analyses are consistent with the critical climate-related assumptions in the financial statements (for further details, see also B.2. Significant judgments and estimates in the notes to the Consolidated Financial Statements).

### **Physical climate risk analysis**

For the physical scenario analysis, which was carried out as part of the EU Taxonomy and meets all ESRS requirements, various climate scenarios from a simulation-based solution were used. The analysis covered key locations with an asset value of over EUR 10 million, as well as strategic hubs within own operations. This ensures that the material property, plant and equipment are adequately covered by the physical risk analysis. The upstream and downstream value chains were not included in the analysis. However, due to the high diversification of suppliers and customer segments, no significant physical climate risks are expected in these areas.

The scenario analysis for physical climate risks was carried out in three steps: First, the risks were identified, then the scenarios were calculated, and finally, adaptation solutions were evaluated and assessed as the third step. Risk identification includes the assessment of the respective economic activity and a climate risk assessment to determine which physical climate risks could affect the economic activity. The scenario calculation involves physical climate risk assessment based on the latest climate projections and future scenarios in order to analyze the risks in relation to the activity and its lifetime. When determining adaptation solutions, solutions that can reduce physical climate risk are evaluated.

The short and medium-term physical vulnerabilities associated with climate change from natural hazards—such as flooding or low water levels, snow load, drought, storms, and strong winds, or temperature fluctuations—were identified and reported as part of the implementation of the EU Taxonomy Regulation. Using a simulation-based solution for identifying, quantifying, and disclosing physical climate risks, detailed climate risk analyses were developed for all relevant operating sites. Physical climate risks were identified, quantified based on the variable likelihood of occurrence, scope, and duration of the risk, and subsequently documented. The methods were based on the representative concentration pathways used by the Intergovernmental Panel on Climate Change (IPCC): RCP 8.5 (= 4.8°C warming by 2100), RCP 6.0 (= 3 to 4°C by 2100), RCP 4.5 (= 2.6°C by 2100), and RCP 2.6 (= below 2°C target) of the future scenarios as well as status reports on climate change from the IPCC and key Copernicus services of the European Commission. Heavy rainfall, flooding, and mudslides, for example, have been identified as material acute climate risks for the voestalpine Group. A chronic climate risk stems from, for example, climate-related fluctuations in river levels, which can impair navigability (e.g., on the Danube) and thus cause supply chain problems.

The physical climate risk analysis uses select scenarios to examine risks up to the year 2100. The inclusion of RCP scenarios covers short-, medium-, and long-term time horizons (in accordance with ESRs). Investment cycles in the iron and steel industry are typically long; metallurgical plants (e.g., electric arc furnaces—EAFs) are often in operation for several decades. The use of the select scenarios therefore ensures that all relevant physical risks and opportunities with regard to assets and business activities are taken into account in the analysis.

Based on the results of the physical climate risk assessment, which illustrates the gross view of the risks, adaptation solutions were identified and implemented where necessary. These were defined and implemented at the level of the major sites.

In addition, the voestalpine Group also uses its management systems, such as the environmental management systems certified according to ISO 14001 or EMAS, which are widely implemented in the companies around the globe, to fulfill the DNSH criteria in the EU Taxonomy Regulation. These systems ensure that environmental impacts are identified and reviewed as to their relevance to a given operating site's local environment and that any adaptation solutions aimed at impact mitigation are developed as necessary. In particular, these analyses comprise and/or take into account environmental matters such as water (sustainable use and protection of water and marine resources) and biodiversity (protection and restoration of biodiversity and ecosystems). The environmental management systems define how the respective companies can improve their environmental performance, fulfill legal and other obligations, and achieve local environmental targets. In accordance with the Plan-Do-Check-Act approach (PDCA cycle), environmental targets are defined and the necessary measures are derived and implemented:

» **Plan:**

Identify and analyze problems or potential for improvement, set targets, and develop a detailed implementation plan

» **Do:**

Implement necessary actions in accordance with the implementation plan

» **Check:**

Monitor and evaluate the implementation results to determine whether the set targets have been achieved

» **Act:**

Derive and implement further actions based on the results of the review

### **Transition climate risk analysis**

In addition to physical climate risks, transition risks and opportunities were also analyzed to assess the resilience of voestalpine's business model and strategy under various decarbonization pathways and regulatory developments.

The transition climate risk analysis is based on the NGFS scenarios (Network for Greening the Financial System; scenarios; net-zero 2050 (1.5 °C), Below 2 °C, and Delayed Transition), which are recognized as suitable data sources in ESRs. voestalpine chose these climate scenarios because they explicitly consider variables for the raw materials industry, including steel, and thus reflect voestalpine's business model. Within the NGFS dataset, the REMIND-MAgPIE model was used, which is based on integrated, globally consistent macroeconomic and energy model assumptions with regional aggregation.

For the analysis of transition climate risks, voestalpine focused on the “Delayed Transition” scenario. This assumes that global annual emissions will not decrease significantly by 2030, requiring more stringent political measures to limit global warming to 2°C. This scenario was chosen because of the high relevance of the associated transition risks for the steel industry. The other NGFS scenarios are being monitored on an ongoing basis so that we can respond to changing conditions.

Key transition events that are important for the steel industry were systematically examined. These include the carbon price trend, regulatory requirements, the volatility of the energy markets, changing market and customer expectations, and changes in the capital market. The impacts of these factors have been analyzed in detail, documented, and assessed in terms of their relevance to voestalpine’s business model.

The final assessment of the materiality of all identified risks and opportunities was carried out using a materiality matrix containing the aspects of scope of damage and likelihood of occurrence. This assessment was carried out in an interdisciplinary workshop by a team of experts and then validated by specialists from various divisions of the company. To determine the time frame, transition risks were divided into short, medium, and long term: less than one year as short term, one to five years as medium term, five to ten years as long term, and over ten years as extended long term. In principle, all risks were assessed on a gross basis. The net assessment was only applied after the countermeasures had been implemented. As outlined in E1-1 with regard to the analysis of bound greenhouse gases, no material assets or business activities have been identified to date that would contradict the objectives of a climate neutral economy.

The material risks and opportunities are presented and explained in chapter SBM-3.

#### **IRO-1 – E2 POLLUTION**

As part of the materiality assessment, plants and sites were reviewed with regard to material air, water, and soil emissions. The focus was particularly on plants that fall under the Industrial Emissions Directive (IED) and those that are subject to reporting requirements under the European Pollutant Release and Transfer Register (E-PRTR). voestalpine has also implemented environmental management systems at production sites that either have a material environmental impact from a Group perspective or make a significant contribution to improving the Group’s overall environmental performance. These systems are described in detail under E2-1. The findings from these environmental management systems were incorporated into the assessment of significant sites and business activities. There was no separate analysis of the upstream and downstream value chain.

For process-related reasons, microplastics are neither used as raw materials in the manufacturing process nor contained in voestalpine’s products. Therefore, they do not represent a material issue.

As part of the materiality assessment, affected communities were included in the stakeholder analysis (through face-to-face interviews) while the environmental management systems were developed and implemented in consultation with authorities, technical experts, and, where appropriate, local representatives. This included identifying both the concerns and the potential impacts of voestalpine on these communities with regard to environmental pollution. Stakeholder feedback was incorporated into the assessment of material impacts, risks, and opportunities.

The following list contains the operating sites and business activities that were identified as material in relation to environmental pollution:

Site	Business activity	Country
voestalpine Stahl GmbH	Production site	Austria
voestalpine Grobblech GmbH	Production site	Austria
voestalpine BÖHLER Edelstahl GmbH & Co KG	Production site	Austria
Villares Metals S.A.	Production site	Brazil
Uddeholms AB	Production site	Sweden
voestalpine BÖHLER Bleche GmbH & Co KG	Production site	Austria
voestalpine Stahl Donawitz GmbH	Production site	Austria
voestalpine Rail Technology GmbH	Production site	Austria
voestalpine Steel Service Center Polska Sp. z o.o.	Production site	Poland
voestalpine Railway Systems JEZ, S.L.	Production site	Spain

### IRO-1 – E3 WATER AND MARINE RESOURCES

The material impacts, risks, and opportunities of voestalpine along the value chain were assessed as part of the materiality assessment, which also evaluated existing dependencies. In addition, the company reviewed its assets and business activities at significant production sites based on the findings of the environmental management systems (see IRO-1 E1 for more information), and a specially conducted water footprint and water scarcity study (see E3-4 for more detailed information) at key production sites.

The findings were incorporated into the assessment. At some of the production sites, it was found that significant amounts of river water are withdrawn for cooling purposes, which could have a negative impact on local ecosystems. A small number of voestalpine Group sites are located in regions affected by water stress. The associated water consumption corresponds to 2% of the total water consumption and is of secondary importance overall for the company's own activities or the upstream and downstream value chain (see ESRS E3-4 Water consumption).

Furthermore, no areas were identified that are affected by water risks or have a direct connection to oceans or marine resources.

In addition, voestalpine maintains an ongoing dialogue on water-related issues with local residents at its major production sites in the form of personal discussions and surveys. voestalpine also works closely with advocacy groups and governmental and non-governmental organizations to ensure that the concerns of all relevant stakeholders are fully considered and incorporated into decision-making processes.

The Water Footprint study found that in the upstream value chain, water is essential for the provision and preparation of raw materials. The following list summarizes the main raw materials, supplier sectors and regions of origin in the Group's upstream value chain.

Material	Sector	Region of origin
Iron ore	Provision of raw materials	Europe
		Australia
		South America
		North America
		South Africa
Coal	Provision of raw materials	Australia
		Europe
		North America
Scrap	Secondary raw material management	Europe
Aluminum	Secondary raw material management	Europe
Alloys (chromium, manganese, nickel, etc.)	Provision of raw materials	Europe
		Australia
		South America
		China
		South Africa
Quicklime	Provision of raw materials	Europe
		Europe
Magnesite	Provision of raw materials	Australia
		Europe
Calcium carbide	Provision of raw materials	Europe

#### IRO-1 – E4 BIODIVERSITY AND ECOSYSTEMS

Impacts on biodiversity and ecosystems along the value chain were assessed based on the materiality assessment described in IRO-1. One potentially negative impact on ecosystems was identified in the upstream value chain, which could occur in particular in the production of key raw materials such as iron ore and coal. In addition, dependencies on biodiversity, ecosystems, and ecosystem services were analyzed for voestalpine's own operations. The dependency analysis was conducted and evaluated by a panel of internal experts in a series of workshops. In addition, the smelting operations and sites located near vulnerable areas were analyzed by means of a site- and industry-specific risk filter that assessed various impacts on biodiversity. The analysis revealed that there are no business processes or activities at relevant sites that have a direct connection to biodiversity and ecosystem services. The aim was to identify the extent to which operational processes depend on biodiversity and ecosystems. voestalpine operates one site in a biodiversity-sensitive area and 15 sites in the vicinity of such protected areas. The results of the analysis show that there are currently no significant business activities at the sites examined that are directly functionally dependent on specific ecosystem services or biodiversity. The risk analysis also showed that there are no material impacts on the status of species at voestalpine sites. The analysis likewise revealed no material impacts on the extent and condition of ecosystems including through land degradation, desertification and soil sealing.

voestalpine recognizes that a number of factors—including GHG emissions, changes in land, fresh-water and salt water use, direct use of biodiversity, invasive alien species, pollution, and climate change—can have impacts on biodiversity. However, as this relationship is global and does not have a direct impact on specific ecosystems or local sites, it cannot be measured directly. While biodiversity loss is a local phenomenon, emissions have a global impact—therefore, the direct impact of climate change, changes in water use, the use of biological resources, invasive species, and pollution on biodiversity loss is not considered a material issue for voestalpine.

The analysis therefore did not identify any physical, transition, or systemic risks related to biodiversity. A resilience analysis with regard to biodiversity is therefore not relevant for voestalpine from the current perspective. However, risks and opportunities are reviewed regularly, and analyses are carried out if the framework conditions change.

As part of the materiality assessment, a stakeholder survey was conducted involving affected communities in the vicinity of the company's own sites. The survey was conducted through face-to-face interviews with the aim of identifying potential negative impacts on biodiversity. Communities along the upstream value chain were not the target group for the survey. The findings were incorporated into the identification of material topics. At this point in time, no material negative impacts on the communities involved in relation to biodiversity have been identified.

Even though no material negative impacts have been identified in its own operations, voestalpine implements activities to preserve biodiversity in accordance with legal requirements. These are based on various legal provisions, including Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds and Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

The company also conducts environmental impact assessments in accordance with Article 1(2)(g) of Directive 2011/92/EU. When operating in third countries, voestalpine complies with the relevant national regulations and international standards such as Performance Standard 6 of the International Finance Corporation (IFC) on biodiversity conservation and the sustainable management of natural resources.

In addition to the activities mentioned above in relation to its own sites, voestalpine has also introduced measures to mitigate negative impacts in the upstream value chain. Further details can be found in chapter E4-3 Actions and resources related to biodiversity and ecosystems.

#### **IRO-1 – E5 RESOURCE USE AND CIRCULAR ECONOMY**

In order to identify the impacts, risks, and opportunities associated with resource use and the circular economy along the value chain, voestalpine's resource inflows, outflows, and waste generated were systematically analyzed and evaluated as part of the materiality assessment. In addition, a value chain analysis was conducted in 2024 to identify high-risk countries in the upstream value chain. For the analysis, the relevant countries in voestalpine's upstream value chain were first identified. Risk categories (Fair Business Practices, Human Rights & Ethics, Environment, Labor Rights) were then assigned in line with ESRS standards, assessment scales defined and countries ranked by risk profile (low, medium, high risk). The insights gained were taken into account in the materiality assessment.

Iron ore, coking coal, steel scrap, alloys, and water have been identified as major resource inflows at voestalpine. As production processes transform, demand for steel scrap and HBI is constantly increasing, while demand for iron ore and coking coal is decreasing. Here, a special focus is placed on the future procurement of the increased amounts of steel scrap within the value chain. The procurement processes are based on the purchasing principles and the Group Strategy 2030+.

<b>Key raw materials 2025/26</b>	<b>Steel Division</b>	<b>High Performance Metals Division</b>	<b>Metal Engineering Division</b>	<b>Metal Forming Division</b>
Iron ore	X		X	
Coking coal	X		X	
Steel scrap	X	X	X	
Alloys	X	X	X	
Water	X	X	X	X

Findings from the environmental management systems were taken into account, as were the recyclability of the products, the material properties of the raw materials used, and the possibilities for reuse.

Resource use and circular economy particularly affect steel production, the processing of metal products, and the recycling of residual materials. The main resources used are described in detail in E5-4.

The relevant aspects of resource use extend across the upstream and downstream value chain and include the procurement of primary raw materials. In addition, the recycling of products at the end of their life cycle plays a central role, as voestalpine aims to keep materials in the cycle for as long as possible. The main negative impact focuses primarily on the upstream value chain through the extraction and processing of primary raw materials. Key measures related to the circular economy within voestalpine's own operations and in the upstream and downstream value chain can be found in chapter E5-2.

Further development into a Group circular economy strategy is necessary to ensure the long-term supply of raw materials and to significantly support voestalpine's sustainability targets. For more information on the circular economy strategy, see E5-1.

In the course of its strategic transformation, voestalpine is faced with the major challenge of ensuring product quality while increasing the use of scrap.

Consultations with key stakeholders were conducted as part of the stakeholder analysis in the context of the materiality assessment. Specific estimates on resource use and circular economy were collected. Feedback from affected communities and other relevant stakeholders, including customers and research institutions, was incorporated into the materiality assessment and taken into account when assessing materiality.

## **IRO-1 – G1 BUSINESS CONDUCT**

As part of the materiality assessment, an internal and external stakeholder survey was conducted to identify the material impacts, risks, and opportunities associated with business conduct. Various criteria were applied in the materiality assessment, including the location of economic activities, the type of activity carried out, and the corporate sector. Particular attention was paid to locations subject to increased regulatory requirements or specific compliance risks, while industry-specific regulations and market conditions were also systematically included in the assessment.

## **IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability report**

The contents of this sustainability report were identified on the basis of the double materiality analysis. The exact procedure for the double materiality assessment can be found in the section IRO-1. The selection of datapoints was based on the results of the materiality assessment. Based on this, a relevance analysis of the individual datapoints was carried out with the involvement of the respective departments. The materiality and applicability of individual datapoints was evaluated with regard to the gradual introduction of disclosure requirements. In addition, these were supplemented by company-specific datapoints on the topic of "Innovation, Research & Development" and the additional disclosure "Taxes".

The following table lists all disclosure requirements (including page references) disclosed in the sustainability report:

**DISCLOSURE AND APPLICATION REQUIREMENTS IN TOPICAL ESRS THAT ARE APPLICABLE IN CONJUNCTION WITH ESRS 2 GENERAL DISCLOSURES (ESRS 2 ANNEX C)**

		Page reference in the annual report
<b>General information</b>		
<b>ESRS 2</b>	<b>General information</b>	<b>p. 104</b>
BP-1	General basis for preparation of the sustainability report	p. 104
BP-2	Disclosures in relation to specific circumstances	p. 105
GOV-1	The role of the administrative, management, and supervisory bodies	p. 108
GOV-1 G1	Business conduct	p. 111
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management, and supervisory bodies	p. 112
GOV-3	Integration of sustainability-related performance in incentive schemes	p. 112
GOV-3 E1	Climate change	p. 113
GOV-4	Statement on due diligence	p. 113
GOV-5	Risk management and internal controls over sustainability reporting	p. 116
SBM-1	Strategy, business model, and value chain (Transitional provision for SBM-1 40 b, c used)	p. 119
SBM-2	Interests and views of stakeholders	p. 128
SBM-2 S1	Own workforce	p. 131
SBM-2 S2	Workers in the value chain	p. 131
SBM-2 S3	Affected communities	p. 131
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model (Transitional provision for SBM-3 48 e used)	p. 131
SBM-3 E1	Climate change	p. 134
SBM-3 E4	Biodiversity and ecosystems	p. 136
SBM-3 S1	Own workforce	p. 136
SBM-3 S2	Workers in the value chain	p. 137
SBM-3 S3	Affected communities	p. 138
IRO-1	Description of the processes to identify and assess material impacts, risks, and opportunities	p. 139
IRO-1 E1	Climate change	p. 144
IRO-1 E2	Pollution	p. 147
IRO-1 E3	Water and marine resources	p. 148
IRO-1 E4	Biodiversity and ecosystems	p. 149
IRO-1 E5	Resource use and circular economy	p. 150
IRO-1 G1	Business conduct	p. 152
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability report	p. 152

	Page reference in the annual report
<b>Environmental Information</b>	
<b>Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (EU Taxonomy Regulation)</b>	<b>p. 168</b>
<b>ESRS E1 Climate change</b>	<b>p. 180</b>
SBM-3 Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 180
E1-1 Transition plan for climate change mitigation	p. 183
E1-2 Policies related to climate change mitigation and adaption	p. 186
E1-3 Actions and resources in relation to climate change policies	p. 187
E1-4 Targets related to climate change mitigation and adaption	p. 192
E1-5 Energy consumption and mix	p. 195
E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	p. 197
E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Transitional provision
<b>ESRS E2 Pollution</b>	<b>p. 202</b>
SBM-3 Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 202
E2-1 Policies related to pollution	p. 202
E2-2 Actions and resources related to pollution	p. 204
E2-3 Targets related to pollution	p. 206
E2-4 Pollution of air, water, and soil	p. 206
<b>ESRS E3 Water and marine resources</b>	<b>p. 209</b>
SBM-3 Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 209
E3-1 Policies related to water and marine resources	p. 209
E3-2 Actions and resources related to water and marine resources	p. 211
E3-3 Targets related to water and marine resources	p. 211
E3-4 Water consumption	p. 212
<b>ESRS E4 Biodiversity and ecosystems</b>	<b>p. 214</b>
SBM-3 Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 214
E4-1 Transition plan and consideration of biodiversity and ecosystems in strategy and business model	p. 214
E4-2 Policies related to biodiversity and ecosystems	p. 215
E4-3 Actions and resources related to biodiversity and ecosystems	p. 215
E4-4 Targets related to biodiversity and ecosystems	p. 216
<b>ESRS E5 Resource use and circular economy</b>	<b>p. 217</b>
SBM-3 Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 217
E5-1 Policies related to resource use and circular economy	p. 217
E5-2 Actions and resources related to resource use and circular economy	p. 221

		Page reference in the annual report
<b>Environmental Information</b>		
E5-3	Targets related to resource use and circular economy	p. 222
E5-4	Resource inflows	p. 224
E5-5	Resource outflows	p. 225
<b>Innovation, research, and development</b>		<b>p. 228</b>
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 228
I, R&D-1	Policies related to innovation, research, and development	p. 229
I, R&D-2	Actions and resources related to innovation, research, and development	p. 233
I, R&D-3	Targets related to innovation, research, and development	p. 239
I, R&D-4	Metrics related to innovation, research, and development	p. 239

		Page reference in the annual report
<b>Social Information</b>		
<b>ESRS S1</b>	<b>Own workforce</b>	<b>p. 242</b>
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 242
S1-1	Policies related to own workforce	p. 243
S1-2	Processes for engaging with own workers and workers' representatives about impacts	p. 252
S1-3	Processes to remediate negative impacts and channels for own work-ers to raise concerns	p. 254
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	p. 255
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p. 263
S1-6	Characteristics of the undertaking's employees	p. 266
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	Transitional provision
S1-8	Collective bargaining coverage and social dialogue (Transitional provision under ESRS used)	p. 267
S1-9	Diversity metrics	p. 268
S1-10	Adequate wages	p. 269
S1-12	Persons with disabilities	Transitional provision
S1-13	Training and skills development metrics	Transitional provision
S1-14	Health and safety metrics (Transitional provision under ESRS used)	p. 269
S1-15	Work-life balance	Transitional provision

		Page reference in the annual report
<b>Social Information</b>		
S1-16	Compensation metrics (pay gap and total compensation)	p. 270
S1-17	Incidents, complaints, and severe human rights impacts	p. 271
<b>ESRS S2</b>	<b>Workers in the value chain</b>	<b>p. 275</b>
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 275
S2-1	Policies related to value chain workers	p. 276
S2-2	Processes for engaging with value chain workers about impacts	p. 280
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	p. 280
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	p. 281
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p. 284
<b>ESRS S3</b>	<b>Affected communities</b>	<b>p. 286</b>
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 286
S3-1	Policies related to affected communities	p. 286
S3-2	Processes for engaging with affected communities about impacts	p. 288
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	p. 290
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	p. 292
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p. 293
		<b>Page reference in the annual report</b>
<b>Corporate governance</b>		
<b>ESRS G1</b>	<b>Business conduct</b>	<b>p. 294</b>
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 294
G1-1	Corporate culture and business conduct policies and corporate culture	p. 295
G1-2	Management of relationships with suppliers	p. 306
G1-3	Prevention and detection of corruption and bribery	p. 308
G1-4	Confirmed incidents of corruption or bribery	p. 311
<b>Taxes</b>		<b>p. 312</b>

The following is a summary of all datapoints resulting from other EU legislation listed in ESRS 2 Annex B, including references to the relevant page number or information that the datapoint was not considered material.

#### LIST OF DATAPOINTS IN CROSS-CUTTING AND TOPICAL STANDARDS THAT DERIVE FROM OTHER EU LEGISLATION (ESRS 2 ANNEX B)

Disclosure Requirement and related datapoint	(1) SFDR reference <sup>1</sup>	(2) Pillar 3 reference <sup>2</sup>	(3) Benchmark-Regulation reference <sup>3</sup>	(4) EU Climate Law reference <sup>4</sup>	Materiality	Page reference in the annual report
<b>ESRS 2 GOV-1</b> Board's gender diversity paragraph 21 (d)	Indicator number 13 Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 <sup>5</sup> , Annex II		Material	p. 109
<b>ESRS 2 GOV-1</b> Percentage of board members who are independent paragraph 21 (e)			Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	p. 111
<b>ESRS 2 GOV-4</b> Statement on due diligence paragraph 30	Indicator number 10 Table #1 of Annex 3				Material	p. 114
<b>ESRS 2 SBM-1</b> Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicator number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 <sup>6</sup> , Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Commission Delegated Regulation (EU) 2020/1816, Annex II		Immaterial	n.a.
<b>ESRS 2 SBM-1</b> Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #1 of Annex 2		Commission Delegated Regulation (EU) 2020/1816, Annex II		Immaterial	n.a.
<b>ESRS 2 SBM-1</b> Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 <sup>7</sup> , Article 12(1)		Immaterial	n.a.
<b>ESRS 2 SBM-1</b> Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Immaterial	n.a.

Disclosure Requirement and related datapoint	(1) SFDR reference <sup>1</sup>	(2) Pillar 3 reference <sup>2</sup>	(3) Benchmark-Regulation reference <sup>3</sup>	(4) EU Climate Law reference <sup>4</sup>	Materiality	Page reference in the annual report
<b>ESRS E1-1</b> Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119 Article 2(1)	Material	p. 184
<b>ESRS E1-1</b> Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		Material	p. 186
<b>ESRS E1-4</b> GHG emission reduction targets paragraph 34	Indicator number 4 Table #1 of Annex 2	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		Material	p. 193
<b>ESRS E1-5</b> Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 of Annex 1 and Indicator number 5 Table #1 of Annex 2				Material	p. 195
<b>ESRS E1-5</b> Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				Material	p. 195
<b>ESRS E1-5</b> Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				Material	p. 196
<b>ESRS E1-6</b> Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegation Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		Material	p. 198
<b>ESRS E1-6</b> Gross GHG emissions intensity paragraphs 53 to 55	Indicator number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Material	p. 200

Disclosure Requirement and related datapoint	(1) SFDR reference <sup>1</sup>	(2) Pillar 3 reference <sup>2</sup>	(3) Benchmark-Regulation reference <sup>3</sup>	(4) EU Climate Law reference <sup>4</sup>	Materiality	Page reference in the annual report
<b>ESRS E1-7</b> GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119 Article 2(1)	Immaterial	n.a.
<b>ESRS E1-9</b> Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Material (transitional provision)	n.a.
<b>ESRS E1-9</b> Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5: Banking book – Climate change physical risk: exposures subject to physical risk			Material (transitional provision)	n.a.
<b>ESRS E1-9</b> Location of significant assets at material physical risk paragraph 66 (c)						
<b>ESRS E1-9</b> Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book – Climate change transition risk: loans collateralized by immovable property – energy efficiency of the collateral			Material (transitional provision)	n.a.
<b>ESRS E1-9</b> Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Commission Delegated Regulation (EU) 2020/1818, Annex II		Material (transitional provision)	n.a.
<b>ESRS E2-4</b> Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Material	p. 207
<b>ESRS E3-1</b> Water and marine resources paragraph 9	Indicator number 7 Table #1 of Annex 2				Material	p. 211
<b>ESRS E3-1</b> Dedicated policy paragraph 13	Indicator number 8 Table #1 of Annex 2				Material	p. 209
<b>ESRS E3-1</b> Sustainable oceans and seas paragraph 14	Indicator number 12 Table #1 of Annex 2				Immaterial	n.a.

Disclosure Requirement and related datapoint	(1) SFDR reference <sup>1</sup>	(2) Pillar 3 reference <sup>2</sup>	(3) Benchmark-Regulation reference <sup>3</sup>	(4) EU Climate Law reference <sup>4</sup>	Materiality	Page reference in the annual report
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #1 of Annex 2				Material	p. 212
ESRS E3-4 Total water consumption in m <sup>3</sup> per net revenue on own operations paragraph 29	Indicator number 6.1 Table #1 of Annex 2				Material	p. 212
ESRS 2 – IRO 3 – E4 paragraph 16(a) i	Indicator number 7 Table #1 of Annex 1				Material	p. 136
ESRS 2 – IRO-3 – E4 paragraph 16 (b)	Indicator number 10 Table #1 of Annex 2				Material	p. 136
ESRS 2 – IRO-3 – E4 paragraph 16 (c)	Indicator number 14 Table #1 of Annex 2				Material	p. 136
ESRS E4-2 Sustainable land/agriculture practices or policies paragraph 24(b)	Indicator number 11 Table #1 of Annex 2				Immaterial	n.a.
ESRS E4-2 Sustainable oceans/seas practices or policies paragraph 24 (c)	Indicator number 12 Table #1 of Annex 2				Immaterial	n.a.
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #1 of Annex 2				Immaterial	n.a.
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #1 of Annex 2				Material	p. 227
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				Material	p. 227
ESRS 2 SBM3 – S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #1 of Annex 3				Material	p. 136
ESRS 2 SBM3 – S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #1 of Annex 3				Material	p. 136
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Material	p. 246

Disclosure Requirement and related datapoint	(1) SFDR reference <sup>1</sup>	(2) Pillar 3 reference <sup>2</sup>	(3) Benchmark-Regulation reference <sup>3</sup>	(4) EU Climate Law reference <sup>4</sup>	Materiality	Page reference in the annual report
<b>ESRS S1-1</b> Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 21			Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	p. 246
<b>ESRS S1-1</b> Processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #1 of Annex 3				Material	p. 246
<b>ESRS S1-1</b> Workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #1 of Annex 3				Material	p. 250
<b>ESRS S1-3</b> Grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #1 of Annex 3				Material	p. 255
<b>ESRS S1-14</b> Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #1 of Annex 3		Commission Delegated Regulation (EU) 2020/1816, Annex II		Material (partial use of transitional provision)	p. 269
<b>ESRS S1-14</b> Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #1 of Annex 3				Material (transitional provision)	n.a.
<b>ESRS S1-16</b> Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	p. 270
<b>ESRS S1-16</b> Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #1 of Annex 3				Material	p. 271
<b>ESRS S1-17</b> Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #1 of Annex 3				Material	p. 271
<b>ESRS S1-17</b> Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 of Annex 1 and Indicator number 14 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Material	p. 271
<b>ESRS 2 SBM3 – S2</b> Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and 13 Table #3 of Annex 1				Material	p. 138

Disclosure Requirement and related datapoint	(1) SFDR reference <sup>1</sup>	(2) Pillar 3 reference <sup>2</sup>	(3) Benchmark-Regulation reference <sup>3</sup>	(4) EU Climate Law reference <sup>4</sup>	Materiality	Page reference in the annual report
<b>ESRS S2-1</b> Human rights policy commitments paragraph 17	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Material	p. 276
<b>ESRS S2-1</b> Policies related to value chain workers paragraph 18	Indicators number 11 and 4 Table #3 of Annex 1				Material	p. 307
<b>ESRS S2-1</b> Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Material	p. 277
<b>ESRS S2-1</b> Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 19			Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	p. 276
<b>ESRS S2-4</b> Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #1 of Annex 3				Material	p. 281
<b>ESRS S3-1</b> Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Immaterial	n.a.
<b>ESRS S3-1</b> Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Material	p. 287
<b>ESRS S3-4</b> Human rights issues and incidents paragraph 36	Indicator number 14 Table #1 of Annex 3				Immaterial	n.a.
<b>ESRS S4-1</b> Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Immaterial	n.a.

Disclosure Requirement and related datapoint	(1) SFDR reference <sup>1</sup>	(2) Pillar 3 reference <sup>2</sup>	(3) Benchmark-Regulation reference <sup>3</sup>	(4) EU Climate Law reference <sup>4</sup>	Materiality	Page reference in the annual report
<b>ESRS S4-1</b> <b>Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17</b>	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Immaterial	n.a.
<b>ESRS S4-4</b> <b>Human rights issues and incidents paragraph 35</b>	Indicator number 14 Table #1 of Annex 3				Immaterial	n.a.
<b>ESRS G1-1</b> <b>United Nations Convention against Corruption paragraph 10 (b)</b>	Indicator number 15 Table #1 of Annex 3				Material	p. 297
<b>ESRS G1-1</b> <b>Protection of whistleblowers paragraph 10 (b)</b>	Indicator number 6 Table #1 of Annex 3				Material	p. 302
<b>ESRS G1-4</b> <b>Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)</b>	Indicator number 17 Table #1 of Annex 3		Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	p. 311
<b>ESRS G1-4</b> <b>Standards of anti-corruption and anti-bribery paragraph 24 (b)</b>	Indicator number 16 Table #1 of Annex 3				Material	p. 311

<sup>1</sup> Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (OJ L 317, 9/12/2019, p. 1).

<sup>2</sup> Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation "CRR") (OJ L 176, 27/6/2013, p. 1).

<sup>3</sup> Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29/6/2016, p. 1).

<sup>4</sup> Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') (OJ L 243, 9/7/2021, p. 1).

<sup>5</sup> Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are reflected in each benchmark provided and published (OJ L 406, 3/12/2020, p. 1).

<sup>6</sup> Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks (OJ L 324, 19/12/2022, p. 1).

<sup>7</sup> Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks (OJ L 406, 3/12/2020, p. 17).

## APPENDIX

### ResponsibleSteel

voestalpine commits itself to the 13 Principles of ResponsibleSteel, an advocacy organization. Furthermore, the production entities of the Steel Division completed their certification as sustainable steel-making facilities pursuant to the ResponsibleSteel Standard in the 2021/22 business year. Experts from voestalpine and many other companies along the steel supply chain as well as civil society representatives and other stakeholders actively participated in the preparation of this Standard.

#### **Principle 1: Corporate Governance**

ResponsibleSteel certified sites are led responsibly.

#### **Principle 2: Social, environmental, and governance management systems**

ResponsibleSteel certified sites have an effective management system in place to achieve the social, environmental, and governance objectives to which they are committed.

#### **Principle 3: Responsible procurement**

ResponsibleSteel certified sites are increasingly sourcing their raw materials from suppliers working to improve their environmental, social, and governance performance and address ESG risks.

#### **Principle 4: Decommissioning and closure**

ResponsibleSteel certified sites minimize the adverse social, economic, and environmental impacts of full or partial site decommissioning and closure.

#### **Principle 5: Occupational health and safety**

ResponsibleSteel certified sites protect the health and safety of waged and salaried employees.

#### **Principle 6: Labor rights**

ResponsibleSteel certified sites respect the rights of waged and salaried employees and support their well-being.

#### **Principle 7: Human rights**

ResponsibleSteel certified sites respect human rights wherever they operate, irrespective of their size or structure.

#### **Principle 8: Stakeholder engagement and communication**

ResponsibleSteel certified sites engage effectively with stakeholders, report openly on issues of importance to stakeholders, and remediate adverse impacts they have caused or contributed to.

#### **Principle 9: Local communities**

ResponsibleSteel certified sites respect the rights and interests of local communities, avoid and minimize adverse impacts, and support community well-being.

#### **Principle 10: Climate change and greenhouse gas emissions**

The corporate owners of ResponsibleSteel certified sites are committed to the global goals of the Paris Agreement, and both certified sites and their corporate owners are taking the actions needed to demonstrate this commitment.

**Principle 11: Noise, emissions, effluents, and waste**

ResponsibleSteel certified sites prevent and reduce emissions and effluents that have adverse effects on people or the environment, manage waste according to the waste management hierarchy, and take account of the full life cycle impacts of waste management options.

**Principle 12: Responsible water use**

ResponsibleSteel certified sites demonstrate good water stewardship.

**Principle 13: Biodiversity**

ResponsibleSteel certified sites protect and conserve biodiversity.

For further information, see <https://www.responsiblesteel.org/>.



**UN GLOBAL COMPACT**

**UN Global Compact—the 10 principles**

Since 2013, voestalpine has supported the UN Global Compact (UNGC) and its principles regarding human rights, labor standards, climate action, and the fight against corruption.

**HUMAN RIGHTS**

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses.

**LABOR STANDARDS**

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** the elimination of all forms of forced and bonded labor;

**Principle 5:** the effective abolition of child labor; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation.

**ENVIRONMENT**

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

**ANTI-CORRUPTION**

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.



## SUSTAINABLE DEVELOPMENT GOALS



The Sustainable Development Goals (SDGs) were drawn up by a United Nations working group, together with thousands of stakeholders, and adopted by a UN General Assembly Resolution during the United Nations Sustainable Development Summit in New York on September 25, 2015. A total of 193 UN member states committed to the 17 goals and 169 targets for global sustainable development and the related specific objectives.

The SDGs were put into effect as of January 1, 2016, and are designed to cover a period of 15 years (up to 2030). Particular emphasis was placed on the private sector's role in reaching these goals.

In its daily business activities, voestalpine contributes significantly to achieving the following 12 SDGs:

- » **Goal 3:** Good health and well-being
- » **Goal 4:** Quality education
- » **Goal 5:** Gender equality
- » **Goal 6:** Clean water and sanitation
- » **Goal 7:** Affordable and clean energy
- » **Goal 8:** Decent work and economic growth
- » **Goal 9:** Industry, innovation, and infrastructure
- » **Goal 11:** Sustainable cities and communities
- » **Goal 12:** Responsible consumption and production
- » **Goal 13:** Climate action
- » **Goal 16:** Peace, justice, and strong institutions
- » **Goal 17:** Partnerships for the goals

## ESG RATINGS

ESG ratings assess companies on the basis of their environmental, social, and governance performance and are based on standardized analyses by external rating agencies. ESG rating platforms provide an independent indicator of the effectiveness of sustainability management and support stakeholders in investment and procurement decisions.

For voestalpine, **EcoVadis**, the **Carbon Disclosure Project (CDP)**, and the **S&P Global** Corporate Sustainability Assessment (CSA) play a key role. **EcoVadis** is a widely used ESG rating and provides a globally recognized, evidence-based assessment of companies' sustainability performance. EcoVadis analyses actions taken in the four topic areas of the environment, labor & human rights, ethics, and sustainable procurement, with a view to promoting transparency in supply chains. With **CDP**, voestalpine provides its investors and customers with transparency on climate and water performance metrics. **S&P Global** assesses ESG management, strategy and performance in an international capital market comparison. These ratings help stakeholders to classify voestalpine's sustainability risks and opportunities, while increasing the comparability and credibility of the Group's sustainability reporting.

voestalpine's credit ratings as of March 31, 2026 were as follows:

voestalpine AG achieved a high overall score of 75 out of 100 points in the EcoVadis rating and was awarded a silver medal. This makes voestalpine one of the top 15% of the more than 100,000 companies rated worldwide. In addition, various subsidiaries such as voestalpine BÖHLER Edelstahl GmbH & Co KG, voestalpine Railway Systems GmbH (Zeltweg), and voestalpine Turnout Technology Germany GmbH each obtained an EcoVadis Platinum rating (top 1% of all companies worldwide). voestalpine was also recently ranked on CDP's A List (top 4% worldwide) in the Climate category and is therefore regarded as a leading company in terms of managing environmental impacts, environmental transparency, and taking action to achieve an environmentally friendly future. In the CDP category "Water", voestalpine was able to maintain its B rating. In addition to these achievements, voestalpine was again listed in the prestigious Dow Jones "Best-in-Class-Europe-Index" in 2026.



# ENVIRONMENTAL INFORMATION

## DISCLOSURES REQUIRED BY THE EU TAXONOMY REGULATION

### GENERAL INFORMATION ON THE TAXONOMY

Since January 1, 2022, public-interest entities in the EU with more than 500 employees must classify their economic activities in accordance with the EU Taxonomy Regulation and publish the results in their consolidated sustainability reporting (pursuant to the requirements of Section 267a and Section 243b Austrian Commercial Code (UGB)). All economic activities are to be classified as to their environmental sustainability.

When classifying its economic activities, voestalpine at times refers to the FAQs on the application of the EU taxonomy published in the EU Official Journal on October 20, 2023, and to the FAQs from March 5, 2025.

Assessment of alignment with the taxonomy regulations is carried out in a multi-stage process in which it is first determined whether an economic activity is taxonomy-eligible (i.e., in principle covered by the Taxonomy Regulation), and subsequently whether it is also taxonomy-aligned. Economic activities of a company that are not covered by the Taxonomy Regulation are not taxonomy-eligible.

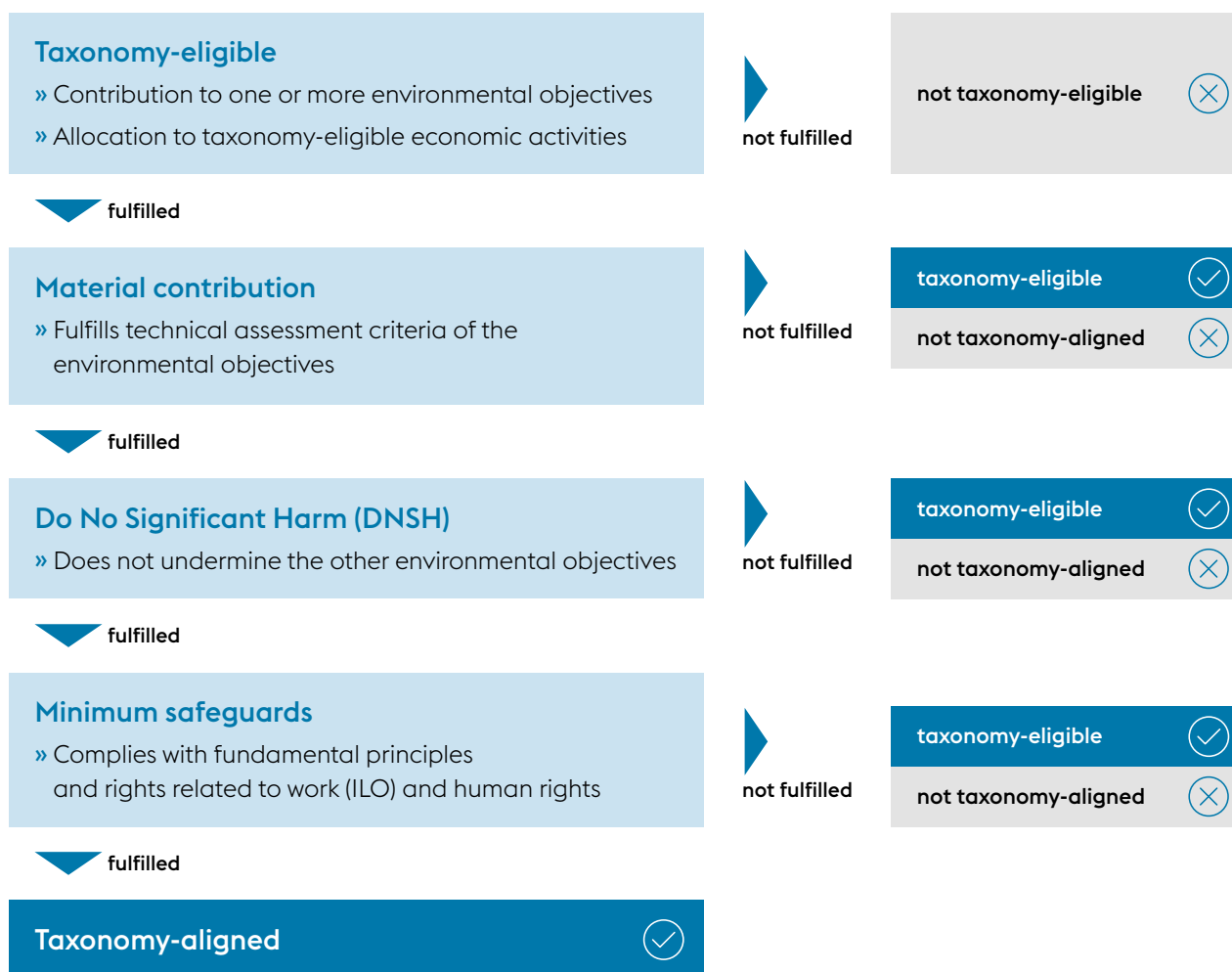
The taxonomy-eligible economic activities must make a significant contribution to at least one of the environmental objectives listed below in order for them to be classified as taxonomy-aligned. In addition, they must not significantly impair the achievement of other environmental goals (Do No Significant Harm; DNSH) and must meet minimum social protection criteria (minimum safeguards), e.g., with respect to occupational safety and human rights.

The EU Regulation identifies six environmental objectives:

- 1. Climate change mitigation**
- 2. Climate change adaptation**
- 3. Sustainable use and protection of water and marine resources**
- 4. Transition to a circular economy**
- 5. Pollution prevention and control**
- 6. Protection and restoration of biodiversity and ecosystems**

In implementing the EU Taxonomy Regulation, voestalpine classified all of its economic activities as related to the “climate change mitigation” objective. This also prevents activities from being counted twice.

## DESCRIPTION OF THE MULTI-STAGE TAXONOMY PROCESS



## IMPLEMENTATION OF TAXONOMY ELIGIBILITY IN THE voestalpine GROUP

The assessment of voestalpine's economic activities with regard to their taxonomy eligibility was carried out for the first time in the business year 2021/22. Environmental goals 3 to 6 were also analyzed and evaluated with regard to their taxonomy eligibility as part of the business year 2023/24 reporting.

A project team comprising personnel from the Group's Finance, Investor Relations, Environment, and Group Sustainability departments along with experts from each division was set up to this end. External experts were also consulted, including technical experts and scientific experts. In addition, clarifying interpretations and statements from European industry associations, such as the rail industry association UNIFE, were taken into account in the assessment.

The implementation process included reviewing the taxonomy eligibility of all Group entities. In addition, ongoing evaluation is carried out with regard to the applicability of the business activities to all environmental objectives.

This analysis identified economic activities of the voestalpine Group as taxonomy-eligible and allocated them to the following categories under the climate change mitigation objective:

» **3.9 Manufacture of iron and steel**

The voestalpine Group engages in steel production based on the blast furnace route in Linz, Austria (Steel Division), and in Donawitz, Austria (Metal Engineering Division). The High Performance Metals Division engages in steel production based on electric arc furnace technology at two plants in Europe (Kapfenberg, Austria; and Hagfors, Sweden) and one in South America (Sumaré, Brazil).

» **6.14 Infrastructure for rail transport**

Worldwide, the voestalpine Group produces material components for railway infrastructure (Metal Engineering Division). These components include rails, turnout systems (from components to pre-assembled complete systems including drives, locking systems, and monitoring equipment), diagnostic and monitoring systems, as well as railway infrastructure services (logistics, rail treatments, rail welding, rail grinding, recycling, etc.).

## DETERMINATION OF TAXONOMY ALIGNMENT

The underlying technical assessment criteria must be fulfilled in order for an economic activity to be classified as “environmentally sustainable” under the taxonomy regulations. These are quantifiable guidelines (environmental targets) on how an activity should be assessed in terms of its contribution to the respective environmental target. The Taxonomy Regulation specifies this significant contribution to the respective environmental target and also defines whether these economic activities cause significant harm to any of the relevant environmental targets. The DNSH criteria (Do No Significant Harm) must therefore also be observed in addition to the significant contribution criterion. This review must provide evidence that a given economic activity does not undermine the other environmental objectives.

voestalpine makes comprehensive contributions to climate change mitigation. As far as the business activities related to the production and downstream processing of steel are concerned, they are generally deemed to contribute substantially to climate change mitigation as long as they fulfill the significant contribution to the environmental goal of climate change mitigation pursuant to Category 3.9 or are lower than the predefined limits on CO<sub>2</sub> emissions. As far as the business activities of voestalpine Railway Systems 6.14 are concerned, they are generally deemed to make a substantial contribution to climate change mitigation as long as they fulfill the technical assessment criteria set forth in that category. The services of voestalpine Railway Systems fulfill the requirement that they are suitable for the use of trains with no direct CO<sub>2</sub> exhaust emissions. Services for rail tracks that are only intended for the transportation of fossil fuels are not included.

A comprehensive DNSH conformity assessment was carried out for the relevant economic activities (3.9, 6.14).

The review of the DNSH criterion regarding the environmental objective “climate change adaptation” was conducted using a simulation-based software tool for identifying, quantifying, and disclosing physical climate risks to the relevant operating sites. A detailed climate risk and vulnerability analysis was performed for all relevant sites based upon this review. The representative concentration pathways RCP 2.6, RCP 4.5, RCP 6.0, and RCP 8.5 of the future scenarios used by the Intergovernmental Panel on Climate Change (IPCC), the assessment reports on climate change by the IPCC, and central

Copernicus services of the European Commission are used as the methodological basis. Adaptation solutions were determined as necessary and implemented based on the findings of this climate risk and vulnerability assessment.

In addition, the voestalpine Group also uses its management systems, such as the environmental management systems certified according to ISO 14001 or EMAS, which are widely implemented in the companies worldwide, to fulfill the DNSH criteria. These systems ensure that environmental impacts are identified and reviewed as to their relevance to a given operating site's local environment and that any adaptation solutions aimed at impact mitigation are developed as necessary.

In particular, these analyses comprise and/or take into account environmental matters such as water (sustainable use and protection of water and marine resources) and biodiversity (protection and restoration of biodiversity and ecosystems).

In order to prevent and reduce environmental pollution, the voestalpine Group has created processes in its companies that ensure the production, use, and marketing of substances in accordance with the national laws on chemicals.

In accordance with the DNSH requirements, certain bans and restrictions on substances based on European specifications must be observed, and substances with properties of very high concern may only be used if no other technically and economically suitable alternative substances or technologies are available on the market. If such a replacement is not yet possible, these substances must be used under controlled conditions. The Group-wide review of the DNSH compliance criteria came to the conclusion that these are already met to a very high degree at the sites carrying out the relevant economic activities. Non-compliant sub-areas were excluded from the calculation of the relevant key figures. Appropriate measures have been introduced to increase the degree of fulfillment on a continuous basis.

The dynamic development of EU Taxonomy Regulations may lead to adjustments to economic activities and adaptations to the assessment criteria in the future.

## MINIMUM SAFEGUARDS

All economic activities that contribute substantially to at least one of the six environmental objectives, do not adversely affect another objective, and fulfill the (social) minimum safeguard requirement are recognized as being environmentally sustainable. In accordance with Article 18 of the EU Taxonomy Regulation, the review of the minimum social protection of workers and compliance with human rights is also the final stage of taxonomy alignment. This serves to ensure that a given economic activity is undertaken in compliance with international human rights standards as well as rules and regulations regarding issues such as bribery, corruption, taxation, and fair competition. The standards specified in Article 18 identify four core topics in regards to which alignment with minimum safeguards is defined.

The following guidelines and standards must be complied with:

- » OECD Guidelines for Multinational Enterprises
- » UN Guiding Principles (UNGPs) on Business and Human Rights
- » ILO Declaration on Fundamental Principles and Rights at Work ("ILO Core Conventions on Labor")
- » International Bill of Human Rights

The Platform on Sustainable Finance (PSF) takes up the following central issues as they apply to social minimum safeguards:

- » Human rights (incl. rights of workers)
- » Avoidance of bribery and corruption
- » Taxation
- » Fair competition

voestalpine has already surveyed the aforementioned topics of the Platform on Sustainable Finance on a Group-wide basis in the past. This is also covered comprehensively in this sustainability statement (see, for example, sections S1, S2 on human rights, and G1 on the topic of anti-corruption).

## SIGNIFICANT CHANGES FROM THE PREVIOUS YEAR

### Initial application of the Omnibus Directive

In the current reporting year, voestalpine has made use of the option of early application of the Omnibus Directive in the context of EU taxonomy reporting (Delegated Regulation 2026/73). The initial application of the Omnibus Directive did not result in any material impacts to the underlying structure of the EU taxonomy indicators; but a materiality threshold of 5% was introduced in relation to the corresponding aggregate indicators for each economic activity. If the analysis of economic activities for revenue, CapEx, and OpEx produced values below 5%, the economic activity in question was classified as an unassessed/immaterial economic activity and therefore not separately reported. According to the Omnibus Directive, the cumulative unassessed/immaterial economic activities may not exceed 10% of the total reported for each KPI (revenue, CapEx, OpEx). In the current business year, CapEx accounts for the highest unassessed/immaterial activities of 4.8%. In addition, the new reporting forms according to the Omnibus Directive were applied for the first time in the reporting year. The change concerns in particular the structured presentation of the revenue, CapEx, and OpEx indicators and aims to simplify and improve the comparability of disclosures.

In addition, cross-cutting activities had no material impact on business activity or the taxonomy KPIs in prior reporting periods and were therefore subject to simplified reporting as taxonomy-non-eligible. However, the new taxonomy templates also require companies to report the percentage shares of the respective KPIs that are classified as immaterial and unassessed. The Omnibus Directive requires immaterial activities to be quantified starting from the current reporting period in order to ensure compliance with the threshold. The voestalpine Group has defined the following as unassessed/immaterial activities: economic activity 3.21 “Manufacturing of aircraft,” economic activity 6.2 “Freight rail transport,” and activities in class 7 “Construction and real estate.” These are not reported separately; they are recorded in the template as immaterial activities. Reporting is thus carried out in accordance with the updated regulatory requirements. voestalpine will continue to monitor developments in regulatory requirements related to the EU Taxonomy Regulation and Omnibus Directive and will adapt its reporting accordingly if necessary.

### Economic activity 6.2. Freight rail transport

The scope of the reported taxonomy-eligible economic activities was reviewed as part of the materiality assessment following the initial application of the Omnibus Directive. It was decided that economic activity 6.2 “Freight rail transport” would no longer be recorded as material in the year under review. This decision is based on the quantitative assessment of the associated performance indicators. The proportions of revenue, CapEx, and OpEx attributable to economic activity 6.2 are each below the materiality threshold of 5% in relation to the Group’s corresponding figures. Against this backdrop, this economic activity is not considered to be material for voestalpine’s EU Taxonomy reporting.

### RESULTS OF THE KPIS

The following summarizes the performance indicators of revenue, CapEx, and OpEx from taxonomy-eligible and taxonomy-aligned economic activities of voestalpine for each environmental target for the business year 2025/26.

2025/26																
KPI	Total	Proportion of taxonomy-eligible activities	Taxonomy-aligned activities	Proportion of taxonomy-aligned activities	Breakdown of taxonomy-aligned activities by environmental objective							Proportion of enabling activities	Proportion of transition activities	Immaterial, unassessed activities <sup>1</sup>	Taxonomy-aligned activities in the previous business year 2024/25	Proportion of taxonomy-aligned activities in the previous business year 2024/25
					Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity						
Revenue	15,063.1	14.8%	2,023.4	13.4%	13.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	13.4%	0.0%	2.4%	1,911.2	12.2%
CapEx	949.7	49.9%	381.8	40.2%	40.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	8.3%	31.9%	4.8%	237.4	20.4%
OpEx	993.0	33.8%	102.1	10.3%	10.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	8.1%	2.2%	2.9%	114.2	10.9%

<sup>1</sup> The immaterial unassessed KPIs stem from economic activities 3.21 Manufacturing of aircraft, 6.2 Freight rail transport, and class 7 Construction and real estate.

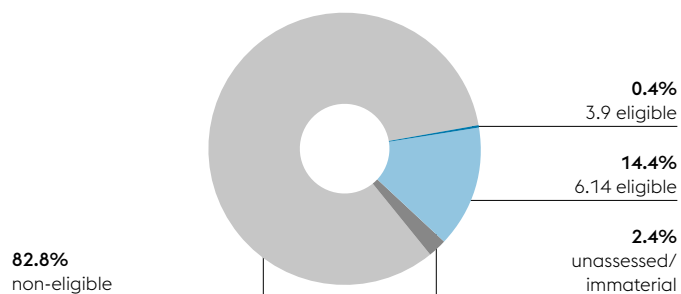
**Taxonomy-eligible/aligned revenue**

Pursuant to the EU Taxonomy Regulation, revenue as per IAS 1.82(a) must be used to determine the taxonomy-eligible revenue. The revenue figures equate to the revenue shown in the Consolidated Income Statement of this Annual Report and thus are used as the denominator for the calculation in the following table. The numerator includes OpEx generated by economic activities covered by the EU Taxonomy Regulation. The current review for compliance in the 2025/26 business year resulted in 13.4% taxonomy-aligned revenue, all of which is attributable to revenue from the railway infrastructure segment.

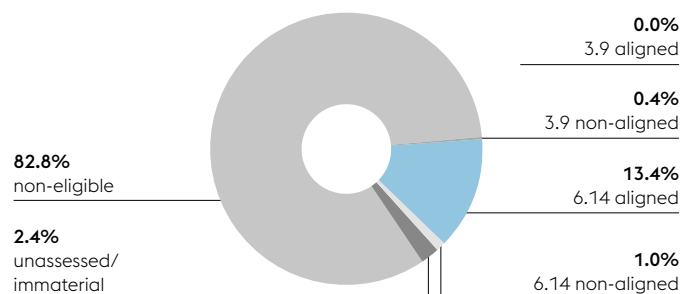
This leads to the following classification for the voestalpine Group:

2025/26		Taxonomy-aligned activities by environmental objective											
Economic activities	Code	Taxonomy-eligible revenue	Taxonomy-aligned revenue	Taxonomy-aligned revenue	Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity	Enabling activity	Transition activity	Taxonomy-aligned share of taxonomy-eligible activities
Manufacture of iron and steel	CCM 3.9/CCA 3.9	0.4%	-	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		T	0.0%
Infrastructure for rail transport	CCM 6.14/CCA 6.14	14.4%	2,023.4	13.4%	13.4%	0.0%	0.0%	0.0%	0.0%	0.0%	E		93.1%
<b>Total alignment by objective</b>					<b>13.4%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>			
<b>Total revenue</b>		<b>14.8%</b>	<b>2,023.4</b>	<b>13.4%</b>	<b>13.4%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>13.4%</b>	<b>0.0%</b>	<b>90.7%</b>

TAXONOMY ELIGIBILITY BY ECONOMIC ACTIVITY



TAXONOMY ALIGNMENT BY ECONOMIC ACTIVITY



### **Taxonomy-eligible/aligned capital expenditure (CapEx)**

Additions to assets—including additions from business combinations to property, plant and equipment; intangible assets; and right-of-use assets under leases—were utilized as the basis for determining the taxonomy-eligible CapEx. Investments via joint ventures, investments in financial instruments as well as additions to goodwill were not considered. Due to the clarification of FAQ 2023/305 item 31, which stipulates that capital expenditure should only be recognized when it is recognized in accordance with the relevant invoicing standards, the additions to advance payments made were excluded from the additions to the CapEx KPI. When the underlying property, plant and equipment/intangible assets are capitalized, the advance payments made on the respective asset are reclassified and also allocated to the additions to the CapEx KPI. This approach may result in a shift between the business years. The difference between the capital expenditure used here in the denominator and the data published in Note D.2. Operating segments in the notes to the Consolidated Financial Statements relates to goodwill additions and the above-mentioned change in advance payments made. The numerator includes CapEx that relates to assets or processes that are associated with taxonomy-eligible or taxonomy-aligned economic activities and are part of the CapEx plan.

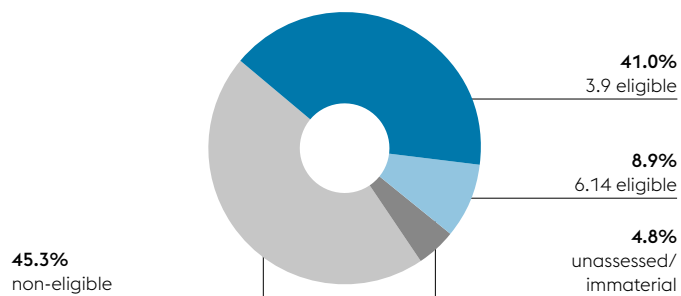
In terms of CapEx, the taxonomy-aligned share is 40.2% (EUR 381.8 million). With greentec steel, voestalpine has developed an ambitious phased plan for low-carbon steel production. As part of the first stage of the phased plan, one green electricity-powered electric arc furnace (EAF) will be built in Linz and one green electricity-powered electric arc furnace system in Donawitz. This will make it possible to produce around 2.5 million tons of CO<sub>2</sub>-reduced steel each year from 2027 following the ramp-up. This first phase of the greentec steel flagship project is also included in the CapEx plan. The individual processes within the scope of future EAF production are to be regarded as independent production units, which will be integrated into the existing plant configurations at the Linz and Donawitz sites. Taxonomy alignment within the context of economic activity 3.9 Manufacture of iron and steel can be determined for electric arc furnaces as an independent production unit with the corresponding technical screening criteria under the environmental objective of climate change mitigation. The CapEx plan has a total volume of EUR 1.5 billion and is expected to be completed in the 2027/28 business year. In the past business year, EUR 292.7 million (2024/25: EUR 134.4 million) was classified as taxonomy-aligned under economic activity 3.9 Manufacture of iron and steel.

The taxonomy-aligned CapEx of EUR 381.8 million is made up of additions to property, plant and equipment and intangible assets of EUR 371.1 million; additions to property, plant and equipment and intangible assets from business combinations of EUR 2.0 million; and the change in advance payments of EUR 8.7 million. The total CapEx of EUR 949.7 million is made up of additions to property, plant and equipment and intangible assets of EUR 1,066.1 million; additions to property, plant and equipment and intangible assets from business combinations of EUR 2.2 million; and the change in advance payments of EUR –118.6 million.

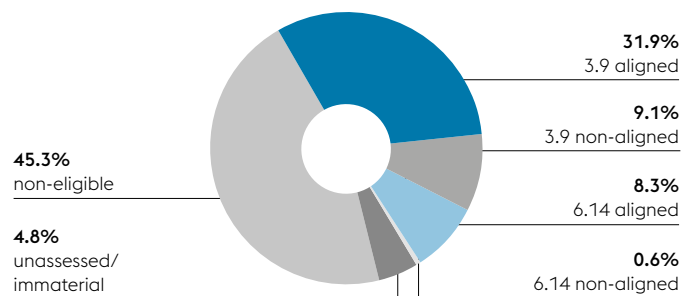
This leads to the following classification for the voestalpine Group:

Economic activities	Code	Taxonomy-eligible CapEx	Taxonomy-aligned CapEx	Taxonomy-aligned CapEx	Taxonomy-aligned activities by environmental objective								Enabling activity	Transition activity	Taxonomy-aligned share of taxonomy-eligible activities
					Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity					
Manufacture of iron and steel	CCM 3.9/CCA 3.9	41.0%	303.3	31.9%	31.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		T	77.8%	
Infrastructure for rail transport	CCM 6.14/CCA 6.14	8.9%	78.5	8.3%	8.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	E		92.8%	
<b>Total alignment by objective</b>					<b>40.2%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>				
<b>Total CapEx</b>		<b>49.9%</b>	<b>381.8</b>	<b>40.2%</b>	<b>40.2%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>8.3%</b>	<b>31.9%</b>	<b>80.6%</b>		

TAXONOMY ELIGIBILITY BY ECONOMIC ACTIVITY



TAXONOMY ALIGNMENT BY ECONOMIC ACTIVITY



### **Taxonomy-eligible/aligned operating expenditures (OpEx)**

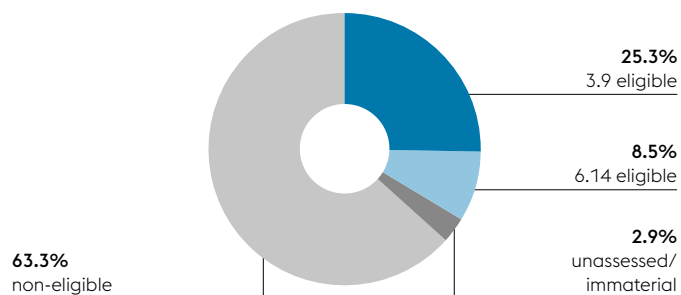
Unlike revenue and capital expenditure, the figure for operating expenditure cannot be taken directly from the annex notes of this Annual Report. This is because only a few expense categories are relevant to the determination of the denominator for the operating expenditure. These include building renovation measures, maintenance and repair of property, plant and equipment, research and development expenses, training expenses for employees, and current leasing expenses. This training expenditure also includes training necessary to operate installations and processes in a sustainable and compliant manner (including occupational safety or production process training in the context of taxonomy-eligible/aligned activities). The numerator includes OpEx that relates to assets or processes that are associated with taxonomy-eligible or taxonomy-aligned economic activities. OpEx from taxonomy-aligned economic activities amounted to EUR 102.1 million. This corresponds to 10.3% of OpEx according to the EU Taxonomy Regulation.

The taxonomy-aligned OpEx of EUR 102.1 million is made up of expenses for research and development of EUR 24.8 million, building renovation measures of EUR 11.2 million, current leasing of EUR 2.1 million, maintenance and repair of property, plant and equipment of EUR 59.5 million, and staff training of EUR 4.5 million. The total OpEx of EUR 993.0 million is made up of expenses for research and development of EUR 221.6 million, building renovation measures of EUR 35.0 million, current leasing of EUR 10.3 million, maintenance and repair of property, plant and equipment of EUR 693.2 million, and staff training of EUR 32.9 million. In addition to training for employees who maintain machinery, training for employees in production is also included in the training expenditure.

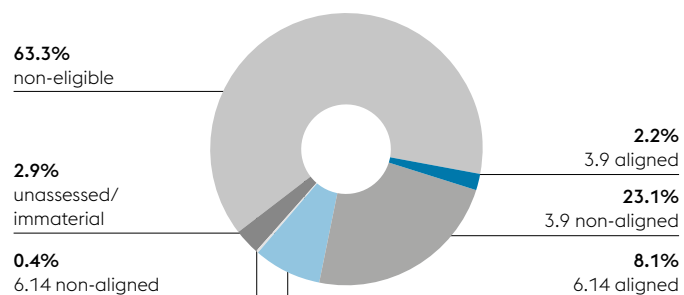
This leads to the following classification for the voestalpine Group:

2025/26		Taxonomy-aligned activities by environmental objective											Taxonomy-aligned share of taxonomy-eligible activities
Economic activities	Code	Taxonomy-eligible OpEx	Taxonomy-aligned OpEx	Taxonomy-compliant OpEx	Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity	Enabling activity	Transition activity	
Manufacture of iron and steel	CCM 3.9/CCA 3.9	25.3%	21.5	2.2%	2.2%	0.0%	0.0%	0.0%	0.0%	0.0%		T	8.6%
Infrastructure for rail transport	CCM 6.14/CCA 6.14	8.5%	80.6	8.1%	8.1%	0.0%	0.0%	0.0%	0.0%	0.0%	E		95.7%
<b>Total alignment by objective</b>					<b>10.3%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>			
<b>Total OpEx</b>		<b>33.8%</b>	<b>102.1</b>	<b>10.3%</b>	<b>10.3%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>8.1%</b>	<b>2.2%</b>	<b>30.5%</b>

#### TAXONOMY ELIGIBILITY BY ECONOMIC ACTIVITY



#### TAXONOMY ALIGNMENT BY ECONOMIC ACTIVITY



## ESRS E1 CLIMATE CHANGE

Climate change is one of the greatest challenges of our time and requires companies to take decisive action. voestalpine is one of Austria's largest emitters of greenhouse gas and consequently needs to drastically curb its emissions. In order to reduce its carbon footprint, voestalpine is focusing on transforming production processes by relying on technological innovations, strategic investments, and close cooperation with customers and suppliers.

With regard to Scope 1 and Scope 2 emissions, a key component of the Climate Transition Plan is the greentec steel climate protection program, which envisages the switch from coal-based blast furnaces to electric arc furnaces (EAF).

In addition to the technological transformation, supplier engagement is also playing an increasingly crucial role. Sustainable sourcing of raw materials and transparent supply chains are key drivers when it comes to bringing down total Scope 3 emissions. This presents both challenges and economic opportunities, particularly in light of the growing demand for low-emission steel products. At the same time, structural change continues to go hand in hand with high investment costs and market risks.

Climate change mitigation, climate change adaptation, and a sustainable energy supply are key challenges of our time. voestalpine takes an active approach toward these issues. Technological innovations, energy efficiency measures, and the gradual transition to renewable energy sources play a decisive role in this regard. Detailed information on the identified impacts, risks, and opportunities (IROs) in relation to climate change mitigation, climate change adaptation, and energy can be found in the following IRO table, which contains specific information on SBM-3.

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Climate change mitigation	● GHG emissions (Scope 1 to 3)	GHG emissions from process-related activities in voestalpine's own operations as well as from the upstream and downstream value chain, such as the procurement of raw materials including iron ore or coking coal, have negative impacts on the environment and society. The vast majority of Scope 1 emissions are generated through the manufacture of steel products at the Group's largest sites in Linz and Donawitz. Scope 2 emissions resulting from the purchase of external energy are significantly lower in comparison. Scope 3 emissions comprise indirect emissions from the upstream and downstream value chain, more than 80% of which are due to the procurement of raw materials.	>>>	●●●●	Environment and society  Local, national, and international authorities  Suppliers
	○ Technological developments & job infrastructure	By expanding its investments in climate-friendly facilities, voestalpine is providing further impetus for decarbonization among other market participants. This creates strong incentives for the development of breakthrough technologies and production innovations that support a low-carbon economy. As a result, in addition to environmentally sustainable infrastructure, new, skilled jobs are being created within the industry's economic environment, positively impacting the environment and climate change mitigation in turn.	>>>	●●●●	Environment and society  Local, national, and international authorities  Suppliers
	! Transition risk: technical transition to low-emission technologies	The shift towards low-emission steel production within the scope of greentec steel requires voestalpine to make considerable investments in new technologies and facilities, which are being made under legal frameworks that remain uncertain to some extent, e.g., uncertainties regarding the design of protective measures such as the Carbon Border Adjustment Mechanism (CBAM) and the future allocation of free allowances. The lack of a uniform, generally accepted definition of green steel also increases the risk of further cost increases. At the same time, the introduction and ramp-up of new production processes are accompanied by operational risks, such as lower efficiencies in the initial phases, which can only be optimized by increasing operational experience, or temporary operational downtime.	>>>	○●●●	Environmental Information  Local, national, and international authorities
	! Transition risk: costs arising from carbon pricing	Carbon pricing mechanisms such as the EU Emissions Trading Scheme (ETS) and the Carbon Border Adjustment Mechanism (CBAM) are creating increasing financial burdens, potentially resulting in competitive disadvantages compared to non-EU competitors, and triggering structural changes in industry, such as the relocation of downstream industries and higher price competition.	>>>	●●●●	Environmental Information  Legislators  Competitors  Customers  Suppliers  Investors
	+ Transition opportunity: increasing the sales volumes of low-emission steel products for voestalpine (especially in sectors relevant to the energy transition) leads to a sustainable stabilization of revenue and operating results (EBIT)	Growing demand and corresponding price premium for low-emission steel. This can also lead to a stronger market position in specialized segments such as rail infrastructure systems, special steels, and high-performance materials.	>>>	●●●●	Competitors  Customers  Investors

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Climate change mitigation	! Transition risk: supply bottlenecks and higher costs for important materials and raw materials	Due to the transformation, demand for critical raw materials such as steel scrap, special metals, and alloys is rising, resulting in a higher risk of supply bottlenecks. voestalpine is facing growing demand that could potentially lead to production delays or quality risks. At the same time, considerable price volatility makes planning more difficult and reduces investment security.	>>>	○●●●	Suppliers
Climate change adaptation	! Physical climate risks	Physical risks can impact voestalpine's business in a number of ways. Material acute physical risks include heavy rain, floods, and landslides. Chronic physical risks include substantial variations in river water levels due to climate change, which can disrupt shipping (e.g., on the Danube) and result in supply chain disruptions.	>>>	○●●●	Customers Suppliers
Energy	! Transition risk: bottlenecks in the energy supply and higher costs for energy procurement	This transition risk for voestalpine comprises bottlenecks in the energy supply at major production sites (in particular Linz and Donawitz), and higher costs for energy pro- curement (renewable and non-renewable sources) due to the energy transition in Europe. This risk is driven above all by volatile energy markets and potential shortages.	>>>	●●●●	Suppliers

**Key**

● Actual positive impact    ● Actual negative impact    ○ Potential positive impact    ○ Potential negative impact    + Opportunity    ! Risk  
 >>> Upstream    >>> Own operations    >>> Downstream    ●●●● < 1 year    ○●●● 1 – 5 years    ○●●○ 5 – 10 years    ○○○● 10+ years

## STRATEGY

### E1-1 – Transition plan for climate change mitigation

voestalpine aims to extensively reduce its greenhouse gas (GHG) emissions across its entire value chain and is committed to lowering its emissions in line with the scientifically validated 2 degree climate target as part of the Science Based Targets Initiative (SBTi). By calendar year 2029, Scope 1 and Scope 2 emissions are to be reduced by 30% and Scope 3 emissions by 25%. The targets set have been tested and validated by the SBTi and align with efforts to limit global warming set forth in the Paris Agreement.

As part of ESRS-compliant reporting, the basis for the calculation of the GHG footprint has been changed from the calendar year to the business year. Accordingly, the emission reduction targets stated in the Climate Transition Plan are presented on a business year basis. However, the targets up to 2029 validated by the Science Based Targets initiative (SBTi) continue to be calculated on the basis of the calendar year.

voestalpine's long-term climate transition plan is divided into three implementation phases: phase 1 (by business year 2029/30), phase 2 (by business year 2035/36), and phase 3 (by business year 2049/50).

It includes a long-term target of limiting global warming to 1.5°C by 2050, while the validated targets in phase 1 by business year 2029/30 follow a "well below 2°C" reduction pathway. voestalpine also pursues the medium-term target of reducing its Scope 1 and Scope 2 emissions by 50% by business year 2035/36 in phase 2, and achieving net-zero emissions in the long term by business year 2049/50 at the latest in phase 3.

In order to achieve the targets set forth in its strategy and the implementation of the Climate Transition Plan, voestalpine is relying on various decarbonization levers that cover the entire value chain and facilitate the transition to lower-emission steel production.

The decarbonization levers are already clearly defined in phase 1. These include industrial electrification, with coal-based blast furnaces replaced by electric arc furnaces (EAF) as the primary measure; the use of renewable energies to reduce CO<sub>2</sub> emissions; the use of raw materials in iron and steel production processes; and improving energy efficiency in production processes and infrastructure. The supply chain is also actively involved in the decarbonization process through measures such as increasingly relying on CO<sub>2</sub>-reduced input materials and optimizing the use of raw materials. For more information please see E1-3.

Phase 2 and phase 3 will be specified in more detail over time, but their primary aims are to extensively transform processes and to fully decarbonize and offset remaining emissions.

The transformation of the production processes in phase 1 of the Climate Transition Plan will facilitate the production of up to 2.5 million tons of low-emission steel, which in turn will enable the sustainable development and adaptation of business models to regulatory requirements and growing market demand for climate-friendly products. Production capacities for low-emission steel will be gradually increased in phases 2 and 3.

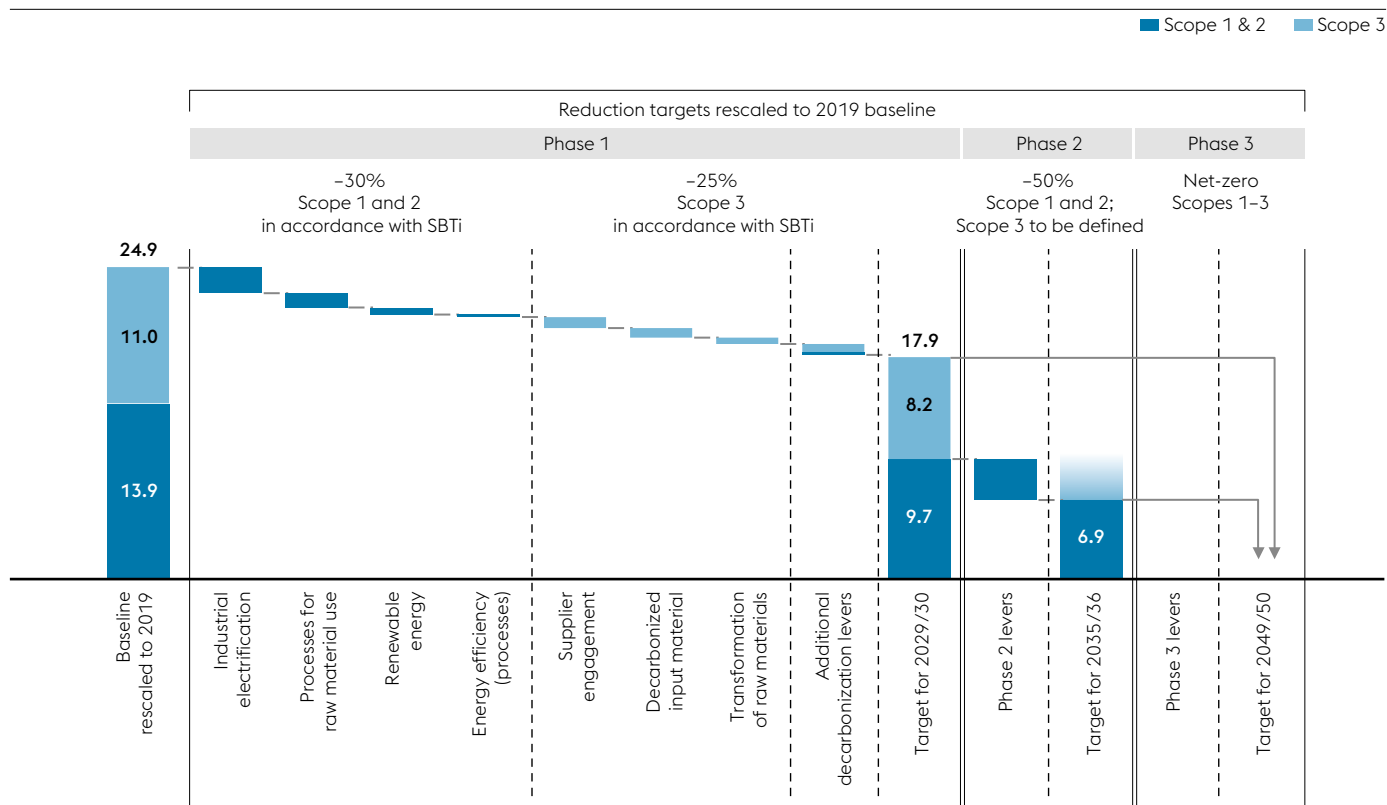
The first stage of the plan and the necessary financial resources, namely a EUR 1.5 billion investment budget, have been approved by the Management Board and Supervisory Board.

The financial resources required to implement phase 1 of the transformation have been taken into account in the medium-term business plan. Over the coming years, voestalpine plans to make targeted investments in low-emission technologies and energy-efficient installations. All required investments are quantified on a regular basis in order to ensure the transformation is economically sustainable. Detailed information on CapEx plans and KPIs can be found under E1-3 and in the chapter on Disclosures required by the EU Taxonomy Regulation.

Emissions data is collected annually, verified externally, and compared against the defined targets as part of this assessment. Technological advancements, legislative changes, and market conditions are accounted for in the assessment in order to adapt and further develop the transition plan if necessary.

The sustainability strategy constitutes an integral part of the Group's strategy, uniting economic, social, and environmental aspects and targets. In order to achieve the objectives set forth in its strategy, voestalpine is relying on central decarbonization levers that facilitate the transition to lower-emission steel production.

## TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION



### Investments and funding supporting climate change mitigation and climate change adaptation

In order to utilize the decarbonization levers as part of its decarbonization sustainability strategy and the EU Taxonomy, voestalpine launched a five-year CapEx plan in the business year 2023/24. Around EUR 1.5 billion has already been approved by the Supervisory Board for the electric arc furnaces in Linz and Donawitz as part of phase 1 of the greentec steel climate protection program, which forms a key component of the company's Climate Transition Plan. Of this, around EUR 0.9 billion had already been invested by the end of the 2025/26 business year (by 2024/25: around EUR 0.5 billion). In addition, further investments for the ongoing replacement of fossil pig iron capacity and CCUS technologies (phase 2) are taken into account in the financial plans for reviewing the recoverability of non-current assets in the affected production units of the Steel and Metal Engineering Division (for details see B.2. Significant judgments and estimates and B.3. Significant accounting policies in the notes to the Consolidated Financial Statements).

The plan focuses on decarbonization levers for all phases, which make a significant contribution to the transformation towards more climate-friendly production. The decarbonization levers required to achieve the Scope 1 to 3 targets in phase 1 are clearly defined and quantified at this stage. As things currently stand, all related steps are progressing as scheduled without any delays. The investments are closely linked to the requirements of disclosure requirement E1-3 and support both the achievement of the long-term climate targets and safeguarding voestalpine's competitive standing in the global market. The decarbonization levers for Scope 1 to 3 emissions in phases 2 and 3 are being specified and defined as part of a continuous development process.

The company has provided significant investments and funding to successfully realize its transition plan for decarbonization. voestalpine has also received funding commitments in the region of EUR 90 million to finance investments in electric arc furnace technology and further research activities. These funds come from the Transformation of Industry program funded by the Austrian Federal Government and support the implementation of central decarbonization levers.

CapEx from taxonomy-aligned activities is used as a key performance indicator to measure the progress of the actions as part of the decarbonization levers. In the current business year, a total of EUR 381.8 million of CapEx was reported as taxonomy-aligned (see also the chapter on Disclosures required by the EU Taxonomy Regulation), where EUR 303.3 million is attributed to the economic activity 3.9 Manufacture of iron and steel, of which, in turn, EUR 292.7 million represents greentec steel investments. No significant CapEx amounts were invested during the reporting period in relation to coal, oil, and gas-related economic activities.

Back in 2024, voestalpine laid the foundation for the issuance of green bonds and other green financing instruments with the launch of the Green Financing Framework. voestalpine was the first European steel company to publish its Green Financing Framework. On October 3, 2024, voestalpine AG issued a fixed interest green bond of EUR 500.0 million. 100% of the proceeds from the issue will be used to refinance or finance sustainable voestalpine projects such as greentec steel.

voestalpine's GHG emissions can primarily be attributed to the continued operation of existing installations, including blast furnace-based steel production. These installations are integrated into existing production processes and represent important assets. Moving away from this technology is therefore technically and economically challenging, but will nevertheless be taken into account in the long-term voestalpine Climate Transition Plan. As phase 1 of the greentec steel project, voestalpine plans to replace two blast furnaces with electric arc furnaces (EAFs) by 2029/30 to reduce GHG emissions. In phase 2, voestalpine plans to replace additional blast furnace-based production capacities at its

crude steel production sites, and consequently the associated GHG emissions. The transformation of the production facilities in phase 2 represents a transitional step towards a 1.5°C reduction pathway. At the Donawitz site, the complete transformation of blast furnace-based production in this phase will reduce the amount of locked-in GHG emissions to a minimum. Net-zero emissions are to be achieved through the transformation of voestalpine's remaining production capacity in phase 3.

The associated transition risks were analyzed by voestalpine; please refer to ESRS 2 IRO-1 for more information. After the above actions have been taken, any remaining GHG emissions have been accounted for in the Climate Transition Plan and do not jeopardize the achievement of the set emission reduction targets.

In addition to the analysis of aspects pertaining to GHG emissions in relation to assets and products, compliance with regulatory criteria related to climate-related benchmarks must also be assessed, with voestalpine falling under the Paris-aligned European Union benchmarks. This disclosure requirement is consistent with the requirements of Commission Implementing Regulation (EU) 2022/2453 and Commission Delegated Regulation (EU) 2020/1818 on climate-related benchmarks.

## IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

### E1-2 – Policies related to climate change mitigation and adaptation

As part of its sustainability strategy, voestalpine is committed to reducing GHG emissions as one of its key focus areas. Specific impacts, risks, and opportunities form the primary focus in order to account for both climate change mitigation and efficient, sustainable energy use. Key concepts include:

- » a Climate Transition Plan for decarbonization
- » the Environmental Policy

The Climate Transition Plan and the Environmental Policy are closely linked to voestalpine's sustainability strategy and support the company's long-term competitive standing. The implementation of the greentec steel program, namely the phased transformation of crude steel production processes, within the framework of the Climate Transition Plan facilitates the sustainable development of the core business by gradually introducing low-emission technologies and optimizing existing processes. This ensures that steel production meets both the regulatory requirements and the increasing market requirements for climate-friendly products. For more information, see chapter E1-1.

The Climate Transition Plan covers the company's own operations (Group-wide production and sales sites worldwide) as well as selected areas of the upstream and downstream value chain, such as purchased energy and procured goods and services (raw materials). The Environmental Policy for the voestalpine Group is an overarching environmental framework that sets out principles and guidelines, including in relation to climate change mitigation and energy. It supports the companies in the implementation of measures to decarbonize their own processes and value chains.

The Climate Transition Plan also supports the increased integration of renewable energies and consequently the reduction of GHG emissions.

The data used for the Climate Transition Plan will be reviewed annually, updated where necessary, and progress towards target achievement evaluated. Environmental and energy management systems are audited and certified at regular intervals.

## POLICY OVERVIEW

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
GHG emissions (Scope 1 to 3) Technological developments & job infrastructure Transition risk: costs arising from carbon pricing Transition opportunity: Increasing the sales volumes of low-emission steel products for voestalpine (especially in sectors relevant to the energy transition) leads to a sustainable stabilization of revenue and operating results (EBIT) Transition risk: technical transition to low-emission technologies	Climate Transition Plan for decarbonization	Own operations and (to a partial extent) upstream and downstream value chain	Management Board and Supervisory Board of voestalpine AG	» Commitment according to SBTi » Communicated in the Annual Report
GHG emissions (Scope 1 to 3)	Environmental Policy	Own operations and upstream and downstream value chain	Management Board and Supervisory Board of voestalpine AG	

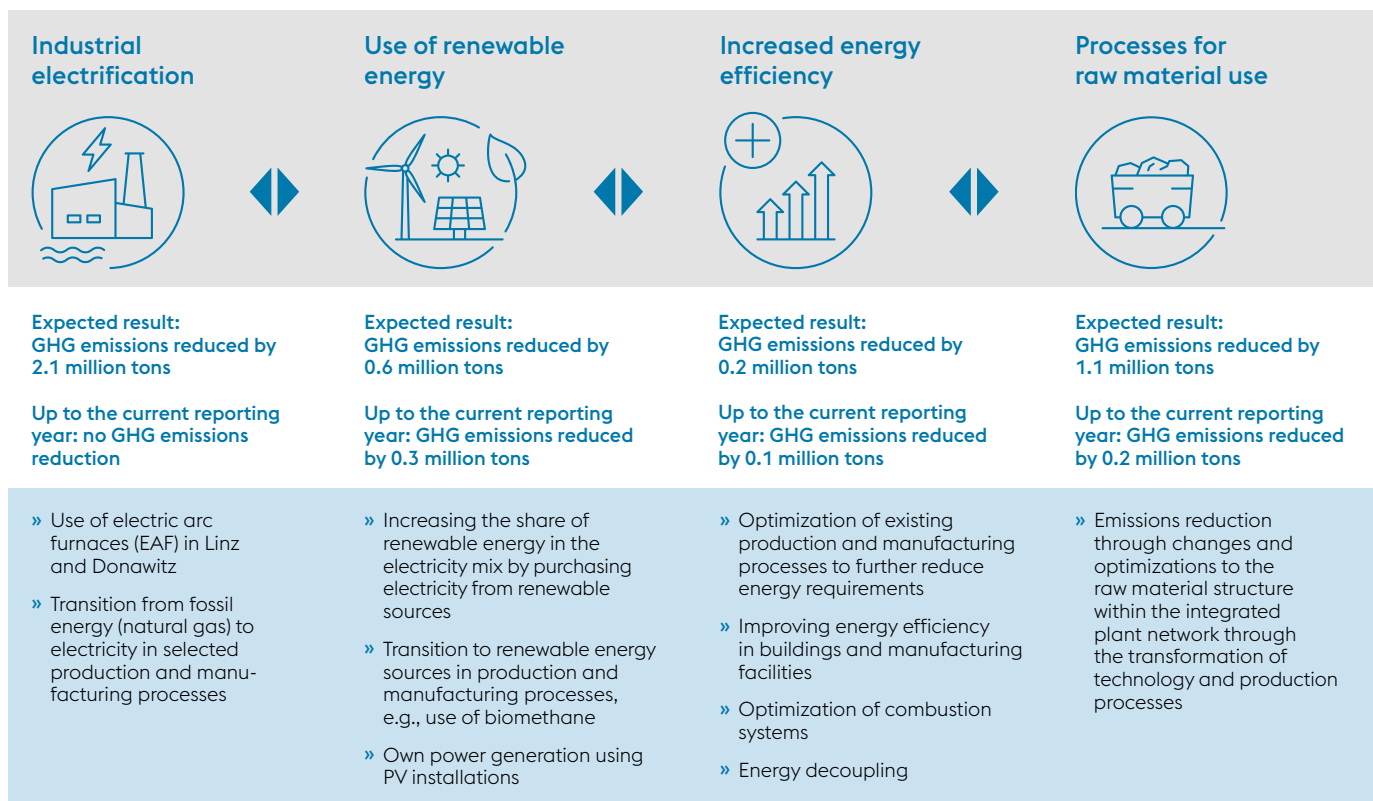
### E1-3 – Actions and resources in relation to climate change policies

As part of the Climate Transition Plan, voestalpine has developed a comprehensive package of actions to reduce Scope 1, 2, and 3 GHG emissions and to lower energy requirements. The decarbonization levers are applied throughout the Group. These actions revolve around the ambitious transformation program greentec steel, which is considered the central and currently most important measure for the decarbonization of the company.

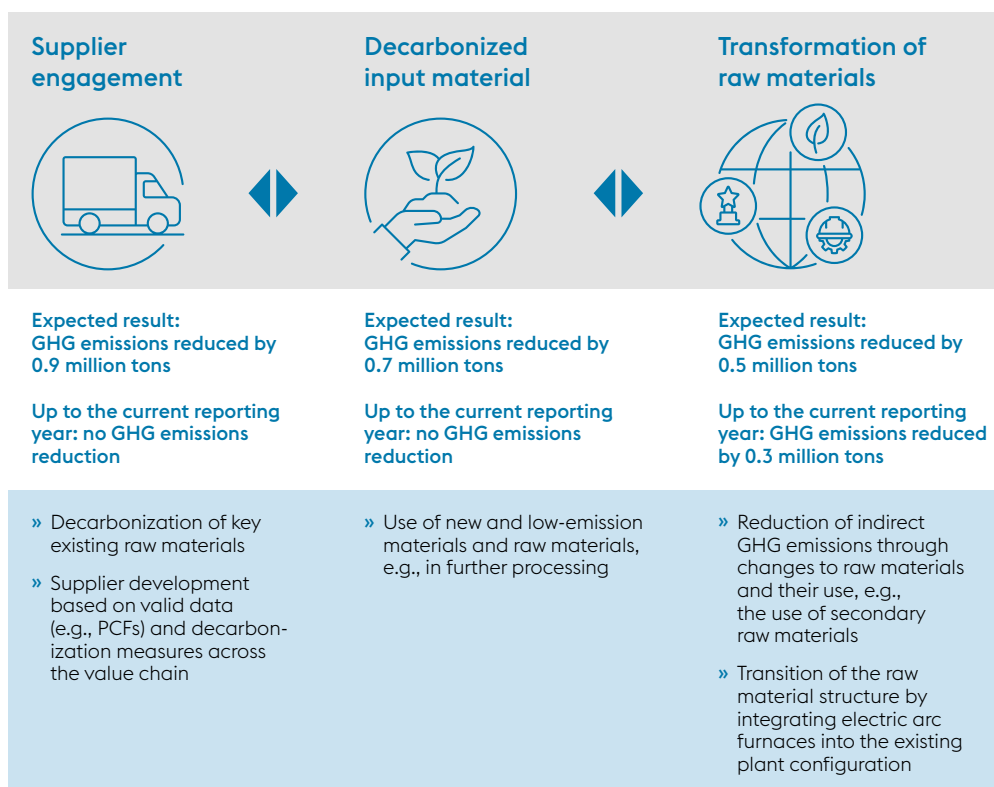
Measures relating to the decarbonization levers had already been implemented by the reporting period. Other key measures, such as the planning and construction of the electric arc furnaces in Linz and Donawitz, are on track and currently being implemented.

## DECARBONIZATION LEVERS

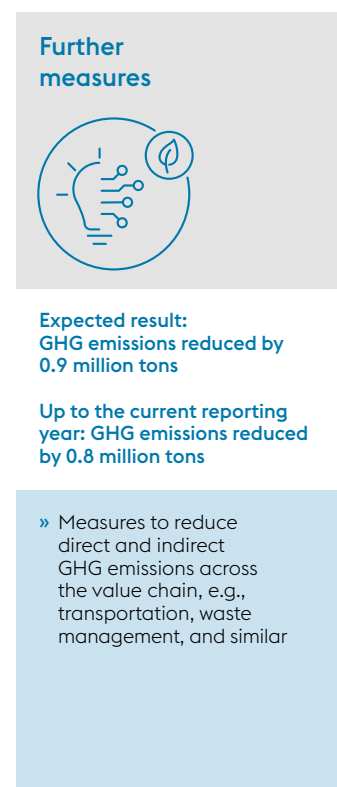
### SCOPE 1 & 2



### SCOPE 3



### SCOPE 1 & 2 & 3



## PHASE 1: SCOPE 1 & 2 DECARBONIZATION LEVERS

One important lever for Scope 1 and 2 emissions is **industrial electrification**, on which significant progress is being made thanks to greentec steel. As part of the first stage of the phased plan, one green electricity-powered electric arc furnace (EAF) will be built at the Linz site and one green electricity-powered EAF system at the Donawitz site. This involves a shift away from carbon-based processes towards an electrified, low-emission production method, accompanied by a fundamental transition in the use of raw materials in crude steel production. Depending on the quality requirements, a mix of input materials consisting of scrap, liquid pig iron, and HBI (hot briquetted iron) will be used. A mix of materials is used, comprising scrap, liquid pig iron, and hot briquetted iron (HBI), with the mix adjusted according to the specific quality requirements. voestalpine sources the necessary HBI primarily from the direct reduction plant in Texas, USA: since 2022, a global steel manufacturer has held a majority stake in the plant; 20% is owned by voestalpine with corresponding supply agreements guaranteed over the long-term. A phased transition of certain production processes from fossil fuels to electric energy sources is also planned, in particular to further reduce dependence on natural gas.

These actions are currently under implementation and the EAFs are scheduled to come into operation from 2027. Phase 1 of the greentec steel program therefore represents a key building block in the CapEx plan with significant capital expenditure of around EUR 1.5 billion, of which EUR 292.7 million has been reported as taxonomy-aligned in the business year 2025/26 (see also disclosures under E1-1). The financial resources for the implementation of the measures under the greentec steel program from phase 1 were approved by the Supervisory Board back in March 2023.

Of the EUR 1.5 billion, EUR 0.9 million had already been invested by the end of the business year 2025/26 (of which EUR 0.4 million was invested during the business year 2025/26). The investment of EUR 0.4 million to implement the measures is included in the Consolidated Financial Statements in the additions to property, plant and equipment and intangible assets (for more information see D.9. Property, plant, and equipment, and D.10. Goodwill and other intangible assets, in the notes to the Consolidated Financial Statements).

Targeted measures to increase the use of low-emission energy sources have been identified under the **renewable energies** lever. These include, in particular, the purchase of green electricity and the use of biomethane. This lever for reducing GHG emissions supports the achievement of voestalpine's climate targets up to the business year 2029/30 initially.

Increasing **energy efficiency** includes targeted measures such as optimizing production processes and improving the energy performance of manufacturing facilities and buildings with state-of-the-art technology. Another key aspect is the optimization of combustion systems and the efficient use of excess energy by decoupling energy for use in other applications, such as supplying heat to adjacent operating units or supplying external grids. Corresponding action is being financed and implemented within the framework of the investment programs and continuous improvement processes.

The lever **processes for raw material use** in Scope 1 and 2 takes into account that the transformation of technology and production processes and the associated adaptation of process control in the integrated plant network result in changes and opportunities for optimization in the structure of raw materials used, which contribute to reducing the GHG emissions.

### **PHASE 1: SCOPE 3 DECARBONIZATION LEVERS**

voestalpine is focusing on taking targeted action within its value chain to bring down indirect Scope 3 GHG emissions by the business year 2029/30. A key decarbonization lever in this regard is supplier engagement, which includes decarbonizing key existing raw materials. This is based on the use of valid data, e.g., Product Carbon Footprints (PCFs) for key raw materials and corresponding decarbonization projects and measures within the value chain, as well as close cooperation with suppliers to reduce emissions (supplier development). The sustainable transformation is also supported by the gradual substitution of primary and secondary raw materials (e.g., scrap and other secondary raw materials), especially with regard to the interdependencies of future production with electric arc furnaces (EAFs).

One key measure for reducing Scope 3 GHG emissions is the planned use of decarbonized input materials, new low-emission raw materials and materials, for example in voestalpine's further processing operations. This approach makes a significant contribution to the achievement of voestalpine's climate targets by the business year 2029/30, as increased reliance on low-emission precursors has the power to reduce the company's carbon footprint along the upstream and downstream value chain.

### **PHASE 2 & 3: SCOPE 1 & 2 DECARBONIZATION LEVERS**

An important lever in phase 2 is the advancement of industrial electrification by continuing with progress on the transformation of steel production processes, for example by expanding production capacities through the electric steel route. Actions for this lever are being developed and put into practice. The use of carbon capture and storage technologies (CCUS) is designed to further reduce process-related emissions. The aim is to accelerate the decarbonization and gradual conversion of remaining energy to renewable energy sources by the business year 2035/36. voestalpine is working on further developing these technologies and applications on an industrial scale, building technical pilot plants, and implementing the latest findings from research and development.

Phase 3 marks the final step towards net-zero emissions by the business year 2049/50. As part of this long-term view, voestalpine is pursuing an approach that is open to different technology types and considers various solutions and technology options while simultaneously creating opportunities for the implementation of future advancements in technology and science to achieve net-zero emissions. Maximum flexibility and economic feasibility play a key role in this regard.

The focus is on replacing the remaining fossil pig iron capacity using fossil-free energy sources such as hydrogen, renewable energy, and the extensive application of CCUS technologies. In this context, future technology scenarios and the associated energy requirements for relevant energy sources were created in the 2025/26 business year.

## ACTIONS TO COUNTER PHYSICAL CLIMATE RISKS

In addition to the actions set forth in the Climate Transition Plan, actions to counter physical climate risks are also currently being implemented. One example is the construction of flood protection at Unterer Tollinggraben, near the Donawitz site. Activities are also being undertaken to counteract the impacts of long-term fluctuations in river levels, such as diversifying supply routes and making adjustments to logistics in the case of low water levels.

## FURTHER ACTIVITIES RELATING TO TRANSITION RISK:

### COSTS ARISING FROM CARBON PRICING

voestalpine counters this risk by means of targeted investment as part of a gradual transformation of production processes. In addition, the Group is focusing on increased differentiation in product quality, flexibility, and service. voestalpine's growing internationalization in high-yield processing fields based on the local for local principle likewise helps to safeguard the company's competitive standing.

## OVERVIEW OF ACTIONS

IROs addressed	Action	Time horizon	Scope of the action	Significant expenditure (if relevant)/other comments
GHG emissions (Scope 1 to 3) Technological developments & job infrastructure Transition risk: costs arising from carbon pricing Transition opportunity: Increasing the sales volumes of low-emission steel products for voestalpine (especially in sectors relevant to the energy transition) leads to a sustainable stabilization of revenue and operating results (EBIT) Transition risk: technical transition to low-emission technologies	Phased implementation for the transformation  (Planned) measures for the Climate Transition Plan (incl. greentec steel)	Implementation by the BY 2029/30, commissioning of EAFs in Linz and Donawitz in 2027  Differentiation between actions taken and planned actions	Own operations and (to a partial extent) upstream and downstream value chain	CapEx greentec steel phase 1: EUR 1.5 billion  Progress according to schedule (ongoing implementation)
Transition risk: supply bottlenecks and higher costs for important materials and raw materials Transition risk: bottlenecks in the energy supply and higher costs for energy procurement	Actions to account for transition risks arising from resource bottlenecks in relation to decarbonization	Ongoing implementation	Own operations  Upstream and downstream value chain to a partial extent	
Physical climate risks	Actions to counter physical risks	Project-dependent	Own operations	CapEx according to investment program  Project-dependent progress

## METRICS AND TARGETS

### E1-4 – Targets related to climate change mitigation and adaptation

voestalpine has been committed to setting ambitious targets for reducing GHG emissions since 2022 as part of the Science Based Targets Initiative (SBTi). The set GHG emission reduction targets are gross targets and do not envisage GHG removals, carbon credits, or avoided emissions. More specifically, voestalpine pursues the near-term target of reducing its Scope 1, 2, and 3 emissions and achieving net-zero emissions in the long term, by the business year 2049/50 at the latest.

In order to achieve this target, voestalpine is initially committed to a science-based 2°C reduction pathway (well-below 2°C) in accordance with the SBTi in phase 1, which aligns with the Paris Agreement and supports global efforts to limit global warming. The current Climate Transition Plan includes a long-term target to limit global warming to 1.5°C up to business year 2049/50 (see E1-1). GHG reductions are to be progressively developed and implemented in phases 2 and 3, moving towards a 1.5°C reduction pathway.

The reduction targets were validated in 2023 on the basis of the general, non-sector-specific SBTi reduction path (absolute contraction approach). The targets up to 2029 validated by the Science Based Targets initiative (SBTi) continue to be calculated on the basis of the calendar year. As part of ESRS-compliant reporting, the basis for the calculation of the GHG footprint has been changed from the calendar year to the business year. Accordingly, the emission reduction targets are presented on a business year basis. A sector-specific decarbonization pathway has not been incorporated to date as there was no relevant pathway available for the steel industry at the time the targets were set. The SBTi is based on established climate and policy scenarios published by the IAMC, IPCC, and IEA in accordance with the Paris Agreement for the validation and development of emission reduction targets. Climate risks were accounted for when the targets were set.

More specifically, the company is committed to reducing its Scope 1 and Scope 2 emissions by 30% and its Scope 3 emissions by 25% by calendar year 2029 as part of the SBTi. The GHG emissions covered and the respective shares of Scopes 1 to 3 are explained in E1-6. voestalpine also pursues the medium-term target of reducing its Scope 1 and Scope 2 emissions by 50% by business year 2035/36 and achieving net-zero emissions in the long term by the business year 2049/50 at the latest. The system boundaries for the targets are the same as those used for GHG accounting under E1-6.

The Scope 2 GHG emissions used to calculate this target were calculated using the market-based methodology.

SBTi's validation of the 2029 reduction target ensured that the targets were consistent with the company's greenhouse gas inventory limits. The targets were subsequently published, including as part of the Carbon Disclosure Project (CDP).

The base year for tracking progress on target attainment was defined as calendar year 2019. Based on the requirements of the GHG Protocol and the SBTi, a standardized procedure for reviewing and, if necessary, adjusting the GHG footprint for the reference year was developed in the reporting period.

An assessment took place on the basis of five defined categories and thresholds to determine whether a rescaling of the initial calculations is necessary, for example due to structural changes in the Group, methodological developments, or new scientific findings. In the business year 2024/25, a rescaling was carried out and the GHG footprint for 2019 was recalculated. voestalpine has verified the validation of existing targets through calendar year 2029 with the SBTi. In business year 2025/26, no rescaling of the GHG footprint for the reference year is necessary.

The set GHG emission reduction targets pertain to the material impacts, opportunities, and risks related to climate change mitigation, climate change adaptation, and reducing the physical climate risks and transition risks to which voestalpine is exposed. Progress has been made on the targets with the divisions and the Head of Sustainability Management at voestalpine.

The GHG emission reduction targets are integrated into the voestalpine Decarbonization Climate Transition Plan, which is explained in detail in E1-1. To achieve the targets, voestalpine has defined various decarbonization levers that cover both Scope 1 and Scope 2 emissions as well as Scope 3 emissions. These levers are also described as part of the Climate Transition Plan under E1-1. Their overall quantitative contribution to achieving the GHG emission reduction targets is described in a detailed list of individual actions under E1-3.

The targets are developed through an ongoing and extensive dialogue with voestalpine's various internal and external stakeholders and reflect their current requirements.

#### TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION (ABSOLUTE VALUES)

Near-term targets In million t CO <sub>2</sub> e	Rescaled in 2019	Business year 2029/30
Scope 1 & 2	13.9	9.7
Scope 3	11.0	8.2

## TARGET: 2°C REDUCTION PATHWAY TARGET (NEAR-TERM SCIENCE BASED TARGETS)

<b>KPI</b>	Reduction of Scope 1 & 2/Scope 3 GHG emissions	
<b>UNIT</b>	in percent	
<b>BASE VALUE</b>	<b>STATUS</b>	<b>TARGET VALUE</b>
13.9 million t Scope 1 & 2 CO <sub>2</sub> e 11.0 million t Scope 3 CO <sub>2</sub> e 2019	13.2 million t Scope 1 & 2 CO <sub>2</sub> e 9.8 million t Scope 3 CO <sub>2</sub> e Business year 2025/26	-30% Scope 1 & 2 -25% Scope 3 Business year 2029/30
<b>Responsibility and monitoring</b>	Management Board and Supervisory Board of voestalpine AG	
<b>Scope</b>	Own operations (Scope 1 & 2); value chain (Scope 3)	
<b>Stakeholders</b>	Environment, society, authorities, suppliers, customers, investors	
<b>IROs addressed</b>	See E1-1 Climate Transition Plan	
<b>Reference to policy</b>	Climate Transition Plan (phased decarbonization plan)	

## TARGET: GHG REDUCTION (MID-TERM TARGET)

<b>KPI</b>	Reduction of Scope 1 & 2 GHG emissions	
<b>UNIT</b>	in percent	
<b>BASE VALUE</b>	<b>STATUS</b>	<b>TARGET VALUE</b>
13.9 million t Scope 1 & 2 CO <sub>2</sub> e 2019	13.2 million t Scope 1 & 2 CO <sub>2</sub> e Business year 2025/26	-50% Scope 1 & 2 Business year 2035/36
<b>Responsibility and monitoring</b>	Management Board and Supervisory Board of voestalpine AG	
<b>Scope</b>	Own operations (Scope 1 & 2)	
<b>Stakeholders</b>	Environment, society, authorities, suppliers, customers, investors	
<b>IROs addressed</b>	See E1-1 Climate Transition Plan	
<b>Reference to policy</b>	Climate Transition Plan (phased decarbonization plan)	

## TARGET: NET-ZERO

<b>KPI</b>	Net-zero (Scope 1, 2, 3)	
<b>UNIT</b>	in million t CO <sub>2</sub> e	
<b>BASE VALUE</b>	<b>STATUS</b>	<b>TARGET VALUE</b>
24.9 million t CO <sub>2</sub> e 2019	23.0 million t CO <sub>2</sub> e Business year 2025/26	Net-zero CO <sub>2</sub> e Business year 2049/50
<b>Responsibility and monitoring</b>	Management Board and Supervisory Board of voestalpine AG	
<b>Scope</b>	Own operations (Scope 1 & 2); global value chain (Scope 3)	
<b>Stakeholders</b>	Environment, society, authorities, suppliers, customers, investors	
<b>IROs addressed</b>	See E1-1 Climate Transition Plan	
<b>Reference to policy</b>	Climate Transition Plan (phased decarbonization plan)	

## E1-5 – Energy consumption and mix

As an energy-intensive company, voestalpine views sustainable energy management as an indispensable part of its corporate strategy. Continuous process optimization has resulted in efficiency gains.

Moving forward, technological transformations, in particular the use of electric arc furnaces (EAF), will help the company make further progress in this regard. A further reduction in fossil fuels is to be achieved on the one hand by increasing the proportion of renewable energies, and on the other hand by further efficiency increases in all production processes. These initiatives contribute both to global climate protection and to securing the company's long-term competitiveness.

The Group's total energy consumption from processes in high climate impact sectors owned and controlled by the company is presented in the table below. The system limits are applied as described in E1-6.

### ENERGY CONSUMPTION AND MIX

	2024/25	2025/26
<b>Fossil feedstocks for metallurgical processes</b>		
0) Use of coal and coal products for metallurgical processes (MWh)	26,672,394	28,181,886
<b>Fossil energy</b>		
1) Fuel consumption from coal and coal products (MWh)	170	199
2) Fuel consumption from crude oil and petroleum products (MWh)	190,994	202,272
3) Fuel consumption from natural gas (MWh)	6,127,776	6,007,526
4) Fuel consumption from other fossil sources (MWh)	7,556	334
5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	942,276	799,250
6) Total fossil energy consumption (MWh)	7,268,772	7,009,581
Share of fossil sources in total energy consumption (%)	82	82
<b>Nuclear energy</b>		
7) Consumption from nuclear sources (MWh)	223,822	171,728
Share of consumption from nuclear sources in total energy consumption (%)	3	2
<b>Renewable energy sources</b>		
8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	67,306	77,839
9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	1,149,954	1,118,933
10) The consumption of self-generated non-fuel renewable energy (MWh)	143,069	167,841
11) Total renewable energy consumption (MWh)	1,360,329	1,364,613
Share of renewable sources in total energy consumption (%)	15	16
<b>Total energy consumption (MWh)</b>	<b>8,852,923</b>	<b>8,545,922</b>
including fossil energy for metallurgical processes (MWh)	35,525,317	36,727,808

The total energy consumption shown includes fossil energy for metallurgical processes, such as reducing agents for the blast furnace process, and energy from fuels.

voestalpine generates electricity in its captive power plants from process gases and uses it to drive both the production process and the downstream processing steps. This enables the Group to cover a large part of its electricity requirements from its own generation. voestalpine currently also uses renewable energy such as hydropower and photovoltaics. Generation from renewable sources amounts to 167,841 MWh (2024/25: 143,069 MWh), while generation from non-renewable sources comes to 1,392,586 MWh (2024/25: 1,469,741 MWh).

#### Energy intensity based on net revenue

voestalpine operates in several high climate impact sectors which incur significant energy consumption and GHG emissions. According to regulation (EC) No 1893/2006 (NACE regulation), these include:

- » C—Manufacturing
- » G—Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles
- » H—Transport and Storage; and
- » L—Real Estate Activities

The revenues of the entire Group were analyzed and compared with revenues in high climate impact sectors in order to assess the energy intensity of the climate-intensive activities.

#### ENERGY INTENSITY BASED ON NET REVENUE

	2024/25	2025/26
<b>Energy intensity per net revenue</b>		
Total energy consumption from activities in high climate impact sectors (MWh)	8,852,923	8,545,922
Net revenue from activities in high climate impact sectors (EUR million)	15,705.0	15,020.9
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/EUR million)	564	569

#### CONNECTIVITY OF ENERGY INTENSITY BASED ON NET REVENUE WITH FINANCIAL REPORTING INFORMATION

In millions of euros	2024/25	2025/26
<b>Energy intensity connectivity</b>		
Net revenue from activities in high climate impact sectors used to calculate energy intensity	15,705.0	15,020.9
Net revenue (other)	38.7	42.2
<b>Total net revenue (Consolidated Financial Statements)</b>	<b>15,743.7</b>	<b>15,063.1</b>

## OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the assumptions and methodology	Information on sources of a high level of measurement uncertainty and information on measurement
E1-5 – Energy consumption and mix	37–38	Total energy consumption	Aggregation of energy consumption from the Group companies collected as part of the Group-wide data collection	Sources of measurement uncertainty relate to the energy collection systems in place at the Group companies and the extrapolation of quarterly figures
E1-5 – Energy consumption and mix	40	Energy intensity	Calculation of energy intensity based on reported total energy consumption and reported net revenue	No further uncertainty

### E1-6 – Gross Scope 1, 2 and 3 and Total GHG emissions

voestalpine calculates its company-specific GHG footprint in accordance with the provisions of the Greenhouse Gas Protocol using primary data, databases (Sphera LCAFE Content Version 2026.1), and value chain information. Modeling is based on recognized methods and is applied Group-wide for production and sales locations worldwide. The evaluation methodology “EF 3.1 Climate change total” was applied for this reporting year.

Data collection, GHG modeling, and the presentation of findings are subject to external verification in accordance with ISO 14064-3. The GHG reporting system limits correspond to the voestalpine consolidation limits (see Consolidated Financial Statements) and include domestic and foreign fully consolidated companies over which voestalpine exercises operational control, taking into account materiality limits for Scope 1 and Scope 2 emissions in GHG accounting. The materiality assessment identified the most significant Scope 3 categories. In the 2024/25 business year, the base year for the GHG reduction targets was rescaled and the GHG footprint for 2019 was recalculated. In business year 2025/26, no rescaling of the GHG footprint for the reference year is necessary.

voestalpine’s GHG emissions have been compiled in consideration of reporting periods that may differ from those of some companies in the value chain. In the case of relevant events and changes affecting emissions between different reporting periods, the corresponding events and changes are taken into account. No significant deviations or changes are known at present.

The GHG footprint of voestalpine AG is divided into three areas referred to as scopes:

- » **Scope 1:** direct emissions from internal or controlled sources
- » **Scope 2:** indirect emissions from the generation of purchased energy, both market and location-based, consumed by the company
- » **Scope 3:** indirect emissions along the upstream and downstream value chain

Scope 3 GHG emissions are largely based on secondary data, as primary data from suppliers or other partners in the value chain is not yet available in the comprehensive quality required. The scopes shown cover carbon emissions and other climate-relevant GHG emissions in accordance with the Kyoto Protocol and the GHG Protocol standard. Accordingly, Scope 3 emissions of consolidated entities are taken into account, whereas Scope 3 emissions of non-consolidated entities are not taken into account. For other entities in the value chain, indirect emissions are taken into account in category 1 “purchased goods.” All emission levels are reported in CO<sub>2</sub> equivalents (CO<sub>2</sub>e).

When compiling voestalpine's GHG footprint, double counting of emissions in Scopes 1 and 3 is avoided.

## GHG EMISSIONS

	Base year 2019	Comparative year 2024/25	Retrospective		Milestones and target years		
			Current BY 2025/26	% N/N-1	Near- term target 2029/30	Long- term target 2049/50	Annual % of target/ Base year
<b>Scope-1-GHG emissions</b>							
Gross Scope 1 GHG emissions (million t CO <sub>2</sub> e)	12.8	12.1	12.6	104			
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	98	98	98	100	9.7		3.0
<b>Scope-2-GHG emissions</b>							
Gross location-based Scope 2 GHG emissions (million t CO <sub>2</sub> e)	0.5	0.61 <sup>1</sup>	0.51	84			
Gross market-based Scope 2 GHG emissions (million t CO <sub>2</sub> e)	1.1	0.78 <sup>1</sup>	0.55	71			
<b>Significant Scope-3-GHG emissions</b>							
Total gross indirect (Scope 3) GHG emissions (million t CO <sub>2</sub> e)	11.0	9.9 <sup>1</sup>	9.8	99			
3.1 Purchased goods and services	9.3	8.3	8.2	99			
3.2 Capital goods	-	0.11 <sup>1</sup>	0.06	55			
3.3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	0.7	0.5	0.5	100			
3.4 Upstream transportation and distribution	0.6	0.6	0.6	100			
3.5 Waste generated in operations	0.03	0.03	0.03	100	8.2		2.5
3.6 Business travel		not relevant					
3.7 Employee commuting		not relevant					
3.8 Upstream leased assets		not relevant					
3.9 Downstream transportation	0.4	0.4	0.4	100			
3.10 Processing of sold products		not relevant					
3.11 Use of sold products		not relevant					
3.12 End-of-life treatment of sold products		not relevant					
3.13 Downstream leased assets		not relevant					
3.14 Franchises		not relevant					
3.15 Investments		not relevant					
<b>Total GHG emissions</b>							
Total GHG emissions (location-based) (million t CO <sub>2</sub> e)	24.3	22.6 <sup>1</sup>	22.9	101			
Total GHG emissions (market-based) (million t CO <sub>2</sub> e)	24.9	22.8 <sup>1</sup>	23.0	101	17.9	Net-zero	

<sup>1</sup> Figure adjusted retroactively (see BP-2 for details).

## SCOPE 1 EMISSIONS

voestalpine's Scope 1 direct greenhouse gas emissions come from its own companies and sites, the majority of which are emitted in Austria at its Linz and Donawitz sites. 98% (2024/25: 98%) of these total Scope 1 emissions come from plants covered by the EU Emissions Trading System (ETS).

During this reporting period, biogenic CO<sub>2</sub> emissions from the combustion of biomethane and biochar, amounting to 0.017 million t CO<sub>2</sub>e, are reported for the first time. Since this information was not available in the previous reporting period, it is not possible to present a comparative figure or year-on-year change for this metric.

Scope 1 emissions at voestalpine are not calculated to include carbon credits or GHG allowances.

## SCOPE 2 EMISSIONS

voestalpine uses two methods to calculate Scope 2 GHG emissions:

### » Location-based method:

based on average emission factors for energy generation in specific geographic regions according to the GHG Protocol Scope 2 Guidance (Glossary, 2015).

### » Market-based method:

uses specific emission factors for the producers from which the company purchases electricity. Evidence is obtained through guarantees of origin or certificates for renewable energies.

The share of market-based Scope 2 GHG emissions covered by contractual instruments is 61% (2024/25: 32%). This change is due to the adjustment of the baseline relative to the previous year because of the change in the Group's structure. Contractual instruments from energy suppliers that meet the requirements of the GHG Protocol were taken into account, including guarantees of origin and declared electricity mix information.

Databases based on average energy generation data at national and partly sub-national level were used to calculate Scope 2 location-based GHG emissions.

Direct biogenic GHG emissions resulting from biomass combustion but not included in Scope 2 are reported separately in Scope 1. A breakdown of the biogenic CO<sub>2</sub> content is not possible for the emission factors used to calculate Scope 2 GHG emissions and is therefore not included in the report.

Scope 2 emissions in voestalpine are not calculated to include carbon credits or GHG allowances.

## SCOPE 3 EMISSIONS

voestalpine conducts an evaluation of all Scope 3 categories to identify the relevant indirect GHG emissions in its value chain on a regular basis. This evaluation was once again performed in the business year 2025/26. Categories that are not relevant under the Greenhouse Gas Protocol are therefore not included in the GHG footprint. In the business year 2025/26, this concerned the following categories:

- » 3.6 Business travel
- » 3.7 Employee commuting
- » 3.8 Upstream leased assets
- » 3.10 Processing of sold products
- » 3.11 Use of sold products
- » 3.12 End-of-life treatment of sold products
- » 3.13 Downstream leased assets
- » 3.14 Franchises
- » 3.15 Investments

### Supplier engagement improves Scope 3 data quality

As part of supplier engagement, key existing raw materials are to be decarbonized. This takes place on the basis of validated data and decarbonization projects and measures. To achieve this, verified product carbon footprints (PCFs) are collected from suppliers and accounted for in the GHG footprint. Currently, GHG accounting is primarily based on secondary data from databases that do not record a reporting period. The proportion of primary data is still low (less than 1% in the business year 2025/26) and is preferably obtained from carbon footprints, for example from verified environmental product declarations (EPDs). The data published in Life Cycle Assessments (LCA) and verified externally are valid for up to five years.

During the reporting period, no releases of biogenic CO<sub>2</sub> emissions from the biomass combustion or bioremoval were reported or brought to the attention of voestalpine for the calculation of GHG emissions along the value chain.

When calculating Scope 3 emissions, voestalpine was not notified or made aware of any carbon credits or GHG allowances. These were therefore not included.

The following table shows the GHG intensity per net revenue and the connectivity of GHG intensity. The total net revenue corresponds to the revenue in D.1. Revenue in the notes to the Consolidated Financial Statements.

### GHG INTENSITY PER NET REVENUE

	2024/25	2025/26
Total GHG emissions (location-based) per net revenue (t CO <sub>2</sub> e/EUR million)	1,435.5 <sup>1</sup>	1,520.3
Total GHG emissions (market-based) per net revenue (t CO <sub>2</sub> e/EUR million)	1,448.2 <sup>1</sup>	1,526.9
Net revenue used to calculate GHG intensity: Total net revenue (Consolidated Financial Statements) (EUR million)	15,743.7	15,063.1

<sup>1</sup> Figure adjusted retroactively (see BP-2 for details).

## OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the assumptions and methodology	Resulting degree of accuracy	Where applicable: planned actions to improve accuracy
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	44, 46-52	GHG footprint	The GHG footprint is calculated on the basis of the consumed volumes of energy, materials, and raw materials recorded as part of the Group data collection, as well as secondary data (emission factors of databases and energy suppliers) according to the GHG Protocol	High (+/-3%)	Ongoing development and expansion of data collection and evaluation
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	48a	Scope 1 emissions	This parameter is calculated by aggregating the Scope 1 emissions of the individual companies, data which is requested as part of a Group-wide data collection. If carbon monitoring takes place according to ETS, the results are compared using monitoring evidence or using the calculation based on fossil fuel use with the inclusion of relevant emission factors	High (+/-3%)	Ongoing development and expansion of data collection and evaluation
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	AR 43c	Biogenic CO <sub>2</sub> emissions from biomass combustion or bioremoval	The use of biomass as a source of energy is recorded as part of Group-wide data collection, and carbon emission factors are calculated on the basis of CO <sub>2</sub> emissions	High (+/-3%)	Ongoing development and expansion of data collection and evaluation
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	48b	Percentage of Scope 1 GHG emissions covered by EU ETS	Aggregation of Scope 1 emissions of all Group companies covered by the EU ETS	High (+/-3%)	-
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	49	Scope 2 emissions (location- and market-based)	Scope 2 emission factors (location- and market-based) are calculated on the basis of the energy purchases reported as part of Group-wide data collection, as well as the reported emission factors of energy suppliers or regional emission factors from data bases	High (+/-3%)	Ongoing development and expansion of data collection and evaluation
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	51	Total Scope 3 emissions	Scope 3 emissions are determined on the basis of the input volumes of material flows, raw materials, and energy carriers reported as part of Group-wide data collection and using secondary background data sets (emission factors)	High (+/-3%)	Ongoing development and expansion of data collection and evaluation
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	53-55	Greenhouse gas intensity	Calculation of greenhouse gas intensity is based on reported total greenhouse gas emissions for the reported net revenue	High (+/-3%)	-
		Net revenue to calculate GHG intensity	Net revenue according to the Consolidated Financial Statements	High (+/-3%)	-

## ESRS E2 POLLUTION

As part of its double materiality assessment, voestalpine has identified its material impacts, risks, and opportunities related to air, water, and soil pollution. A detailed description of the testing procedures applied for sites and business activities along the value chain and the engagement of affected communities can be found in ESRS 2 IRO-1 E2.

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Air pollution	● NO <sub>x</sub> , SO <sub>x</sub> , and dust emissions	Due to the production processes and raw materials used, air pollutants such as SO <sub>x</sub> , NO <sub>x</sub> and dust are emitted despite mitigation measures. These emissions contribute to air pollution and lead to the pollution of ecosystems	>>>	●●●●	Environment and society  Local, national, and international authorities

**Key**

● Actual positive impact    ● Actual negative impact       Potential positive impact       Potential negative impact    + Opportunity    ! Risk  
 >>> Upstream    >>> Own operations    >>> Downstream    ●●●● < 1 year    ●●●● 1 – 5 years    ●●●● 5 – 10 years    ●●●● 10+ years

## IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

### Disclosure Requirement E2-1 – Policies related to pollution

Active environmental protection, which encompasses, in particular, the prevention and reduction of environmental pollution, has been firmly embedded in voestalpine’s corporate principles and the Group’s Environmental Policy for decades.

The Environmental Policy is an overarching framework that defines principles and guidelines. The environmental management systems are incorporated in the policy and translate the requirements set forth therein into concrete measures at the operational level.

In order to effectively manage the negative impacts related to pollution, voestalpine relies on locally implemented environmental strategies. To facilitate this, environmental management systems (EMS) have been implemented at the production sites in accordance with the recognized EMAS, ISO 14001, or equivalent regulations. Environmental management systems make it possible to effectively roll out site-specific actions and targets at short notice.

A corresponding environmental management system is already in place at the majority of companies that have a significant impact on the environment from a Group perspective. At present, this covers 90% (2024/25: 86%) of the manufacturing companies responsible for 99% (2024/25: 98%) of voestalpine’s production volume.

The environmental management systems define how the individual companies can continuously improve their environmental performance, comply with legal and other requirements, and achieve their site-specific environmental targets in accordance with the Plan-Do-Check-Act (PDCA) approach.

Preventing and reducing negative impacts on air, water, and soil quality (e.g., NO<sub>x</sub>, SO<sub>x</sub>, and dust emissions) is one of the core tasks handled by the environmental management systems in place at voestalpine production companies. One of the main tools employed in this regard is comprehensive pollutant monitoring, which is conducted both in line with and beyond the thresholds of regulatory requirements, in order to enable process manager to take action at an early stage in the process management system when necessary.

The installations for preventing and reducing adverse environmental impacts meet the national requirements for the current state of the art (such as in the European Union for large plants according to the BAT documents under the Industrial Emissions Directive) and can also meet additional requirements. Like all process plants, they are inspected and maintained on a regular basis. Periodic inspections are also carried out by the authorities, resulting in adjustments and the development of new plans for minimizing pollutants, if necessary with the involvement of external experts.

The Group relies on trained personnel and internal experts to identify problematic situations at an early stage and take appropriate action in response. In the case of extraordinary events, local emergency plans and protocols are in place to facilitate a rapid response and appropriate action. On-call services are available 24 hours a day to coordinate the necessary procedures in the event of an incident and to facilitate the involvement of external support and authorities if necessary.

## POLICY OVERVIEW

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
NO <sub>x</sub> , SO <sub>x</sub> , and dust emissions	Environmental Policy	Own operations	Management boards of the companies	» For implemented environmental management systems: regular compliance check as part of the PDCA cycle and engagement of authorities, experts, and direct representatives of neighboring communities as necessary

## E2-2 – Actions and resources related to pollution

For years, voestalpine has been committed to comprehensive and active climate change mitigation and has continuously undertaken activities to prevent and reduce emissions. As one of these activities, comprehensive environmental impact assessments are carried out at voestalpine sites on an ongoing basis. Based on the findings from the assessments, investments and expansion projects are pursued to improve existing environmental protection facilities. These activities have led to continuous reductions in emissions in recent years. Further information on this topic can be found in the published environmental reports for the individual companies.

A large number of activities aimed at protecting the environment are carried out every year. These range from modifying the process control system to overhauling and expanding existing installations, and completely rebuilding environmental protection systems such as pollutant separation systems.

At voestalpine, measures to reduce pollution are particularly relevant at the local level, as the main sources of environmental pollution are site-specific and largely depend on different production processes and plant configurations.

The process defined by the environmental management systems envisages a continuous assessment of the current environmental situation and the derivation of necessary measures for environmental protection. Regular reviews and evaluations at site level help to ensure that measures are implemented quickly and maximize their impact in line with local requirements.

Alongside ongoing progress monitoring by the management systems, additional potential improvements are discussed with the external experts during official inspections.

When evaluating possible measures, the specialist departments also involve external experts from public authorities, plant designer, and technology suppliers, as well as the company's own research departments. Measures under consideration are often reviewed in comparison with the specifications of the European Commission on the state of the art.

Activities related to environmental protection are primarily pursued through two approaches:

» **Process-integrated activities:**

Adjusting process sequences or making adaptations (e.g., burner replacement) to prevent or reduce emissions.

» **End-of-pipe technologies:**

Preventing the emission of already generated pollutants into the environment, or treating the pollutants prior to emission.

The following table explores examples of activities related to implementation of the state-of-the-art and outlines the negative impacts and mitigation measures along with example projects.

State-of-the-art activity	Emissions/ substances	Mitigation activity
<b>Iron and steel manufacturing</b>		
	Air emissions: Dust	<ul style="list-style-type: none"> <li>» Extraction systems for preventing and reducing diffuse dust emissions</li> <li>» voestalpine Stahl GmbH example: installation of an additional extraction and filtration system in the blast furnace area to reduce diffuse dust emissions.</li> <li>» Complete encapsulation and containment of plant processes to prevent dust emissions</li> </ul>
	Air emissions: NO <sub>x</sub>	<ul style="list-style-type: none"> <li>» Exhaust gas recirculation in the sinter plant</li> <li>» Selective catalytic reduction (SCR) to reduce nitrogen oxide emissions</li> </ul>
	Air emissions: SO <sub>x</sub> (SO <sub>2</sub> )	<ul style="list-style-type: none"> <li>» Desulphurization of coke oven gas</li> <li>» SO<sub>2</sub> reduction by injecting adsorbent in the sinter plant exhaust gas</li> </ul>
	Water emissions: Heavy metals and total suspended solids	<ul style="list-style-type: none"> <li>» Separate collection of different wastewaters</li> <li>» On-site waste water treatment with neutralization and heavy metal precipitation, as well as sand filter systems</li> <li>» Uddeholms AB example: Expansion of water management in the steelworks area to further reduce zinc emissions</li> </ul>
<b>Metal processing</b>		
	Air emissions: Dust	<ul style="list-style-type: none"> <li>» Extraction systems to catch dust emissions</li> <li>» Dust separation in an electrostatic precipitator or fabric filter</li> </ul>
	Air emissions: NO <sub>x</sub>	<ul style="list-style-type: none"> <li>» Optimized process control of heating furnaces</li> <li>» Avoidance of false air intake through optimized design of the furnace chambers</li> </ul>
	Water emissions: Heavy metals and total suspended solids	<ul style="list-style-type: none"> <li>» Separate collection of different wastewaters</li> <li>» On-site waste water treatment with neutralization and heavy metal precipitation, as well as sand filter systems</li> <li>» voestalpine Grobblech GmbH example: ongoing expansion of the water management system with a new cleaning facility to further reduce the total suspended solids</li> </ul>
<b>Power plant engineering</b>		
	Air emissions: NO <sub>x</sub>	<ul style="list-style-type: none"> <li>» Low-NO<sub>x</sub> burner technology</li> <li>» Air staging</li> <li>» Selective catalytic reduction of nitrogen oxides (SCR)</li> <li>» voestalpine Stahl GmbH example: installation of a DeNO<sub>x</sub> system in the power plant area to reduce NO<sub>x</sub> emissions</li> </ul>
	Air emissions: CO	<ul style="list-style-type: none"> <li>» Optimized process control</li> <li>» LAMBDA air control for complete combustion</li> <li>» Combustion air preheating</li> </ul>
	Air emissions: SO <sub>x</sub> (SO <sub>2</sub> )	<ul style="list-style-type: none"> <li>» Pre-desulphurization of process gases (coke oven gas)</li> </ul>
	Water emissions: Input of pollutants	<ul style="list-style-type: none"> <li>» Separate collection of water and wastewater streams</li> <li>» Dry, water-free waste gas treatment systems</li> </ul>

The set activities are implemented as part of an overarching package of measures and cover the scope of the company's own operations. The upstream and downstream value chain is not taken into consideration in this context.

## OVERVIEW OF ACTIONS

IROs addressed	Action	Time horizon	Scope of the action	Significant expenditure (if relevant)/other comments
NO <sub>x</sub> , SO <sub>x</sub> , and dust emissions	Package of measures to reduce the release of emissions into the air, water, and soil	Project-dependent	Own operations (sites subject to IED or comparable legislation outside the EU)	<p>CapEx of EUR 35.4 million and planned CapEx through the business year 2030/31 of EUR 65.5 million (planned CapEx only includes actions exceeding EUR 5 million)</p> <p>Indirect consideration of interests through implementation of regulatory requirements (environment, society)</p>

## METRICS AND TARGETS

### E2-3 – Targets related to pollution

voestalpine employs individual targets at each site to manage site-specific environmental impacts. Due to the high number of operational sites with different process and production processes, as well as complex plant networks, the environmental impacts and, accordingly, the local targets differ considerably from site to site. Group-wide standardization or central control of environmental targets is therefore not feasible at present. Accordingly, no quantifiable and results-driven Group environmental targets are currently defined or planned. Nevertheless, the pertinent legal requirements are observed and effectiveness is continuously ensured through the environmental management system and reviewed through regular external audits.

### E2-4 – Pollution of air, water, and soil

In order to ensure compliance with the legal requirements and to make the processes as efficient as possible, comprehensive monitoring systems have been implemented to track pollutant emissions at the Group's production sites. These include continuous and periodic measuring systems that detect emissions in the air, water, and waste water. Pollutant analyses are then carried out by accredited, in-house, or external laboratories in line with established standards and methods. In certain cases, for instance when process gases are burned, emission levels are recorded using the stoichiometric combustion calculation based on the composition of the measured process gas. This approach is recognized in the field and comparable to direct emission measurement. Due to the small volume of corresponding calculated emission data, the resulting level of uncertainty is very low.

The emission levels reported by the Group companies refer to the calendar year and are projected over the course of the business year using a reference factor, namely the production forecast for the business year. Due to the fact that plant operating methods remain consistent throughout the year, it can be assumed that the extrapolated figures are highly accurate. A back test using actual data has confirmed their accuracy.

At Group level, a survey of all metrics relevant to the environment takes place on an annual basis via an online reporting system. Topic-specific data are collected by local experts. A high number of production sites are already subject to comprehensive legal reporting requirements, such as the European Pollutant Release and Transfer Register Regulation (E-PRTR). Group-wide data collection takes place on the basis of these requirements, thereby ensuring high data quality of this raw data along with verification by external control bodies.

The following table provides an overview of the volumes of pollutants released into the air and water by voestalpine in the business year 2025/26 and a corresponding year-on-year comparison. Year-on-year differences in total emissions are caused by fluctuations at the individual production sites. In particular, production increases (e.g., zinc and compounds) or production decreases, changes in the pollutant measurement surveys (e.g., measurements of partially fluorinated HFCs during the reporting period indicated small leaks), and the attainment of the specified reporting thresholds (e.g., for lead and lead compounds (Pb)) have an impact on emissions.

## OVERVIEW OF EMISSIONS

In tons	Air		Water		Soil	
	2024/25	2025/26	2024/25	2025/26	2024/25	2025/26
Carbon monoxide (CO)	159,089	172,481	-	-	-	-
Sulfur oxides (SO <sub>x</sub> /SO <sub>2</sub> )	5,011	5,264	-	-	-	-
Nitrogen oxides (NO <sub>x</sub> /NO <sub>2</sub> )	4,340	3,581	-	-	-	-
Particulate matter (PM10)	342	367	-	-	-	-
Methane (CH <sub>4</sub> )	182	287	-	-	-	-
Chlorine and inorganic compounds (as HCl)	20	35	-	-	-	-
Lead and lead compounds (Pb)	0.30	0.87	0.65 <sup>1</sup>	0.36	-	-
Mercury and mercury compounds (Hg)	0.28	0.29	0.004	0.004	-	-
Cadmium and cadmium compounds (Cd)	0.026	0.042	-	-	-	-
Hydrofluorocarbons (HFCs)	35	0.81	-	-	-	-
Partly halogenated hydrochlorofluorocarbons (HCFCs)	-	1.4	-	-	-	-
Chromium and chromium compounds	0.10	-	1.1 <sup>1</sup>	0.77	-	-
Zinc and zinc compounds	5.5	8.0	8.9 <sup>1</sup>	6.8	-	-
Benzene	5.3	4.9	-	-	-	-
Polycyclic aromatic hydrocarbons (PAHs)	0.14	0.14	0.030 <sup>1</sup>	0.022	-	-
Fluorine and inorganic compounds (as HF)	6.7	-	-	-	-	-
Total nitrogen	-	-	304	323	-	-
Total phosphorus	-	-	- <sup>1</sup>	-	-	-
Nickel and nickel compounds	-	-	1.2 <sup>1</sup>	0.86	-	-
Naphthalene	-	-	0.01	0.01	-	-
Phenols (as total C)	-	-	194	255	-	-
Total organic carbon (TOC) (as total C or COD/3)	-	-	432	473	-	-
Cyanides (as total CN)	-	-	0.84	0.73	-	-
Fluorides (as total F)	-	-	82 <sup>1</sup>	90	-	-
Arsenic and arsenic compounds	-	-	0.062 <sup>1</sup>	0.0069	-	-
Copper	-	0.32	0.15 <sup>1</sup>	0.12	-	-
Chloroalkanes	-	-	0.015 <sup>1</sup>	0.016	-	-
Trichloromethane	-	-	0.019 <sup>1</sup>	0.021	-	-
PCCD + PCDF (dioxins + furans) in kilograms	0.0005 <sup>1</sup>	0.0005	-	-	-	-

<sup>1</sup> Figure adjusted retroactively (see BP-2 for details).

## OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the assumptions and methodology	Information on sources of a high level of measurement uncertainty and information on measurement
E2-4 – Pollution of air, water, and soil	28a	Emissions released into the air, water, and soil (non-GHG)	Only includes emissions from installations that exceed the thresholds of the European Pollutant Release and Transfer Register (E-PRTR Regulation). Emission levels are based on an evaluation over the course of the CY and monitoring requirements, which are converted to the business year for reference factors	Estimate for individual quarters

## ESRS E3 WATER AND MARINE RESOURCES

The protection of water and marine resources is one of the key environmental fields of action. voestalpine puts a great amount of effort into addressing the identified impacts of its business activities. In particular, its focuses on responsible water withdrawal and the efficient use of water resources. Technological optimizations, the closed-loop circulation of cooling water, and forward-looking water management play a central role in this regard.

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Water	● Water withdrawal, water consumption	voestalpine draws significant quantities of cooling water from running waters, as water is essential for stable production processes, particularly for cooling purposes in pig iron and steel production, in melting processes, and during heat treatment. The materiality of this factor arises from the central importance of this resource, declining water availability due to climate change, and the potential thermal stress on the water bodies. In the upstream value chain, water is also essential for the provision and processing of certain raw materials	>>>	●●●●	Local residents  Environmental Information  Local, national, and international authorities  NGOs and NPOs

### Key

● Actual positive impact    ● Actual negative impact       Potential positive impact       Potential negative impact    + Opportunity    † Risk  
 >>> Upstream    >>> Own operations    >>> Downstream    ●●●● < 1 year    ●●●● 1 – 5 years    ●●●● 5 – 10 years    ●●●● 10+ years

## IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

### E3-1 – Policies related to water and marine resources

Water is an indispensable resource for voestalpine’s production processes. It is primarily used for cooling purposes in pig iron and steel production, in melting processes, and in heat treatments. Against the backdrop of increasing environmental and regulatory requirements, sustainable, structured, and systematic water management activities are crucial, both when it comes to minimizing impacts and to ensuring long-term production capacity.

The Group’s Environmental Policy is an overarching framework that defines principles and guidelines. Certified environmental management systems (e.g., according to ISO 14001 or EMAS) are rolled out at all major production sites according to this policy, to ensure compliance with local targets (see also E3-3). The current coverage is provided in chapter E2-1. These environmental management systems incorporate, where necessary, local water management plans, which are maintained and further developed by specialized environmental departments on an ongoing basis. As described in detail in chapter E2-1, the Plan-Do-Check-Act (PDCA) approach is an integral part of these management systems.

Sustainable water management is of central importance both for the stability of existing processes and for ensuring the long-term operational viability of voestalpine’s production sites. Group-wide, structured systems and clearly defined processes for responsible water management are in place at site level. All voestalpine production sites are included in reviews of water resources. These indicate

that voestalpine sites are located in regions with water stress. Most of these sites have already implemented an environmental management system. The future integration of environmental management systems will be examined for the remaining sites in such regions.

Current water management activities within the framework of voestalpine environmental management systems include the following key elements:

» **Local water management plans**

Since water systems vary locally and are influenced to differing degrees by voestalpine companies, all water management strategies and measures are coordinated with local authorities and communities. In line with the pertinent legal requirements, all water withdrawals and water discharges are subject to official permits and are monitored in terms of quantity and quality. These permits are regularly reviewed in cooperation with external experts and adjusted if necessary. Comparisons with the current state of the art are also carried out on a regular basis (depending on developments and specifications), on the basis of which further adaptations are determined and implemented if necessary.

» **Separate water circuits**

Separate water circuits are used in the production processes to reduce and prevent the discharge of pollutants. As described above, the majority of the water withdrawn is used for cooling purposes, primarily through the use of indirect cooling systems. These function as separate cooling circuits: the primary cooling water flow, which draws on river water, for example, cools a secondary cooling circuit with the use of heat exchangers, which is then fed to the actual process. As a result, no pollutants are introduced into the water flow and the quantities of water removed can be returned to the ecosystems without any loss of quality. In the event that these continuous flow systems require very large amounts of water, the energy requirement, the maintenance work required, and the associated use of chemicals are comparatively low. Depending on local conditions, water availability, and process requirements, multiple cooling systems and circulation systems with cooling towers are also used. In addition to separated closed-loop circulation, actions are also taken to prevent the release of pollutants into the environment—in particular into groundwater—in the event of unplanned events or damage. For example, storage areas and production lines are equipped with catchment and retaining systems that are subject to regular inspections and functional tests.

» **Comprehensive waste water treatment**

In cases when contamination by direct product contact or process control is technically unavoidable, water pollution is minimized through targeted post-treatment. Specifically designed treatment processes for on-site waste water treatment facilitate the effective capture of pollutants. Efforts are made to treat similar waste waters with similar compositions together. At the Linz site, for example, alkaline and acidic waste waters from various production lines are separately collected and processed in specifically designed installations. Samples are taken on a regular basis from all discharge points and the relevant metrics are analyzed by accredited laboratories and monitored by the authorities. In cases where municipal waste water treatment plants have the necessary separation methods at their disposal, waste water is also sent to them directly. The composition and amount of waste water are contractually regulated to ensure that the separation of pollutant is warranted by the external facility.

## POLICY OVERVIEW

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
Water withdrawal, water consumption	Environmental Policy	Own operations	Management boards of the companies	» For implemented environmental management systems: regular compliance check as part of the PDCA cycle and engagement of authorities, experts, and direct representatives of neighboring communities as necessary

### E3-2 – Actions and resources related to water and marine resources

The implemented environmental management systems and the water management plans in place at the operational sites require that in addition to continuous monitoring, activities relating to water and waste water management are defined and implemented on an ongoing basis.

The focus is on three key fields of action, which are explained in the previous chapter E3-1. This includes the separate management of water circuits to reduce and prevent the discharge of pollutants as well as to reduce water withdrawal and the associated waste water discharges, supported by local water management plans. Comprehensive waste water treatment also plays a crucial role, along with the development of safety measures to prevent unplanned emissions of pollutants such as leaks or fluid discharge. As with pollution, water protection activities are also implemented primarily at the local level, with no Group-wide action policies in place.

The large number of individual measures with varying scopes ultimately contributes to comprehensively improving the environmental situation. As corresponding water management activities are already being undertaken successfully within the framework of existing environmental management systems, no additional activities are currently envisaged.

The implementation of the aforementioned ongoing water management activities under the environmental management systems does not require significant operating expenses and/or capital expenditure. None of the planned actions in this area through business year 2030/31 currently exceeds EUR 5 million.

## METRICS AND TARGETS

### E3-3 – Targets related to water and marine resources

The main focus of the Group is on minimizing the impact of the production facilities on the local ecosystems and aquatic systems. On the one hand, this means avoiding or reducing the introduction of pollutants into water to the greatest possible extent, and, on the other, reducing the quantities of water in full, where possible, and keeping the thermal load low.

Pollutant discharges or water withdrawals can have an impact on the surrounding ecosystems and the local water balance. This, in turn, requires that regulations and requirements are adapted to local conditions. As targets often hinge on local conditions, they are set by the individual companies. For this reason, a Group-wide requirement for water quality or water consumption is not considered expedient. Within the framework of the existing environmental management systems, the companies pursue individual water management targets that are geared to local conditions. The effectiveness of local actions with regard to target attainment is reviewed through regular audits performed by external institutions. Group-wide target setting pursuant to ESRS is therefore not currently envisaged.

#### E3-4 – Water consumption

The term water consumption is widely used, but is often assigned varying definitions and interpretations. According to ESRS, water consumption refers to the amount of water drawn into the boundaries of the undertaking (or facility) and not discharged back to the water environment or a third party over the course of the reporting period. For the production of iron and steel and the processing of steel products, evaporation losses, and evaporation are the main influences on the water consumption.

The more extensive a technical process is, the more difficult it becomes to balance water flows. Accordingly, in a complex system such as an iron and steel mill, it is not possible to completely balance quantities using the monitoring systems in place. In light of this, the voestalpine Group has carried out a separate investigation into fresh water consumption. In accordance with ISO 14046, extensive water balances were established at the process level and the net fresh water consumption of the sites was calculated. Internal volume measurements were used to draw up the balances although it should be noted that approximately 95% of the water and waste water flows are directly measured by companies of the voestalpine Group. Where these measurements were not available, estimates and extrapolations were made on the basis of state-of-the-art data. This water footprint study was prepared by an external consulting firm in cooperation with experts from the operational sites and verified by another independent verifying body. The consumption figures reported here are based on the findings of this study and on the evaluations of the Group-wide collection of environmental data.

#### OVERVIEW OF WATER CONSUMPTION

	2024/25	2025/26
Total water consumption (m <sup>3</sup> )	15,123,641	15,724,609
Total water consumption in areas exposed to water risk (m <sup>3</sup> )	341,916	345,697
Total water recycled and reused (m <sup>3</sup> )	84,979,662	61,197,319
Total water consumption in own operations (m <sup>3</sup> /EUR million)	961	1,044
Net revenue used to calculate total water consumption in own operations: Total net revenue (Consolidated Financial Statements) (EUR million)	15,743.7	15,063.1

The decrease in the total water recycled and reused can be attributed to the limitation of closed-loop water circulation and withdrawal volumes in crude steel production.

Water consumption from areas exposed to water risk refers to regions affected by high water stress, as defined by the World Resources Institute's Aqueduct Water Risk Atlas.

The amount of water drawn for cooling purposes and production processes was 754.6 million m<sup>3</sup> in the reporting period (2024/25: 757.5 million m<sup>3</sup>). This is the first time this information has been provided on a voluntary basis, and it offers additional useful insights into water management. The data for this metric is collected and calculated for both the previous and current reporting year based on feedback from Group companies.

## OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the assumptions and methodology	Information on sources of a high level of measurement uncertainty and information on measurement
E3-4 – Water consumption	28a	Water consumption	Water consumption figures are based on the water footprint study and have been converted to the BY for reference factors	Measurement uncertainty of monitoring systems and estimate for quarters
E3-4 – Water consumption	28b	Water consumption in areas of high water stress	Water consumption figures are based on the water footprint study and have been converted to the BY for reference factors	
E3-4 – Water consumption	28c	Total water recycled and reused	The parameters are based on data collected internally and have been converted to the BY for reference factors	
E3-4 – Water consumption	29	Water intensity	Calculated on the basis of parameters	
E3-4 – Water consumption	AR32	Water withdrawal	The parameters are based on data collected internally and have been converted to the BY for reference factors	

## ESRS E4 BIODIVERSITY AND ECOSYSTEMS

The conservation of biodiversity and the protection of ecologically vulnerable habitats represent two of voestalpine’s environmental fields of action. The company closely addresses the impacts, risks, and opportunities of its business activities and value chain on biodiversity and ecosystems.

Detailed information on the identified impacts, risks, and opportunities (IROs) related to biodiversity and ecosystems is presented in the IRO table below.

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Biodiversity and ecosystems	● Biodiversity in the upstream value chain	Impacts on ecosystems and biodiversity occur in the upstream value chain, in particular through the extraction of key raw materials for voestalpine production process, such as iron ore and coal (e.g., impacts on the scale and condition of ecosystems due to the extraction of raw materials)	>>>	●●●●	Environmental Information  Suppliers  Local, national, and international authorities

**Key**

● Actual positive impact   ● Actual negative impact   ○ Potential positive impact   ○ Potential negative impact   + Opportunity   ! Risk

>>> Upstream   >>> Own operations   >>> Downstream   ●○○○ < 1 year   ●●○○ 1 – 5 years   ○●○○ 5 – 10 years   ○○○● 10+ years

## STRATEGY

### E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model

As part of the materiality assessment, voestalpine analyzed the extent to which biodiversity and changes in ecosystems have impacts on, and present risks and opportunities to, the business model. voestalpine recognizes that its greenhouse gas emissions contribute to climate change, which in turn affects biodiversity. However, as this relationship is global and does not have a direct impact on specific ecosystems or local sites, it cannot be measured directly. While biodiversity loss is a local phenomenon, emissions have a global impact—therefore, the direct impact of climate change on biodiversity loss due to the Group’s own operations is not considered a material topic for voestalpine. Material impacts were identified in the upstream value chain, especially in relation to the extraction of raw materials. On the other hand, no impacts on biodiversity or ecosystems have been identified for the Group’s own sites, which are mainly located in areas used for industrial purposes. Likewise, no material physical or transition risks were identified that were subsequently analyzed as part of the overall climate risk analysis. The analysis confirmed that the voestalpine business model currently has no direct or material dependence on biodiversity or specific ecosystem services. In light of this, no separate resilience analysis has been carried out to date in relation to biodiversity and ecosystems. More information on the findings from the analysis can be found in chapter ESRS 2 IRO-1 E4.

## IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

### E4-2 – Policies related to biodiversity and ecosystems

voestalpine accounts for relevant biodiversity and ecosystem aspects in order to protect the local environment and ensure compliance with environmental regulations in the environmental management systems in place at site level.

In addition, voestalpine specifically added the topics of biodiversity and the protection of ecosystems to the Code of Conduct and Code of Conduct for Business Partners in the reporting period in order to raise awareness of biodiversity. In the future, this should make it possible to build sustainable supply chains and also strategically select partners while taking the aspect of biodiversity into account. For further details on the Code of Conduct for Business Partners, see chapter G1-1 under “Code of Conduct and compliance guidelines based on it.” A Group-wide approach is currently being developed on the basis of the above policy to systematically take biodiversity aspects into account in the upstream value chain and to evaluate them accordingly. The actions involved in this approach concern implementation in supplier management and are described in the following chapter E4-3. These actions are expected to lead to a better understanding of the impacts on ecosystems in the coming years and to provide a corresponding data set. The development of potential additional policies will then be addressed on the basis of this approach.

### POLICY OVERVIEW

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
Biodiversity in the upstream value chain	Code of Conduct for Business Partners	Business partners	Responsible: Management Board/executive management  Monitoring and compliance regulations: Compliance organization	<ul style="list-style-type: none"> <li>» The result of numerous conversations and discussions at the level of the Management Board as well as among executive management and department heads of the voestalpine Group</li> <li>» The Code of Conduct as well as the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, and the core labor standards of the International Labor Organization (ILO)</li> <li>» Available in multiple languages on the intranet and website: <a href="https://www.voestalpine.com/compliance/en">https://www.voestalpine.com/compliance/en</a></li> </ul>

### E4-3 – Actions and resources related to biodiversity and ecosystems

At voestalpine, material sustainability matters are managed through targeted action and action plans with the aim of preventing, reducing, or remedying actual and potential impacts. Following the identification of relevant impacts in the upstream value chain, initial actions have been initiated.

A thorough understanding of suppliers is crucial when it comes to minimizing voestalpine's negative upstream impacts on biodiversity and ecosystems. voestalpine has developed a dedicated questionnaire to systematically record the environmental footprint along the supply chain. The questionnaire will be used for the structured collection of relevant information on biodiversity conservation and environmental responsibility in the extraction of raw materials. Selected suppliers of raw materials are the primary focus of the questionnaire—especially suppliers of raw materials such as ores and coal that have a material impact on natural habitats. voestalpine aims to gain insights into the environmental practices of its suppliers and create a data set in order to better assess risks and develop further measures or policies for the future.

voestalpine aims to systematically integrate the responsible use of natural habitats into the supplier management system in the future. Integration of the dedicated questionnaire into the Supplier Assessment Questionnaire (SAQ) is currently being worked on. As a result, conserving biodiversity will become an integral part of cooperation across the value chain.

In addition to raising awareness, these ongoing measures are expected to help suppliers to gain an overview of biodiversity practices and risks in the coming years. The aim is to then use this as a basis for examining the introduction of further measures in the future. In addition to meeting regulatory requirements, such as the CSDDD, this should also enhance transparency and reduce risks in supply chain with regard to biodiversity.

Compensation measures for impacts on biodiversity and ecosystems are currently not pursued by voestalpine.

voestalpine does not operate any sites in areas with indigenous populations. Indigenous knowledge is therefore not taken into account in the implementation of its activities.

## OVERVIEW OF ACTIONS

IROs addressed	Action	Time horizon	Scope of the action	Significant expenditure (if relevant)/other comments
Biodiversity in the upstream value chain	Integration of a supplier questionnaire on biodiversity and ecosystems into the SAQ	Current actions	Selected raw material suppliers	If necessary, division of Group targets based on actions after initial evaluation

## METRICS AND TARGETS

### E4-4 – Targets related to biodiversity and ecosystems

As things currently stand, voestalpine does not pursue any targets on the topic of biodiversity and ecosystems. In the coming years, a solid data basis is to be created upon which concrete targets can be developed and anchored in the medium to long term. The general measures mentioned under E4-3 are currently still in the introduction phase and therefore their effectiveness can only be evaluated at a later stage.

## ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY

Steel offers the ideal prerequisites for the circular economy due to its full recyclability, its durability, and its reparability. voestalpine is committed to resource efficiency by reintroducing scrap and other metallic residues back into the production process. By 2030, the use of secondary raw materials is to be further intensified by increasing the use of scrap in crude steel production by 50%.

By-products such as slag, dust, and sludge are recycled within the company or transferred to other industries where technically feasible and legally permissible. This reduces the company's reliance on primary raw materials.

In addition, voestalpine helps its customers increase their use of secondary raw materials through closed material cycles and recycling policies. The aim is to keep raw materials in the economic cycle for as long as possible and to minimize waste.

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Resource inflows, including resource use	● Sourcing and use of primary resources	The extraction and refining of primary raw materials, in particular iron ore, coking coal and metallic alloying elements, results in significant material environmental impacts along the whole value chain. Collectively, raw material extraction, transport, processing and use have a decisive influence on the environmental profile of the metal and steel industry	>>>	●●●●	Environmental Information  Suppliers  Internal departments (e.g., Purchasing)
Resource outflows related to products and services; and waste	● Business models for recycling	voestalpine helps its customers increase their recycling rate by concluding and implementing circular economy agreements (e.g., recycling agreements) with a focus on recycling scrap iron and steel scrap. The increased use of secondary materials can significantly reduce the CO <sub>2</sub> intensity per ton of steel. The establishment of closed-loop material cycles and growing customer demands for resource efficiency also contribute to this materiality	>>>	○●●●	Customers  Suppliers  Industrial associations

### Key

● Actual positive impact   ● Actual negative impact   ○ Potential positive impact   ○ Potential negative impact   + Opportunity   ! Risk  
 >>> Upstream   >>> Own operations   >>> Downstream   ●○○○ < 1 year   ●●○○ 1 – 5 years   ●○○○ 5 – 10 years   ○○○● 10+ years

## IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

### E5-1 – Policies related to resource use and circular economy

#### SUSTAINABILITY STRATEGY – CIRCULAR ECONOMY

In business year 2025/26, voestalpine refined and further developed the circular economy strategic sphere of action as part of its sustainability strategy. This took place on the basis of the existing circular economy concept, which takes into account the external requirements of customers, markets, regulatory frameworks, and society as well as the challenges posed by a volatile commodity and energy market. It also sets forth internal priorities to ensure the economic and sustainable use of resources.

Within the framework of the circular economy concept, several strategic priorities have been identified. These were addressed as part of the review of the sustainability strategy under the circular economy and resource conservation sphere of action, refined, and further specified:

- » Improving the life cycle assessment through sustainable process design across the entire value chain
- » Ensuring the supply of raw materials in the long term and reducing dependence on individual countries
- » Increasing resource efficiency by optimizing material use and minimizing waste
- » Supporting the achievement of voestalpine's sustainability targets and increasing security of supply for customers
- » Exploiting economic potential and new business opportunities in relation to the circular economy

Strategic initiatives and actions have been defined, for example, relating to circularity, secondary raw materials, zero waste, and material and energy use, which can facilitate the development of targets.

As an essential component of the Group-wide circular economy strategic sphere of action, voestalpine has already implemented activities for the recycling of material flows and has developed a waste management concept. These initiatives will form the basis for the future strategic orientation and advancement of the Group's circular economy. As part of the sustainability strategy, the circular economy strategic sphere of action is reviewed regularly as part of the strategy process.

At voestalpine, the circular economy is based on a model with 10 circular economy principles (10R). The circular economy is considered at different levels, covering both processes and products at different stages of the value chain and processing depths, as well as their business models.

The focus is on recovering value components and energy content for use in voestalpine processes and products and expanding cycles to prevent and minimize waste.

The main focus and core aspects of the circular economy at voestalpine are circularity, secondary raw materials, zero waste and complementary circular business models—each at the process and product level.

One important aspect in terms of secondary raw materials is voestalpine's approach to recycling, which aims to return internal and external scrap (pre-consumer and post-consumer) to production. The recycling initiatives cover the whole value chain—from the sourcing of raw materials to the return of recycled materials to production. voestalpine works in close partnership with its global suppliers and customers.

A particular challenge posed by recycling post-consumer scrap lies in maintaining the quality of the metal in the recycling process. This requires careful collection, sorting, and processing to ensure the scrap can be reused as a high-quality raw material.

The further expansion of scrap circuit loops and the increasing use of internal and external scrap in steel production is expected to improve the use of secondary resources. Use of scrap in crude steel production is also to be increased by 50% by 2030. In addition, extending the product service life through closed product and service cycles and reprocessing of tools and installations helps to reduce primary raw material requirements.

voestalpine works closely with its customers to close material loops. The aim is to increase their recycling rates and to increase the share of recycling and the use of secondary raw materials in general.

In terms of by-products from metallurgical processes, such as blast furnace slag (metallurgical slag), the policy envisages processing and use as secondary raw materials in the company's own installations or other industrial sectors.

Another important aspect of the circular economy strategic field of action is voestalpine's zero-waste approach, which aims to minimize or prevent waste as much as possible. In concrete terms, the policy calls for:

- » A reduction in waste and landfill volumes, in particular more internal recycling of recyclables
- » A reduction in the use of primary materials by introducing more secondary raw materials and recycled materials into the production cycle
- » Ensuring the proper treatment of waste through binding agreements with external partners in line with the state-of-the-art technology
- » Ongoing electronic monitoring and annual accounting for waste streams to ensure transparency and legal compliance

## **ENVIRONMENTAL POLICY**

The Group's Environmental Policy is an overarching framework that defines principles and guidelines for various aspects, including the circular economy. This includes circular economies within the framework of voestalpine's sustainability strategy and environmental management systems. The latter help to clarify and put the principles of the Environmental Policy into practice at an operational level.

## **BUSINESS MODELS FOR RECYCLING**

The voestalpine Group strives to establish and further expand its business models to facilitate recycling. The High Performance Metals Division (HPM), for example, has developed the divisional InSPire concept that covers all aspects of sustainability. As part of this concept, customers are able to participate in sustainable initiatives, while suppliers and partners are motivated to help shape transformation processes.

In terms of the circular economy, HPM focuses on material and scrap cycles, alternative sources of raw materials, recycling by-products, and zero waste.

## **PROCUREMENT POLICY – SUSTAINABLE PROCUREMENT**

Raw materials are sustainably procured on the basis of the Group's Procurement Policy, which ensures that materials, including raw materials, are obtained in an environmentally friendly, ethical, and socially responsible manner.

In concrete terms, this involves:

- » Supplier assessments and on-site audits to ensure compliance with sustainability criteria with regard to the environment (e.g., waste and recycling, water consumption and wastewater, emissions, biodiversity), human rights (e.g., discrimination, child and forced labor, health and protection), working conditions (e.g., working hours, occupational health and safety, fair pay), and governance (compliance and anti-corruption)
- » A revised Code of Conduct for Business Partners that contains specific requirements for sustainable procurement For more detailed information, please consult G1-1
- » Ongoing raising of awareness among global business partners with regard to sustainability targets and requirements for transparency in the supply chain

More information on the Procurement Policy can be found in chapter S2-1.

### INNOVATION, RESEARCH, AND DEVELOPMENT

In order to optimize the use of resources, voestalpine continuously pursues product and process innovations to set new benchmarks in resource efficiency. Policies and actions related to research, development, and innovation are described in the chapters I,R&D-1 and I,R&D-2.

### POLICY OVERVIEW

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
All IROs for E5	Sustainability strategy – Circular Economy	Own operations  Upstream and downstream value chain to a partial extent	Management boards of the divisions	» Consider external requirements of customers, markets, regulators, and society
All IROs for E5	Environmental Policy	Own operations	Management boards of the companies	» For implemented environmental management systems: regular compliance check as part of the PDCA cycle and engagement of authorities, experts, and direct representatives of neighboring communities as necessary
All IROs for E5	Business models for recycling	Own operations  Upstream and downstream value chain to a partial extent	Management boards of the divisions	» e.g., InSPire—High Performance Metals Division
Sourcing and use of primary resources	Procurement Policy – Sustainable Procurement	Own operations  Upstream value chain	Procurement board	» Consider stakeholder analysis in policy  » Communication to <a href="mailto:procurement@voestalpine.com">procurement@voestalpine.com</a>

## E5-2 – Actions and resources related to resource use and circular economy

voestalpine pursues numerous measures to promote its internal circular economy and the external recovery of residues and waste—both from its own production and processing facilities and plants as well as from the downstream value chain. For one, process management in the integrated steel mills is subject to continual improvement. For another, internally and externally generated material flows as well as residual products and waste such as scrap and plastic are re(used) in the production plants.

### PRIORITIES FOR ACTION

In its circular economy and resource conservation strategic field of action—part of its sustainability strategy—voestalpine has modeled its circular economy approach on the ten principles of circular economy (10R). These are implemented throughout the Group with three main areas of focus—narrowing the loop, slowing the loop, and closing the loop.

Loops are narrowed by minimizing the use of resources, increasing energy and material efficiency, and avoiding waste.

By contrast, loops are closed by treating and recycling raw materials and other materials in order to reduce the use of primary raw materials.

The following are examples of activities already being implemented by voestalpine:

- » Increasing the use of scrap metal and ensuring economic supply by expanding closed loops (gradual increase in the volume of scrap from external customers in preparation for the first phase of the transformation) with European automotive OEMs, suppliers, and railway operators for high-quality scrap metal and with tool manufacturers for higher-alloy steels
- » Optimizing the use of generated waste, as well as the treatment and recycling of associated streams such as scale, slag, sludge, and other metallurgical by-products
- » Securing the supply of raw materials by developing alternative secondary raw material sources, including the recovery of valuable materials from production processes (e.g., sludge and dust fractions)
- » Increasing the share of secondary materials in products
- » External marketing of secondary raw materials, in particular slag, in order to make the best possible use of industrial secondary raw materials
- » Reducing waste treatment and disposal, e.g., landfill volumes, through recycling and reuse in production, and processing processes
- » Recovering energy using waste heat from production processes, both for internal demand and for supplying to district heating
- » Efficiently using process gases as energy carriers in the individual process stages, thereby reducing the need for primary energy

Metal recycling activities contribute to reducing the use of primary resources.

The activities and measures for the scrap circular economy support target achievement pursuant to chapter E5-3 and are mainly undertaken in the Steel Division and Metal Engineering Division as part of the transformation of production processes for decarbonization efforts, and in the Metal Forming Division. Production in the High Performance Metals Division is already largely scrap-based. Projects are in place across all divisions to promote circular economy, preventing waste, and increasing energy efficiency. The actions therefore extend across the entire voestalpine Group.

Applying circular economy principles to material and energy flows at voestalpine requires broadening the perspective beyond the Group's own products and processes and integrating other value chains, for example for secondary raw materials, by-products, waste, and energy. voestalpine engages with its stakeholders on the circular economy at various levels. This includes, for example, direct dialog along the value chain with customers, suppliers, investors, and authorities (local, national, international) to support the implementation of activities and actions for voestalpine's circular economy.

In the reporting year, relevant capital expenditure of EUR 10.2 million was spent on actions and activities relating to waste and circular economy. (Expenditure exceeding EUR 5 million is considered relevant.)

## OVERVIEW OF ACTIONS

IROs addressed	Action	Time horizon	Scope of the action	Significant expenditure (if relevant)/other comments
All IROs for E5	Metal recycling—using scrap as a resource	By 2030, depending on project	Entire upstream value chain	The means of achieving this initiative are accounted for in the greentec steel program and are included in E1 as part of the Climate Transition Plan
Business models for recycling	Package of stakeholder engagement measures	Up to 2030	Own operations  Upstream and downstream value chain included in analysis	-

## METRICS AND TARGETS

### E5-3 – Targets related to resource use and circular economy

The voestalpine Group has set itself the voluntary target of increasing the use of scrap in crude steel production by 50% in its own operations by 2030. The increased use of secondary raw materials is designed to reduce the reliance on primary raw materials. This target falls under the third of the five stages of waste hierarchy under the EU Waste Framework Directive (2008/98/EC), namely recycling, as scrap is recycled as a raw material and reintroduced into the production loop. As the increased use of secondary raw materials optimizes the efficiency of the material cycle and reduces waste generation, this target is directly linked to improving the circular material use rate. Focusing on recycling scrap is crucial when it comes to reducing the use of resources and promoting a circular economy.

The inherent properties of steel are preserved through the recycling process. Steel products are durable, highly repairable and fully recyclable. The target therefore supports circular product design.

Another contribution to the achievement of this target is the planned technological transformation over the course of decarbonization, which requires a fundamental adaptation of the materials and circular economy, in particular through the increased use of secondary raw materials. Secondary raw materials are sourced and used at voestalpine in accordance with the principles of sustainability.

The targets were defined using specific methodologies and assumptions based on internal analyses and technical evidence, taking account of voestalpine's greentec steel program. Along with other factors, these include the interaction between the circular economy and GHG emissions, and the availability and quality of scrap as a secondary raw material. Assumptions have been made with regard to technological advancements and the market availability of scrap, which are accounted for in the set targets. Internal (e.g., strategy, technology, purchasing) and external stakeholders (e.g., customers) were involved in the target setting process.

The plan to increase the use of scrap is reviewed on an annual basis to ensure that progress is being made in line with the envisaged targets. Progress monitoring includes the identification and reporting of the scrap used in crude steel production on a regular basis. Circular systems were rolled out at the sites with integrated steel mills in Linz and Donawitz. These systems make it possible to recover, treat, and reuse valuable materials so that the material flows can be returned to the processes.

The planned technological transformation over the course of decarbonization requires a fundamental adaptation of the materials and circular economy management and is expected to make a significant contribution to achieving the voluntary target. Potential requirements for the circular economy from voestalpine's value chains are taken into account.

The divisions have also set voluntary divisional targets for resource use and the circular economy, for example within the framework of InSPire.

#### TARGET: USE OF SCRAP IN CRUDE STEEL PRODUCTION

<b>KPI</b>	Increase in scrap use	
<b>UNIT</b>	in percent	
<b>BASE VALUE RESCALED</b>	<b>STATUS</b>	<b>TARGET VALUE</b>
2.07 million t Calendar year 2023	+3.6% Business year 2025/26	+50% Business year 2029/30
<b>Responsibility and monitoring</b>	Management boards of the divisions	
<b>Scope</b>	Own operations, upstream and downstream value chain to a partial extent	
<b>Stakeholders</b>	Customers, state, authorities, shareholders, society	
<b>IROs addressed</b>	All IROs for E5	
<b>Reference to policy</b>	All policies from E5	

Due to a change in the Group structure (sale of Buderus Edelstahl) and the associated elimination of scrap-based production in the business year 2024/25, the base value for scrap use was adjusted from 2.25 million tons to 2.07 million tons.

The reduction in the use of primary resources associated with the target can reduce the impacts on the loss of biodiversity in the upstream value chain (extraction of raw materials).

#### E5-4 – Resource inflows

As a producer of iron and steel products, voestalpine's main resource inflows are iron carriers such as ore, pellets, scrap, as well as the reducing agents coal, and coke. The following sections describe the main materials used in more detail.

#### RAW MATERIAL:

##### Iron ore

Iron ore is the key raw material for the production of crude steel through the blast furnace route and also plays a role in combined production involving direct reduction processes and an electric arc furnace (EAF) in the form of DRI (direct reduced iron, sponge iron), and HBI.

##### Coking coal

Coking coal forms the basis for the production of metallurgical coke and is therefore an important reducing agent. A reducing agent is a substance that removes oxygen from an ore and thereby converts the oxide into a metal. As part of the blast furnace route, coke, among other elements, reduces the iron oxide in the iron ore to produce pig iron. In addition, metallurgical coke provides the energy required for the blast furnace process.

##### Iron and steel scrap

Iron scrap is vital for both the oxygen converter (BOF) and electric arc furnaces (EAF). While the use of scrap in the BOF is limited by the metallurgical process conditions, an EAF can be operated with higher scrap use (up to 100% scrap) depending on the required product quality. Some of the scrap used is internally generated circular scrap from our own production, which is reintroduced to the process. Scrap is also produced during steel processing, for example during stamping processes in the automotive or white goods industry, and is then reintroduced into the materials loop as pre-consumer scrap.

##### Alloys

Different alloys make it possible to achieve specific steel properties. Important alloying elements include chromium, nickel, manganese, molybdenum, and vanadium, which give steel strength, hardness, corrosion resistance, and heat resistance, among other properties.

##### Water

Water is an important operating and auxiliary resource in the entire production and manufacturing process at voestalpine. It is used to cool the units, as process water, and to generate steam used for energy. For more information on water, see chapter E3.

#### voestalpine's RESOURCE INFLOWS

	2024/25	2025/26
Total weight of products and technical and biological materials used (t)	10,370,906	10,919,625
Percentage of biological materials (%)	0	0
Total weight of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture the company's products and services (t)	1,162,539	1,079,859
Percentage of recycled materials used in manufacturing (%)	11	10

Resource inflows are quantitatively analyzed in relation to steel products and on the basis of a database, which is also used to analyze other environmental metrics and to calculate GHG footprint. The majority of the metrics reported for this database are obtained from direct measurements taken by the companies or verifiable data on quantities provided by the suppliers. In certain cases, quantities are extrapolated from previous years' figures.

The predefined query structure for data collection helps to prevent double counting.

## E5-5 – Resource outflows

### PRODUCTS AND MATERIALS

As a steel and technology group, voestalpine offers a wide range of products and system solutions for various industries. These products are produced in four divisions with different focuses:

Division	Business unit	Products	Circular properties
<b>Steel</b>	Strip	High-quality steel strip	Highly durable; up to 100% recyclable; reused through scrap cycles
	Heavy Plate	Heavy plates	Durable; repairable; recyclable
	Foundry	Cast products	High recyclability through recycling in steel production
<b>High Performance Metals</b>	Production/ Value Added Services	Tool steels, high-speed steels, copper and aluminum alloys, nickel-based alloys, valve steels, machine steels, special steels, titanium products, services	Reprocessing to extend service life; complete recycling possible
<b>Metal Engineering</b>	Railway Systems	Rails, switches, signaling	Durable; repairable; reprocessable; long life; interchangeable thanks to modular design; recyclable
	Welding	Complete welding solutions	Recyclable base materials
	Wire Technology	Quality wires	Reusable; recyclable; durable
	Tubulars	Seamless tubes	Durable; repairable; up to 100% recyclable
<b>Metal Forming</b>	Tubes & Sections	Profile and tube products	Reusable; recyclable; long life
	Automotive Components	Ready-to-install system components made of pressed, stamped, and roll-formed parts	Designed for disassembly and recycling; modular design
	Precision Strip	Precision strip steel	High durability; recyclable
	Warehouse & Rack Solutions	Warehousing technology	Modular expandability and reusability

As voestalpine predominantly manufactures intermediate products that are further processed by its customers, a direct assessment of the final quality and associated statements on durability, reusability, and recyclability are only possible to a limited extent. For example, the same material, such as a heavy plate, can be installed in a ship's hull, a bridge, or a wind turbine, resulting in vastly different service lives. In general, however, steel products are long-lasting, highly repairable, and fully recyclable and can be reintroduced into the steel production process as scrap.

Depending on their application, steel products can have a service life of a few years to several decades. Regardless of the service life, steel products can theoretically be fully recycled time and again. Due to material losses in the closed circuit, it is currently assumed that substitution potential stands at 95%.

Compared to the products themselves, their packaging is of negligible relevance to voestalpine: packaging is assumed to make up less than 1% of the overall product weight.

## WASTE

Steel production and the further processing of steel products generate various waste and recyclable materials, most of which can be reused in voestalpine's operations or recycled in other industries. If recycling is not possible for quality reasons or due to legal regulations, waste is treated and disposed of in line with the pertinent legal requirements.

Typical waste streams in the iron and steel sector:

- » **Slag** is primarily a mineral phase composition produced in iron and steel production that can be used or disposed of in other industrial sectors, depending on the legal requirements for the material stream. For particular use cases, slag can also be classified as a by-product
- » **Dusts** may contain metallic and non-metallic particles and are produced during exhaust gas purification, e.g., in dedusting plants.
- » **Sludge** produced by the wet scrubbing of exhaust gases and in the treatment of process and waste water, for example, and consisting of various mineral phases and/or metallic components.
- » **Scrap and ferrous materials**, such as metal residues, scale (oxidized metal particles) and other ferrous waste, which are largely reused.

At Group level, a survey of all metrics relevant to the environment takes place on an annual basis using an online reporting system. Waste-specific data is collected by local experts and definitions of waste types are entered in accordance with national requirements. The majority of the reported waste generation is based on direct volume measurements, which are also required by local regulations and verified by external bodies (e.g., the local authorities). Remaining residual quantities are extrapolated using the previous year's figures or indicative values.

## RESOURCE OUTFLOWS

In tons	Hazardous waste		Non-hazardous waste	
	2024/25	2025/26	2024/25	2025/26
<b>Waste diverted from disposal (re-use)</b>				
Preparing for re-use	5,019	5,173	15,237	20,996
Recycling	7,027	7,242	106,661	146,974
Other recovery operations	88,341	91,041	639,967	881,841
Overall	100,387	103,456	761,865	1,049,811
<b>Waste disposed of</b>				
Incinerated	2,804	2,101	4,552	2,355
Landfill	12,153	9,106	100,146	51,816
Other form of disposal	78,526	58,839	350,511	181,356
Overall	93,483	70,046	455,209	235,527
Total amount of waste generated	193,870	173,502	1,217,074	1,285,338
Share of non-recycled waste (%)	48	40	37	18
Of which radioactive waste	0	0	-	-

Higher potential for the recycling of slag from production processes has reduced the share of non-recycled waste compared with the previous year.

## OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the assumptions and methodology	Information on sources of a high level of measurement uncertainty and information on measurement
E5-4 – Resource inflows	31c	Weight of reused or recycled secondary components, intermediary products, and materials (including packaging)	The parameters are based on data collected internally and have been converted to the business year for reference factors.	Measurement uncertainty of internal data collection systems and estimate for quarters
E5-5 – Resource outflows	37a	Total amount of waste generated		
E5-4 – Resource inflows	31b-c	Biogenic and recycling content of resource inflows		
E5-4 – Resource inflows	31a	Material input		
E5-5 – Resource outflows	36a	Product longevity		
E5-5 – Resource outflows	36c	Recyclable content		

## I,R&D INNOVATION, RESEARCH AND DEVELOPMENT

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Innovation, research & development	● Product innovations	Through ongoing research and development, the product portfolio is being expanded to include low-emission steel grades from certified sites, as well as innovative materials and components that take environmental considerations into account	>>>	●●●●	Educational institutions and research  Customers
	+ Increased recycling efficiency through technological innovation	Introducing innovative technologies into the recycling process can boost efficiency and further increase the recycling rate, especially for old scrap, resulting in cost savings through increased resource efficiency and reduced reliance on purchased materials. This is also essential as it helps with entering new scrap markets and the associated stabilization of the material supply	>>>	○●●●	Educational institutions and research  Customers
	+ Breakthrough technologies	voestalpine invests in research, development, and innovation to establish the technological basis for steel production with net-zero CO <sub>2</sub> emissions. These breakthrough technologies include, in particular, processes for hydrogen-based steel production, such as Hy4Smelt, or for carbon capture, utilization and storage (CCUS)	>>>	●●●●	Educational institutions and research  Customers
	! Ensuring product quality with increased use of scrap	The increased use of scrap in the course of the transition of primarily coal-based blast furnaces to electric arc furnaces carries the risk of decreasing product quality. This risk is material due to potential quality losses arising from changes in the use of raw materials (scrap, fine ore) and due to high quality requirements in the customer industries	>>>	○●●●	Customers

### Key

● Actual positive impact    ● Actual negative impact    ○ Potential positive impact    ○ Potential negative impact    + Opportunity    ! Risk  
 >>> Upstream    >>> Own operations    >>> Downstream    ●○○○ < 1 year    ○●○○ 1 – 5 years    ○○○○ 5 – 10 years    ○○○● 10+ years

## IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

### I,R&D-1 – Policies related to innovation, research & development

As key elements of the corporate strategy, Research and Development (R&D) and Innovation make a significant contribution to voestalpine's position as a leader in innovation, technology, and quality. In the business year 2025/26, the R&D and Innovation Strategy 2030+ was developed on the basis of the Group Strategy 2030+, with implementation planned to begin in the 2026/27 business year. The strategy aims to ensure the long-term economic success of the company through innovative processes and sustainable products.

voestalpine's decentralized R&D and Innovation organization is underpinned by strategic innovation guidelines, a defined innovation process, and the alignment of research projects with the phased implementation of CO<sub>2</sub> emission reduction technologies to achieve net-zero emissions by 2050. As research cannot be considered in isolation, no measurable and specific outcome-oriented targets have been set for R&D and innovation at this stage (see chapter I,R&D-3).

Policies related to R&D and innovation are not based on external statements or principles, and there are no available frameworks or standards on which this report is based with the exception of MDR-P from the ESRS standard. The geographical area and scope of the policies encompasses all of the Group companies around the world active in R&D. The strategies are communicated internally through the R&D network, namely at internal events and on the Group-wide intranet. The strategies are communicated to external stakeholders, such as customers or applicants, for example at presentations or on company websites.

### ORGANIZATION OF INNOVATION, RESEARCH, AND DEVELOPMENT AT THE voestalpine GROUP

R&D and innovation at the voestalpine Group is organized in a decentralized manner in order to ensure close links are maintained with the respective companies, their production, and quality control as well as with the market and customers. The global network with around 70 locations involved in R&D is centrally controlled from Linz by the Research Board and Research Coordination.

The Research Board, which is composed of the members of the Management Board of voestalpine, the divisional technical directors and the Head of Group Development, meets twice a year. It coordinates the Group and divisional innovation roadmaps, thereby setting the research priorities. The research activities within the divisions are led by an R&D coordinator, while digitalization agendas that involve R&D are managed by the divisional digitalization coordinators. The respective steering committees meet quarterly. The Research Committee is primarily composed of the research managers at companies and business units that engage in R&D, and provides a format for the sharing of information between the individual divisions as well as strengthening synergies across divisional boundaries. The Research Committee and Research and Digitalization Coordination are chaired by the Group Head of Research.

Strategic R&D management, overseen by the Group Head of Research, plays an overarching role within the organization. One of its core tasks is to represent the Group in matters concerning R&D, research policy, and public relations. Other activities include the coordination of committees and steering groups, the preparation of the R&D strategy, and active patent, literature, and funding management. The Group's internal research organization is complemented by cooperation with external scientific partners.

## R&D ORGANIZATION



The decentralized organization of research activities within the voestalpine Group makes a significant contribution to strengthening the efficiency and effectiveness of the corresponding product and process innovations. Each research site has specific core competencies, which facilitates the development of a diverse range of products. In addition, the pooling of expert knowledge at select locations promotes the implementation of process innovations geared towards a sustainable society.

### STRATEGIC INNOVATION GUIDELINES

voestalpine's R&D and Innovation strategy is directly derived from the Group strategy. The strategic innovation principles underline the importance of R&D within the Group and its contribution to the sustainable and successful development of voestalpine. They were completely revised as part of the strategy process in the business year 2025/26:

#### 1. We align our R&D-activities strategically from:

R&D activities are clearly aligned with the strategic direction of the voestalpine Group, with a focus on value creation and competitiveness.

#### 2. We rely on focused R&D and transparent control:

R&D projects of high strategic importance are prioritized and allocated the appropriate resources. Select priority topics are the focus in this regard.

#### 3. We create synergies through internal and external cooperation:

We rely on interdisciplinary teams, knowledge sharing and knowledge transfers, and strengthen competencies in Group-wide clusters of experts. Together with our global network of scientific partners, we work on common issues over the long term.

#### 4. We develop innovations for and in partnership with our customers:

We work in close collaboration with our customers and their R&D departments to develop products, systems, and business models from the initial concept to market launch.

**5. Our R&D employees are the most important factor in our success:**

The human factor is paramount, and we prioritize training, qualifications and promoting young talent to secure long-term expertise.

**6. We are committed to continuous improvement:**

Our developments are aimed at improving quality and optimizing costs.

**7. We are breaking new ground and embracing innovation:**

We are curious and open to new trends and technologies, driven by creative freedom and a willingness to take risks.

**8. R&D is the driving force behind the green transformation:**

We actively accept the challenges and opportunities posed by the green transformation, and develop processes to integrate new production routes. As a core aspect of our innovations, we take sustainability into account both in the manufacturing process as well as in the downstream processing and use phases.

Our strategic innovation guidelines are specifically geared towards the IROs for product innovations. When formulating the guidelines, the interests of various stakeholders, including customers, employees, and applicants, as well as the Management and Supervisory Board, were taken into account through measures such as dialogues, cooperation, and events.

**PRIORITIZED INNOVATION ROADMAPS**

All R&D activities are aligned with the voestalpine Group strategy (see strategic innovation guidelines), which is geared toward current and relevant megatrends. These activities are assigned to the research priorities of the individual divisions and summarized in the prioritized innovation roadmaps. Each key topic is broken down into more detail in the corresponding roadmaps of the divisions, business units, and companies, and eventually at individual project level. The innovation roadmaps depict development programs and projects with a time horizon of 10 to 15 years.

Preparation of the prioritized innovation roadmaps falls under the responsibility of the R&D coordinator of each division. Once complete, the roadmaps are coordinated with the members of the Management Board in charge of the divisions on the corresponding decision-making boards. This is followed by annual approval by the Management Board within the framework of the Research Board. The respective prioritized innovation roadmaps—available for all companies that engage in R&D in the individual divisions—aim to define medium and long-term innovation priorities in terms of product and process development, and to allocate the necessary resources. This allows voestalpine to help shape new market trends and establish successful innovations (see IROs for product innovations). The roadmaps take into account the needs of customers and markets along with any new technological advancements or legal requirements and standards.

## **R&D STRATEGY FOR MODULAR IMPLEMENTATION OF NEW TECHNOLOGIES TO ACHIEVE DECARBONIZATION TARGETS**

In order to achieve the decarbonization targets, the R&D and Innovation strategy pursues a three-pronged approach to prepare for and accompany the Group's decarbonization strategy:

- » In the first stage, the existing blast furnace processes are optimized to minimize CO<sub>2</sub> emissions and to ensure the efficient use of by-products.
- » Progress is made on the electrification of processes in the first expansion step. Intensive research activities are required to facilitate the commissioning and successful operation of the electric arc furnaces at the sites in Linz and Donawitz. These activities include test melts, the development of alloy concepts as well as simulations and modeling. Research is focused on upholding our ability to continue producing the highest quality steel grades even after the process route has been changed in order to counteract the risk of decreasing product quality due to a higher use of scrap material in the EAF route. Due to increasing demand for scrap metal, research is needed to make the most efficient use of available resources and to tap into new sources, such as post-consumer scrap, for example through closed loops with customers.
- » In order to achieve the net-zero emissions target by 2050, new technologies must be developed and brought to market, in addition to electric arc furnaces. These breakthrough technologies include SuSteel (Sustainable Steelmaking), which is already delivering initial results on a pilot scale, and the globally unique Hy4Smelt demonstration plant, which is being built at the Linz site as an extension of the HYFOR pilot plant. In addition to these carbon direct avoidance technologies, which prevent the generation of CO<sub>2</sub> already in the process, processes for the capture, storage and utilization (CCUS) of unavoidable CO<sub>2</sub> emissions are also being developed. The further development and especially the implementation of these methods are research and resource intensive, requiring comprehensive applied basic research.

This research strategy addresses the IROs for the topics of breakthrough technologies, increasing recycling efficiency through technological innovation, and ensuring product quality with the increased use of scrap. It takes into account the interests of management, legislators, customers, and residents near the location and in communities neighboring the steel-producing companies, whose emissions are gradually reduced as a result.

## POLICY OVERVIEW

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
Product innovations	Strategic innovation guidelines	Own operations  Downstream value chain to a partial extent (in line with customer requirements)	Head of Group-wide Research & Development and Innovation	» The interests of customers, research institutions, employees, and candidates are taken into account  » External communication, e.g., at presentations
	Prioritized innovation roadmaps	Own operations to a partial extent  Downstream value chain to a partial extent (customer innovations)	R&D coordinator of the divisions  Approval in the annual research board under the leadership of the CEO	» The interests of customers, research institutions, universities, and management are taken into account  » External communication, e.g., at presentations
Breakthrough technologies  Ensuring product quality with increased use of scrap  Increased recycling efficiency through technological innovation	R&D for modular implementation of new technologies to achieve decarbonization targets	Own operations  Downstream value chain to a partial extent (in line with customer requirements)	Project managers of R&D sub-projects  Approval in the annual research board under the leadership of the CEO	» The interests of customers, legislators, neighbors and neighboring communities, and management are taken into account  » External communication, e.g., at presentations or through Group-wide communication on decarbonization

### I,R&D-2 – Actions and resources related to innovation, research & development

Research projects derived from the innovation roadmaps constitute the actions taken in the field of innovation, research, and development to address the related impacts, risks, and opportunities (IROs). For the business year 2025/26, six actions or packages of actions (five actions in Business Year 2024/25) have been identified that will contribute in particular to achieving the projects and objectives of the strategies related to R&D and innovation. Packages of actions refer to a set of several individual R&D projects that contribute to the fulfillment of an overarching priority topic.

Due to their high strategic relevance, two of these actions are also being managed as Group projects. In addition to individual projects, which are usually handled by a team of researchers who are assigned to a company or business unit in organizational terms, division-wide competencies are pooled in Group projects. Group projects address strategically important issues and are associated with high project costs and a higher project risk. This targeted cooperation accelerates implementation, thereby increasing efficiency. The following Group-wide R&D projects were undertaken in the business year 2025/26:

- » Sustainable products (project duration December 1, 2022 to November 30, 2025)
- » Simulation of complex (supply chain) networks (project duration April 1, 2024 to March 31, 2028)

In line with the voestalpine standard on monitoring the progress of Group research projects, the implementation of actions is monitored as follows:

- i) The definition of targets such as acquiring expertise, future income, or sales
- ii) Project controlling by a steering committee (quarterly)
- iii) Status report to the Management Board within the framework of the Research Board (annual)

A defined monitoring process applies to all projects that are not managed within the scope of Group projects: Monitoring of the implementation of the described actions is carried out within the scope of progress reporting for the entire R&D project portfolio. Milestones are defined and their achievement is monitored within the framework of project management and project controlling. Content, scheduling and cost aspects are taken into account in the process. If milestones are not reached, adjustments are made or the projects are prematurely stopped.

The actions and packages of actions are explained in detail below and are discussed with regard to impacts, risks, and opportunities. The stated R&D expenses are solely OpEx costs and the implementation of the projects is not subject to any preconditions. An exception is the Hy4Smelt initiative, to which CapEx expenses are also allocated but by definition are not part of (gross) R&D expenditure. A total of EUR 32.06 million (2024/25: EUR 19.36 million, OpEx only) was spent on the R&D projects in the past business year as a result of the actions listed above, of which EUR 26.13 million OpEx costs and EUR 5.93 million CapEx costs. OpEx costs represented 11.79% of total gross R&D expenditure (2024/25: 8.85%, based on the corresponding gross R&D expenditure). Similar levels of expenditure are also planned for the business year 2026/27 to ensure the ongoing implementation of planned projects.

#### **R&D FOR SUSTAINABLE PRODUCTS AND GROUP PROJECT “SUSTAINABLE PRODUCTS”**

The Group project “Sustainable Products,” which was launched in December 2022 and ended as scheduled in November 2025, contains 22 sub-projects focused on energy and mobility, products for agriculture and the food industry, and aspects to optimize products in the use phase. A total of 25 Group companies from all divisions were involved in the implementation of this action. Overall project management and coordination fell under the remit of the Metal Forming Division, which is also the division most involved in the sub-projects. By pooling expertise, sustainable products can be brought to market in a relatively short period of time and generate sales within a few years. For example, as part of a sub-project of the High Performance Metals Division, a complete process chain for high-quality tool repair was developed. In the Metal Forming Division, a pilot sub-project developed mounting structures for agrivoltaics, enabling the dual use of land for electricity generation and agriculture. In the final year of the project, a particular focus was placed on the orderly completion of the corresponding individual projects and finalization of the project documentation.

R&D expenditure for all sub-projects up to the end of the project came to EUR 9.58 million in the business year 2025/26 (2024/25: EUR 8.40 million). EUR 29.02 million was spent over the entire project period. This action focuses on the IROs of product innovations by integrating environmental requirements into the development of new products through R&D activities. This will strengthen both the competitiveness and the financial performance of voestalpine.

## **R&D FOR greentec steel—EXPERIMENTAL MELTING, DYNAMIC ALLOYING, AND ACTIVE INTERVENTIONS IN PRODUCTION PROCESSES**

The production of steel grades of consistent quality even after the transition from the blast furnace to the electric arc furnace route poses a major challenge, especially for the high-quality automotive and wire rod segments. The increasing proportion of scrap in the input material leads to an increase in the level of accompanying elements, which has direct impacts on mechanical properties such as the strength, ductility, and hardenability of the end product. R&D therefore focuses strongly on determining the relationship between the steel grade, the mix of input materials, and the resulting product characteristics.

The package of R&D actions for greentec steel, primarily processed by the Metal Engineering Division and the Steel Division, comprises the following focal points:

### **i) Experimental melts and experimental programs (Metal Engineering and Steel Division)**

The influence of the level of accompanying elements on the physical and chemical properties can be investigated through the targeted production of melts with a defined composition. These studies provide the basis for further experimental activities.

### **ii) Dynamic alloying (Metal Engineering and Steel Division)**

Since the exact composition of the scrap is known only after melting in the electric arc furnace, metallurgical counter-measures are necessary during the process. Dynamic alloying allows the alloy quantity to be adjusted so that the final properties of the product remain within specified limits.

### **iii) Forecast-driven process adjustments (Steel Division)**

Not only the material composition, but also the processing parameters have a significant influence on the final properties of the product. By purposefully adapting the process parameters in the last property-determining step, namely the annealing furnaces, material properties can be adapted to the specified limits.

Since 2021, the transition of the production routes on electric arc furnaces in Linz and Donawitz has been accompanied by intensive research. By the time the first electric arc furnaces are commissioned in 2027, the first intensive phase of R&D is scheduled to be completed. However, research activities to maintain product properties will continue in the years that follow. In the business year 2025/26, related research activities continued in order to make a significant contribution to the successful transition of the process routes.

The package of actions mitigates the risk of ensuring product quality in the case of higher levels of scrap due to the transition from the blast furnace route to the electric arc furnace route. The described R&D activities can minimize this risk, which is based on physical/chemical principles. The ability to react rapidly to the composition of input materials, in particular the proportion of accompanying elements in scrap, also improves recycling efficiency through technological innovation. A total of EUR 14.14 million (2024/25: EUR 9.26 million) was spent on the individual R&D projects for this key research focus in the past business year.

## **SIMULATION OF COMPLEX NETWORKS AND POST-CONSUMER SCRAP**

Scrap is already playing an essential role at voestalpine's production sites. Due to the limited availability of high-quality steel scrap on the world market, research activities are necessary both to increase the efficiency of recycling processes, especially for old scrap, and to venture into new scrap markets.

In particular, the conversion of process routes from blast furnaces to electric arc furnaces is accompanied by a sharp increase in scrap demand. The objectives of the “Simulation of complex networks” action are to understand and visualize the supply chains relevant to the voestalpine Group, to simulate and optimize the flow of scrap, as well as to simulate worst-case scenarios and develop remedies. The topic has been implemented as part of a Group project since April 2024 and is planned to run for four years. In the past business year, the planned milestones were achieved, with a particular focus on gaining an understanding of multi-sectoral and multi-regional dependencies as well as on the advanced modeling of the rail system. In the past business year, EUR 0.33 million was spent (2024/25: EUR 0.22 million).

In other individual projects, the voestalpine experts are intensively researching the treatment and use of scrap, otherwise known as post-consumer scrap. Compared to new scrap, which is produced as waste during punching, for example, the use of post-consumer scrap, which is often mixed with other materials, can present a number of challenges. Composite materials and other non-metallic components need to be separated in a complex process before further processing. The KIRAMET project (artificial intelligence-based recycling of metal composite waste), for example, involves working with partners from academia and industry on AI-based solutions for processing these material flows. In the project consortium, voestalpine is responsible for classifying reprocessed scrap with innovative sensor- and model-based solutions, and investigating the impact of this on the production of high-quality steel products. During the project period from July 1, 2023 to December 31, 2026, the aim is not only to increase the added value of secondary raw materials; networking between industrial companies will also enable holistic management of the recycling chain.

The projects listed in this package focus on the IROs related to increasing recycling efficiency through technological innovation. By systematically analyzing scrap streams and gaining an understanding of the relevant supply chains, active steps can be taken to ensure a stable supply of materials. In addition, the targeted processing of old scrap can open up additional material sources and significantly increase resource efficiency.

#### **APPLICATION OF SUSTEEL TECHNOLOGY AND OPERATION OF THE SUSTEEL PILOT PLANT IN DONAWITZ**

A trial project is currently being undertaken in the SuSteel (sustainable steel) test plant at the voestalpine Stahl Donawitz GmbH site: the production of crude steel using hydrogen plasma in a single process step. In this CO<sub>2</sub>-free method, in which only steam is produced as a by-product, the intermediate stage of pig iron can be completely bypassed. In addition to voestalpine Stahl GmbH and voestalpine Stahl Donawitz GmbH, two long-term academic cooperation partners, namely K1-MET and the University of Leoben, are also involved in the implementation of this project.

In the past business year, R&D expenses of EUR 0.86 million (2024/25: EUR 0.89 million) were incurred for individual projects related to SuSteel technology. The SuSteel test plant, which has been successfully operating since 2021, demonstrates that the single-stage reduction of iron ores using hydrogen is an important alternative to fossil-based reducing agents such as coke, coal, or natural gas. The experimental findings on this breakthrough technology will also be of great importance, especially in the third stage of the successively implemented decarbonization plan to achieve net-zero emissions by 2050. The main research priorities in the past business year were, in particular, securing the supply of hydrogen and improving gas recovery. The package of actions is based entirely on the IROs for the application of the breakthrough technologies and makes a key contribution to building the necessary expertise for steel production with net-zero emissions by further developing hydrogen-based processes.

## **Hy4Smelt DEMONSTRATION PLANT—COMBINING HYFOR TECHNOLOGY WITH THE SMELTER PROCESS**

Since fall 2025, construction of the world's first demonstration plant, Hy4Smelt has been underway at the voestalpine site in Linz. The plant will be able to combine hydrogen-based direct reduction for ultrafine iron ores using HYFOR technology with an electric melting process (smelter). This project is being undertaken on the basis of the results from the HYFOR pilot plant, which is being operated at the voestalpine Stahl Donawitz GmbH site in partnership with partners from the worlds of industry and academia. HYFOR technology (hydrogen-based fine-ore reduction) enables the direct reduction of ultrafine iron ores in a fluidized bed using 100% green hydrogen without prior sintering or pelleting. The direct reduced iron (DRI) is melted in the smelter using electricity from renewable sources under a protective atmosphere. This results in the end product of granulated pig iron (GPI), which can be used and further processed in electric arc furnaces and LD converters. The green hydrogen required for the reduction step is generated directly at the Linz site through hydrogen electrolysis in the H2FUTURE pilot plant.

The groundbreaking ceremony for this demonstration plant took place on September 2025 and commissioning is planned for the end of the calendar year 2027. The research project, which runs until 2030, is being implemented by voestalpine Stahl GmbH and voestalpine Stahl Donawitz GmbH, together with the international plant manufacturer Primetals Technologies, and Rio Tinto, one of the world's largest mining groups. The K1-MET metallurgical competence center is the lead scientific partner on the project.

The total planned expenditure for the project is approximately EUR 170 million, of which voestalpine's share is EUR 41.8 million. Hy4Smelt is co-financed by Austrian (aws/Twin Transition and KPC/Transformation der Industrie) and European (RFCS/Clean Steel Partnership and Clean Hydrogen Partnership/Hydrogen Valleys) funding bodies. The R&D expenditure (OpEx) for the preparatory projects in the HYFOR package amounted to EUR 0.80 million in the business year 2025/26 (2024/25: EUR 0.59 million). With the start of implementation in the reporting year, the CapEx expenses in the business year 2025/26 amounted to EUR 5.93 million. The Hy4Smelt measure relates entirely to the IROs related to breakthrough technologies. The research into and construction of the demonstration plant marks an important intermediate step on the path to scaling up hydrogen-based technologies for steel production and establishing the corresponding technological basis.

## **CARBON CAPTURE AND UTILIZATION (CCU) – CROSS-SECTORAL DEMONSTRATION WITH THE ZEUS PROJECT**

Hydrogen-based steel production methods, such as SuSteel or Hy4Smelt, are considered carbon direct avoidance technologies through which the generation of CO<sub>2</sub> emissions is avoided by the use of hydrogen as a reducing agent. However, unavoidable residual emissions are also generated as a result of the overall process; these can be actively converted into usable products through carbon capture and utilization (CCU). In the cross-sectoral flagship project ZEUS (Zero Emissions through Sector Coupling), voestalpine Stahl GmbH is demonstrating a climate-neutral process chain with partners from academia and industry. The corresponding steps include the production and processing of green hydrogen under fluctuating process conditions, the capture of CO<sub>2</sub> from industrial waste gases and its subsequent conversion into valuable and storable products. An amine scrubber is used for the capture, with various solvents and membrane concepts being investigated. The conversion takes place, for example, in the methanation plant in which CO<sub>2</sub> is converted into synthetic methane (CH<sub>4</sub>) using hydrogen in a catalyst. The methane is then fed back into the circuit. In a pilot plant that went into operation at the start of the 2026 calendar year, the electrochemical conversion of CO<sub>2</sub> into synthesis gas that can then be used as a reducing agent is being tested.

In addition to the value chain within voestalpine's own operations, the project is exploring the integration of the energy, hydrogen, steel, and cement industries into a continuous process chain. The project was launched at the beginning of October 2023 and runs for four years. The corresponding (gross) R&D expenditure came to EUR 0.42 million in the business year 2025/26 (2024/25: EUR 0.15 million). ZEUS is funded by the Climate and Energy Fund and is being carried out as part of the Energy Research Program 2022. The measure relates entirely to IROs for breakthrough technologies and contributes to achieving the long-term target of net-zero emissions by 2050.

## OVERVIEW OF ACTIONS

IROs addressed	Action	Time horizon	Scope of the action	Significant expenditure (if relevant)/ other comments
Product innovations	Package of measures: R&D for sustainable products and Group project "Sustainable Products"	December 2022 – November 2025	Own operations to a partial extent	EUR 9.58 million OpEx (Group project)
			Downstream value chain to a partial extent	Inclusion of customer interests
Ensuring product quality with increased use of scrap	Package of R&D measures for greentec steel: experimental melting, dynamic alloying, and active interventions in the production process	2021 – 2027 (Phase 1)	Own operations to a partial extent  Downstream value chain to a partial extent	EUR 14.14 million OpEx  Inclusion of the interests of customers and legislators
Increased recycling efficiency through technological innovation	R&D Group project "Simulation of complex networks" and post-consumer scrap	April 2024 – March 2028	Own operations to a partial extent  Upstream and downstream value chain to a partial extent	EUR 0.33 million OpEx (Group project)  Inclusion of the interests of customers, suppliers, research institutes, and universities
Breakthrough technologies	Package of measures: Application of SuSteel technology and operation of the SuSteel pilot plant in Donawitz	Ongoing; application particularly during Phase 3 of the Climate Transition Plan	Own operations to a partial extent	EUR 0.86 million OpEx  Inclusion of the interests of customers, research institutions, and universities
	Package of measures: Hy4Smelt – combining HYFOR technology with the smelter process	Ongoing; application particularly during Phase 3 of the Climate Transition Plan	Own operations to a partial extent	EUR 0.80 million OpEx EUR 5.93 million CapEx  Inclusion of the interests of customers, research institutions, and universities
	Carbon capture and utilization (CCU) – cross-sectoral demonstration with the ZEUS project	Ongoing; application particularly during Phase 3 of the Climate Transition Plan	Own operations to a partial extent	EUR 0.42 million OpEx  Inclusion of the interests of customers and legislators

## METRICS AND TARGETS

### I,R&D-3 – Targets related to innovation, research R&D development

In light of its overarching role within the voestalpine Group, research, development and innovation forms a link between Group-wide sustainability goals and process and product innovations. The findings from numerous R&D related actions not only affect quantifiable targets, but must also be considered in the context of manufacturing processes. Process innovations in relation to the green transformation contribute significantly to reducing CO<sub>2</sub> emissions; but the savings cannot be attributed exclusively to R&D and innovation. Success in setting up and further developing the circular economy at all voestalpine locations largely depends on progress in development. As it is not possible to view this as an isolated factor, no R&D-specific measurable and outcome-oriented targets have currently been defined.

The effectiveness of the R&D projects set forth in the innovation roadmaps, which address material impacts, risks, and opportunities for voestalpine, is subject to a Group-wide guideline for assessing benefits. This ensures that all project benefits undergo consistent, transparent, and accountable monetary and non-monetary assessment, verification, and tracking in relation to R&D and innovation. As part of assessing benefits, a distinction is made between pre-project (ex-ante) and post-project (ex-post) evaluation. For projects that cannot be assessed in monetary terms, ex post checks are carried out to determine whether the planned intangible benefits have been achieved and whether the resulting projects have resulted in product or process developments. The knowledge gained in the course of this process is used to plan and manage future R&D projects in order to promote continuous improvement and strengthen the company's innovative power.

### I,R&D-4 – Metrics related to innovation, research, and development

Researchers play a central role in the success of innovation, research activities, and development. In the business year 2025/26, 832 people (2024/25: 786 people) at the various voestalpine sites conducted research on innovative products and improved processes on an ongoing basis. In doing so, they made a significant contribution to achieving the company's environmental objectives. The number of employees in R&D corresponds to the total number of employees (headcount) who are directly assigned to the R&D departments of the individual Group companies. Employees who are involved in R&D projects but assigned to other areas are not included in this figure. In recent business years, the number of employees in R&D and innovation has steadily increased.

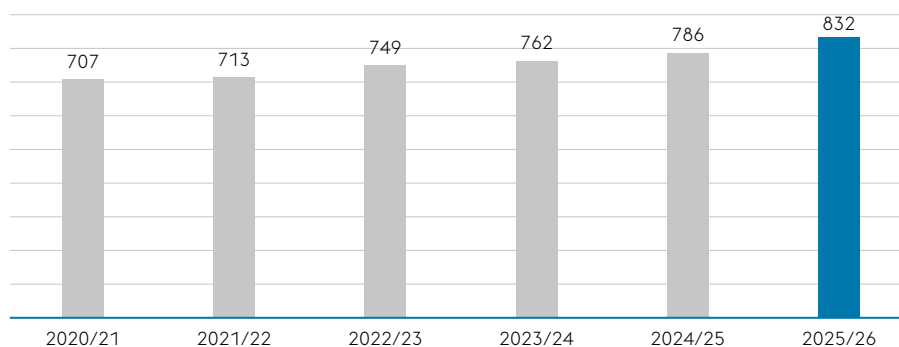
The high number of employees in R&D is accompanied by high R&D expenditure (gross). In the business year 2025/26, EUR 221.61 million (2024/25: EUR 218.89 million) was spent on research and development activities, reinforcing the key role of these activities in the business model of the voestalpine Group. A significant proportion of R&D expenditure is invested in projects that increase the sustainability of voestalpine processes and products in the long term. A slight increase in the R&D budget is planned in the 2026/27 business year. The (gross) R&D expenses are also included in Note B.3. Significant accounting policies in the notes to the Consolidated Financial Statements.

Total R&D expenses (gross) are calculated as the sum of the R&D expenses (gross) of all companies involved in R&D. R&D expenditure (gross) includes all expenses (directly attributable costs excluding VAT) for all R&D activities in the business year, which can be undertaken as part of the R&D program, regardless of whether they are carried out in the dedicated R&D departments or in other areas. These include personnel costs (salaries) and direct expenses for R&D (such as material costs, travel costs, use of infrastructure, and third party costs). Depreciation on fixed assets and patent application and maintenance costs are not included.

No assumptions or estimates are made for the calculation of either parameter, there are no limitations and, due to the low complexity of the computation, no validation is performed by external bodies. The two metrics are recorded in the OneStream consolidation tool. The responsibility for data entry lies with the respective consolidation tool officers in the Group companies. The accuracy of the data is verified by internal bodies (R&D managers and controlling) as part of a multi-stage review and approval process, and no external bodies are involved in the reporting.

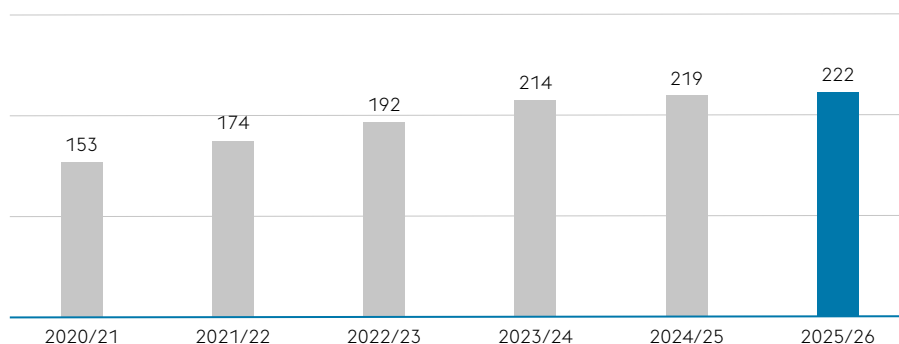
## NUMBER OF EMPLOYEES IN RESEARCH AND DEVELOPMENT

In each case as of the March 31 reporting date



## EXPENDITURE FOR RESEARCH AND DEVELOPMENT

In millions of euros



## OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the assumptions and methodology	Information on sources of a high level of measurement uncertainty and information on measurement
I,R&D (entity-specific topic)	-	R&D expense (gross)	Sum of R&D expenses (gross) for all companies involved in R&D. R&D expenditure (gross) includes all expenses (directly attributable costs excluding VAT) for all R&D activities in the business year, which can be undertaken as part of the R&D program, regardless of whether they are carried out in the dedicated R&D departments or in other areas	Limited—data represents the individual companies
I,R&D (entity-specific topic)	-	Number of employees in R&D	The number of employees in R&D corresponds to the total number of employees (headcount) who are directly assigned to the R&D departments of the individual Group companies	Limited—data represents the individual companies

# SOCIAL INFORMATION

## ESRS S1 OWN WORKFORCE

voestalpine is committed to providing a working environment based on the values of fairness, safety, and mutual respect. The company's approach revolves around the principles of offering optimal working conditions, treating all workers equally, and actively promoting equal opportunities. Diversity is considered a strength—whereby everyone is equal regardless of gender, age, origin, or other traits. voestalpine is also committed to respecting labor-related rights throughout its entire value chain. These principles form the basis for sustainable growth.

The following table provides specific information on SBM-3:

Topic/sub-topic/sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Working conditions and other work-related rights	● Attractive working conditions	voestalpine offers attractive salaries and benefits as well as flexible working hours which promotes employee retention.	>>>	●●●●	Employees and non-employees NGOs and NPOs
	● Healthy and safe working conditions at voestalpine	voestalpine strengthens the safety and health of its workforce through comprehensive occupational health and safety management, as well as periodic training and awareness-raising activities that enhance well-being and improve the capacity to identify risks and apply protective measures.	>>>	●●●●	Employees and non-employees
Health and safety	● Accidents at work, injuries, and occupational illnesses	voestalpine employees are exposed to occupational hazards and risks that can cause accidents, injury, illness, or disease due to the industry, the nature of their job, or the environment in which they work. Regular risk assessments and the definition of protective measures reduce the severity of incidents and/or likelihood of occurrence.	>>>	●●●●	Employees and non-employees

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Equal treatment and opportunities for all	● Equal opportunities for all employees	Increasing employee satisfaction and retention as well as promoting equal opportunities for all employees through an inclusive and diversity-promoting HR strategy, especially with regard to diversity. This topic is anchored as a prioritized strategic field of action in the HR Strategy 2030+.	>>>	●●●●	Employees
Training and skills development	● Personal development and training	In addition to the basic training, many different continuing education programs are offered to promote the professional and personal development of all employees (educational programs provided by individual companies, divisional and Group specialist academies, and management programs). voestalpine is an important provider of apprenticeships, particularly in the DACH region. This helps to promote the personal and professional development of employees and improve employee satisfaction.	>>>	●●●●	Employees

**Key**

● Actual positive impact   ● Actual negative impact   ○ Potential positive impact   ○ Potential negative impact   + Opportunity   ! Risk  
 >>> Upstream   >>> Own operations   >>> Downstream   ●○○○ < 1 year   ●●○○ 1-5 years   ○●○○ 5-10 years   ○○○● 10+ years

## IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

### S1-1 – Policies related to own workforce

In its strategic orientation, voestalpine pursues a holistic approach toward responsibility for its employees. Policies that address the company’s own workforce are designed to create a safe, fair, and conducive working environment in which employees can unfold their potential. These policies are based on the Group-wide HR Strategy 2030+, which addresses material impacts and systematically reacts to changes in the economic, social, and technological environment.

## HR STRATEGY 2030+

The HR Strategy 2030+ aims to strengthen voestalpine's position as an attractive employer and to make a decisive contribution to the company's competitiveness by acquiring, developing, and retaining qualified and motivated employees in the long term. This objective is taken directly from the voestalpine Group Strategy 2030+. The HR strategy covers all voestalpine employees at all its companies throughout the Group.

In order to remain competitive in the face of an ever-changing environment and to continue offering employees an attractive working environment, the HR strategy, which was first established in 2017, is reviewed every two to three years. This review is carried out in cooperation between the HR managers of the divisions and Group HR Management. An environmental analysis is conducted on the basis of the Group strategy to identify the critical success factors, review their alignment with the HR mission statement, and translate them into concrete spheres of action.

The HR Strategy 2030+ addresses a number of IROs. Material positive impacts include attractive working conditions, safe and healthy jobs, promoting equal opportunity, personal development, and employee training. Material negative impacts include accidents at work, injuries, and occupational illnesses.

The environmental analysis identified the following key challenges for the coming years: demographic change and labor shortages, a change in the values of existing and future employees, increasing awareness of sustainability and environmental protection, and technological advancements and digitalization. These developments can influence the critical success factors on which HR bases its strategic spheres of action.

As part of the HR Strategy 2030+, the critical success factors define the key fields of action for positioning voestalpine as a forward-looking employer. The focus in this regard is on the long-term retention of qualified and motivated workers and on creating a working environment that promotes diversity, security, and development opportunities. This includes, first of all, targeted positioning of voestalpine as an attractive employer. In addition to traditional employer branding measures, the emphasis is on promoting women, expanding diversity, and improving apprenticeships. Closely related to this is the topic of identity and changes in values, which covers aspects such as work-life balance, life-phase oriented work models, and sustainability.

Another focus is on developing an inclusive corporate culture. Diversity is promoted throughout the Group and a particular focus is placed on the issue of female empowerment. Talent management also plays a central role: by introducing global standards, high-performance talented individuals are to be systematically identified, further developed, and retained at the company in the long term. voestalpine also pursues a comprehensive health management strategy with measures to promote health and safety at work.

In order to prepare employees for ongoing changes, structures and competencies in the area of change management are being improved. Efficient HR processes and targeted use of modern technologies help to increase both quality and efficiency. In order to expand HR IT systems, a transformation for the further digitalization of global HR processes was launched.

### Strategic spheres of action

In order to implement its strategy, voestalpine is working eight strategic spheres of action across the Group. These spheres represent key levers for achieving the HR objectives:

- 1. Values and culture management:** active management of corporate values to keep up with technological advancements and social change.
- 2. Employer branding:** strengthen voestalpine's position as a credible and attractive employer through targeted group-oriented measures.
- 3. Female empowerment:** increase the percentage of women at all qualification levels, especially in leadership positions.
- 4. Employee development:** ensure that the workforce is prepared to meet current and future challenges.
- 5. Leadership:** develop a standardized Group-wide leadership model that integrates the voestalpine values.
- 6. Health and safety:** achieve the vision of zero work-related accidents and no occupational illnesses.
- 7. Corporate HR processes:** standardize processes to enhance the corporate identity and increase efficiency.
- 8. HR IT systems:** develop an HR IT roadmap to support HR processes and increase efficiency.

These topics are dealt with either in specially established cross-divisional working groups or in existing competence teams, sometimes with external support.

#### IN FOCUS: FEMALE EMPOWERMENT

voestalpine has set itself the goal of increasing the proportion of women in management positions from 14% to 18% by 2030. Particular attention is also paid to activities on three levels: positioning, retaining, and guiding/empowering/supporting women. As an attractive employer, voestalpine's aim is to pique women's interest in working at the Group, to inspire them over the long term, and to enhance their professional and personal development.

## HUMAN RIGHTS POLICY

voestalpine is fully committed to respecting and upholding human rights, including those of its employees. The Human Rights Policy (<https://www.voestalpine.com/group/en/group/sustainability/human-rights-policy/>) and the company's Code of Conduct (see chapter G1-1), point 5 "Social Responsibility," explicitly call for respecting human rights. Notably, the Code of Conduct states the following:

*The corporate culture of voestalpine acknowledges and welcomes the fact that each person is unique and valuable and shall be respected for their individual abilities. We regard human rights as fundamental values that must be observed by all employees, in accordance with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, and the core labor standards of the International Labor Organization (ILO).*

Since 2013, voestalpine has supported the UN Global Compact (UNGCC) whose ten principles stipulate fundamental duties with respect to human rights, work, the environment, and the fight against corruption. For more information on the UNGCC, please refer to chapter ESRS 2.

Within the scope of the Group-wide human rights program, human rights risks were systematically documented, reviewed, and prioritized in a Group-wide risk catalog, both for the company's own operations and the entire supply chain. Concrete measures to minimize risk were then defined on this basis. The updated Human Rights Policy published in March 2023 specifies the Group-wide standards and sets binding expectations for addressing human rights issues. The Human Rights Policy makes this commitment concrete and lays down binding guidelines for employees and business partners. It was developed together with external experts and civic organizations, and was approved by the Management Board of voestalpine.

The voestalpine Human Rights Policy addresses the following issues:

## HUMAN RIGHTS POLICY

Training of employees and security personnel	Right to collective bargaining and freedom of association	Fair wages and working hours	Prohibition of child labor
Prohibition of forced and compulsory labor, human trafficking, and modern slavery	Rights of indigenous peoples	Diversity, equal opportunities, and ban on discrimination	Human rights in the supply chain
	Reports of violations	Human Rights Officer	

Internally, the Human Rights Policy is aimed at all Group companies. It therefore covers all voestalpine workers, who the company actively involves in the implementation of measures in relation to labor and human rights. The following points are of particular importance when it comes to employees:

#### **Training on human rights**

To raise awareness of human rights, an online training program was developed in cooperation with a renowned and independent non-university research institution for fundamental and human rights. For more information on human rights training, see chapter S1-4.

#### **Training of security staff**

The security staff of the works security service consists predominantly of the company's own employees, who are subject to the voestalpine Code of Conduct. The Code of Conduct for business partners applies to external security staff. Both documents mandate compliance with human rights. voestalpine provides human rights training for its own employees; external security personnel are trained by their own employers.

#### **Collective bargaining and the right to freedom of association**

voestalpine champions every employee's freedom and their right to join unions. The majority of all the voestalpine Group's employees are in an employment relationship that is governed by collective agreements or comparable industry-wide agreements. In addition, there is a European Works Council and a Group Works Council in place with an established basis for dialog with management (see chapter S1-2).

#### **Compensation and working hours**

Working hours must comply with national legislation and prevent employees from experiencing excessive physical and mental fatigue. Employees must be entitled to at least one day off per week. Employees must be compensated in accordance with applicable legal regulations and collective agreements, and this compensation must be sufficient to meet the basic needs of both employees and their families and to provide them with a decent standard of living.

#### **» Employee-equitable organization of working hours**

In accordance with the criteria of ResponsibleSteel (valid for the certified companies at the site in Linz), voestalpine attaches great importance to the employee-equitable organization of working hours which takes health and social interests into account to the greatest possible extent.

In line with the voestalpine Code of Conduct, clear guidelines are set for employee working hours, which comply with legal requirements and counteract excessive mental and physical fatigue of workers. For example, voestalpine is committed to complying with the statutory maximum working time limits and has an effective internal control system in place. When it comes to the organization of shifts, the protection of the health and social interests of our employees is a priority. New shift models are always introduced in consultation with the workers' representatives. For example, as in the previous year, 61% of our blue-collar employees already work in shifts in part-time models, guaranteeing significantly longer blocks of time off between shifts than required by law.

When overtime is mandated, the interests of employees are also taken into account, including beyond the employees' statutory rights of refusal. The right of employees to choose between overtime payment in the form of money or time off in lieu is not only guaranteed in the cases provided for by law, but also granted to employees beyond that, subject to operational feasibility. The organization of work at voestalpine ensures that the prescribed rest breaks are adhered to throughout, with the legal requirements applied as the minimum standard. This ensures employees are able to take meals and rest in all areas.

With regard to the granting of paid leave, the annual leave of three weeks required by Responsible-Steel as a minimum standard is already exceeded by the provisions of the Austrian Leave Act (*Urlaubsgesetz—UrlG*), which stipulates minimum leave of at least five weeks. Additional days off work are granted at voestalpine both through collective agreements and internal company regulations.

#### **Child labor, forced and compulsory labor, human trafficking, and modern slavery**

voestalpine categorically rejects any form of child labor. Care is taken to ensure that the employment of young people does not jeopardize their health, safety, or development.

voestalpine does not tolerate any form of forced or compulsory labor, human trafficking, or modern slavery. This also includes the withholding of identification documents and passports, restrictions on the freedom of movement, and debt bondage. Both the voestalpine Code of Conduct and the company's Code of Conduct for Business Partners explicitly mention and expressly prohibit human trafficking and modern slavery.

#### **Diversity, equal opportunities, and ban on discrimination**

voestalpine is committed to respecting all people irrespective of gender, skin color, nationality, ethnicity, religion or worldview, disability, age, sexual orientation, and identity. This commitment and corresponding actions promote a climate of acceptance, equal opportunity, and mutual trust. As laid out in the "Respect and Integrity" chapter of the voestalpine Code of Conduct, the Group does not tolerate any form of discrimination. The HR Strategy 2030+ also addresses discrimination and equal opportunity in its strategic spheres of action.

#### **Reports of violations**

Reports of human rights violations or breaches of the above-mentioned international guidelines can always be submitted in person to supervisors, the local or Group Human Resources departments of voestalpine AG, and the executive management. Violations can also be reported to the Human Rights Officer at the e-mail addresses [humanrights@voestalpine.com](mailto:humanrights@voestalpine.com) and [menschenrechte@voestalpine.com](mailto:menschenrechte@voestalpine.com) or anonymously using voestalpine's online whistleblower system. This is available at <https://www.bkms-system.net/voestalpine>. Further information on the whistleblower system can be found in chapter G1-1.)

## **GROUP health & safety POLICY AND THE SAFETY CODE**

Maintaining the health and safety of our workforce is a top priority at voestalpine and is firmly anchored in the company's core values. voestalpine employees are exposed to occupational hazards and risks that can cause accidents, injury, illness, or disease due to the industry, the nature of their job, or the environment in which they work. Our goal is to ensure that no one in our workforce suffers work-related accidents or illnesses. To this end, we continuously assess the risks posed by employees' activities, e.g., in handling machinery or hazardous materials, derive measures from this and train, sensitize, and empower our employees to counter the risks. More information can be found in chapter S1-5. Protecting the health of the company's own workforce is also a key element of the voestalpine sustainability and corporate strategies.

Group-wide health and safety management is undertaken by the Group health & safety Department, which is directly linked to a member of the Management Board. Led by the chief health & safety officer, the department coordinates Group-wide activities and supports cross-divisional cooperation. In close coordination with the health & safety Committee—a body comprising representatives from all four divisions and the Group Works Council—it develops and implements measures to continuously improve the culture of safety.

In the business year 2023/24, a Group-wide Safety Code was introduced. It supplements the Group's health & safety Policy, which has been in place since 2021 and sets minimum standards applicable throughout the Group. The implementation of these standards is binding for all sites—regardless of local statutory requirements.

The Group-wide Safety Code forms an integral part of the measures taken to improve the culture of safety at all voestalpine companies. It is based on the principle that “safety is non-negotiable and takes precedence over quality and production”—for example, by systematically stopping production if conditions are unsafe. The code was drawn up by the health & safety Committee—consisting of divisional managers and members of the Works Council—under the leadership of the Chief health & safety Officer (CHSO). It was approved by the Group Management Board within the framework of the health & safety Board.

The code is implemented across the Group by the committee members responsible for the divisions, (technical) managing directors, and safety managers. Internal communication includes, for example, the initiative “Ja Sicher Lok” at the Linz site, targeted information for managers, and notebooks for shop floor employees and their supervisors. The Safety Code is available digitally on the intranet via the website “Corporate health & safety.”

## OCCUPATIONAL SAFETY MANAGEMENT SYSTEMS

Occupational safety management at voestalpine is based on the requirements of the internationally recognized ISO 45001 standard. The production companies run their own occupational safety management systems, but orient them on the Group-wide framework.

Each division has its own committees responsible for operational implementation. The committees are made up of (technical) executives, safety managers, and other divisional managers. Strategic management is carried out centrally in line with the existing board structure. Within the divisions, the respective management boards coordinate operational implementation to ensure effective and consistent application of the safety standards.

All voestalpine production sites have systematically integrated all relevant occupational safety requirements into their local processes.

Of the employees at key production sites, 89.3% are covered by certification according to ISO 45001 or an equivalent national standard.<sup>1</sup> Implementation of measures is carried out by trained safety staff and occupational safety representatives, 80% of whom come from within the company. At smaller sites, their expertise is supplemented by external qualified workers where necessary.

In order to identify and introduce preventive measures to improve occupational safety, unsafe situations and near-misses are systematically documented and analyzed. A central web tool is used to document and assess the implementation of health and safety standards on an annual basis. The results are made available to select committees and incorporated into the continuous improvement process. In addition, regular internal and external audits are carried out to verify the effectiveness of the actions taken.

The relevant guidelines and documents are available throughout the Group on the intranet ("Corporate health & safety") and on the voestalpine website. Senior executives and safety workers are regularly updated on the latest developments.

<sup>1</sup> Calculation of metric revised vs. previous year (see BP-2 for details).

## POLICY OVERVIEW

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
All IROs for S1	HR Strategy 2030+	Own operations All employees Specific stakeholder groups: women	HR Board	<ul style="list-style-type: none"> <li>» Respect for the Diversity Charter</li> <li>» Involvement of stakeholders through environmental analysis and ongoing participation in working groups and competence teams</li> <li>» Communication on employee webpages, on the external podcast, and at Supervisory Board meetings</li> </ul>
Attractive working conditions	Human Rights Policy	Own operations Own workforce (employees and non-employees) Upstream and downstream value chain (all business partners)	Head of Group Sustainability	<ul style="list-style-type: none"> <li>» Available on the website</li> </ul>
Healthy and safe working conditions at voestalpine  Accidents at work, injuries, and occupational illnesses	Group health & safety Policy and the Safety Code	Own operations Own workforce (employees and non-employees)	Management boards of the divisions	<ul style="list-style-type: none"> <li>» Prepared by the health &amp; safety Committee and approved by the Management Board</li> <li>» Available on the intranet as well as internal information for safety managers</li> </ul>
Healthy and safe working conditions at voestalpine  Accidents at work, injuries, and occupational illnesses	Occupational safety management systems	Key production locations Own workforce (employees and non-employees) Upstream value chain to a partial extent through the acquisition of external specialists	Divisional representatives in the health & safety Committee	<ul style="list-style-type: none"> <li>» Division-specific communication, managed by the divisional management boards</li> </ul>

## S1-2 – Processes for engaging with own workers and workers' representatives about impacts

voestalpine relies on the continuous dialog that it maintains with its employees and their representatives in order to systematically integrate their perspectives into business decisions. The responsibility for controlling these processes lies with the Group's Human Resources Management in close cooperation with the respective managers. The exchange is based on established formats such as employee surveys, structured feedback discussions, and regular consultations with the Works Council at the local, divisional, and Group levels. Aspects such as diversity, inclusion, and equal opportunity are also taken into account in order to maximize the range of perspectives, including in particular those of potentially disadvantaged groups. The effectiveness of the engagement is continuously reviewed through response rates, benchmarks, and the implementation and impact of measures derived from the surveys.

### GROUP-WIDE EMPLOYEE SURVEY

At voestalpine, employees are regularly engaged in strategically relevant issues through a Group-wide survey, among other initiatives. Following the Group-wide employee survey in fall 2024, the participating companies launched the planned review process. This included analyzing the results and deriving suitable measures. By June 2025, a total of 208 companies had reported their prioritized measures in the Group-wide standardized reporting tool, which facilitates transparent communication by enabling data to be entered in English and providing full visibility across all units. Although each company was required to report only the two most important measures, some took the opportunity to list additional activities. A total of 450 measures were recorded—slightly more than after the 2022 survey.

In addition to the key engagement value, which describes the employees' sense of connection to the company, the reported measures primarily concern the topics of appreciation, cooperation, and teamwork. The majority of the measures (81%) are ongoing and 82% relate to all employees (no distinction between white collar, blue collar, apprentices/trainees, etc.).

The results collected by the first reporting date were communicated to the Management Board of voestalpine in July 2025. The survey on the implementation status of the actions started in March 2026. In addition, the group-wide review process includes reporting to the respective supervisory and/or advisory boards as well as ongoing communication to the workforce.

The next voestalpine employee survey will take place in around 50 countries and 26 languages in fall 2026, and will be conducted jointly with an external partner.

### APPRAISAL DIALOG

The appraisal dialog is a key employee development tool and an integral part of the voestalpine leadership culture. It facilitates a structured dialog between managers and employees, and creates a binding framework for feedback, development opportunities, and target agreements. Performance reviews are mandatory for all salaried employees (white collar workers) throughout the Group. For waged employees (blue collar workers), specific formats such as team member interviews are recommended but are not mandatory.

During the employee performance review, individual targets and associated actions as well as development measures are defined and documented in the employee performance review report. The agreements reached are then jointly reviewed at the next performance review. In the business year 2025/26, 34,904 (2024/25: 34,648) employee performance reviews were conducted across the Group, of which 19,456 (2024/25: 19,117) were with waged employees and 15,448 (2024/25: 15,531) with salaried employees.

### **SOCIAL DIALOG WITH WORKERS' REPRESENTATIVES**

The social dialog at voestalpine to engage with the company's own workforce and their representatives forms a central part of the company's philosophy and practice. voestalpine is committed to its responsibility to involve the Works Council in business decisions, especially with regard to issues that directly affect the interests of employees.

The legal framework for participation varies around the globe, resulting in different configurations of the works council structures in the countries and regions where voestalpine operates. Regardless of this, voestalpine AG pursues a consistent HR philosophy that aims to involve employees in projects and decisions to an appropriate extent. Depending on the situation and the occasion, voestalpine AG relies on established procedures for information, consultation, and participation:

- » **Information:** proactively sharing relevant company information with the works council.
- » **Consultation:** dialog and exchange of views with the works council, whereby the company listens to the council's position but independently comes to a decision.
- » **Participation:** decisions can only be made with the approval of the works council.

A regular exchange between the executive management, HR, and works council (if available) is recommended throughout the Group. Regular meetings (jour fixe) between management and workers' representatives take place at the companies with works councils. The results of these meetings form the basis for operational decisions.

At Group level, the Steering Committee of the Group Works Council and the Group Management Board meet at regular intervals. Monthly meetings are also held between representatives of the Group Works Council and Group Human Resources management. They cover HR issues of strategic and cross-divisional importance at the meetings. In addition, regular exchanges take place at division level between divisional management, divisional HR and the respective works council.

The **Group Works Council**, as a statutory union of all the works council bodies of the voestalpine Group in Austria, represents the common economic, social, health, and cultural interests of the employees throughout the Group. Its highest governance body is the delegates' conference, consisting of seconded members from the companies' works councils. The delegates' conference adopts the work program and guidelines for the steering committee, appoints representatives to the Supervisory Board of voestalpine, and nominates the Austrian delegates to the European Works Council. The steering committee manages the day-to-day business of the Group Works Council and conducts negotiations with Group Management.

The **European Works Council** is an information committee responsible for representing employees at the European level. Delegates from seven European countries meet roughly twice a year to discuss cross-border issues relating to the Group's employee representation.

Workers' representatives are provided with the necessary financial and human resources in line with the statutory regulations applicable in the respective countries. Aside from the existing institutional arrangements established at national and European level, there is currently no Group-wide framework agreement in place with workers' representatives that applies to all sites worldwide. This also applies to agreements relating to respect for human rights in the working environment. However, voestalpine AG ensures that relevant national and international requirements are complied with in the respective countries and addressed within the framework of the existing participation structures.

### **EMPLOYEE SHAREHOLDING SCHEME**

voestalpine AG has had an employee shareholding scheme since 2001, which has been continuously expanded since then. In addition to Austrian employees, employees in the United Kingdom, Germany, the Netherlands, Poland, Belgium, Czechia, Italy, Switzerland, Romania, Spain, and Sweden are also involved in the scheme.

The voting rights from the employee shares are bundled in the voestalpine Mitarbeiterbeteiligung Privatstiftung (employee foundation for the Group's employee shareholding scheme), which makes it a stable core shareholder of voestalpine AG. As a central method for employee engagement, the employee shareholding scheme promotes long-term employee retention through active participation and giving them a say at the Annual General Meeting. As of March 31, 2026, a total of around 25,800 (2024/25: 26,600) employees held shares in voestalpine AG. They hold around 25.0 million (2024/25: 26.3 million) shares, which equates to 14.0% of the company's share capital (2024/25: 14.7%) due to the general bundling of voting rights.

### **S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns**

voestalpine AG relies on a structured process to address and reduce material negative impacts to its own workforce. This includes collecting feedback from various sources, analyzing the results and implementing targeted remedies. It is based on a systematic approach that involves regular reviews as well as continuous feedback processes and clearly defined reporting channels. When material negative impacts are identified, targeted remedies adapted to specific needs are employed. These may include, among other things, training opportunities, psychosocial counseling, and adjusting working conditions. The effectiveness of these actions is continuously assessed through employee feedback, internal monitoring, and internal audits.

In addition to platforms such as the annual employee performance review and the follow-up process after the employee survey, other channels set up by voestalpine AG are available for the employees to express their concerns and have them examined:

1. **Whistleblower system** (<https://www.bkms-system.net/voestalpine>)
2. E-mail address of the Group's **Human Rights Officer** ([humanrights@voestalpine.com](mailto:humanrights@voestalpine.com))
3. E-mail address of **the central compliance contact point** ([group-compliance@voestalpine.com](mailto:group-compliance@voestalpine.com))
4. Getting into direct contact with **voestalpine AG's Group Human Resources**

The bodies contacted look into the concerns raised, investigate any complaints, and inform the employees who have contacted them of any decisions or outcomes. Further information on the specific channels, their availability, and awareness of the structures within the workforce can be found in chapter G1-1 in the section on the whistleblower system.

#### **S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions**

Targeted measures are implemented by voestalpine AG across the Group to manage material impacts on the workforce. These address both positive impacts—for example, by promoting diversity and development opportunities—and actual negative impacts—for example in the context of risks to the safety and health of employees. Actions taken are based on strategic concepts, coordinated across divisions, and continuously developed. They aim to create a secure framework, and identify and mitigate risks at an early stage.

In the voestalpine Group, suitable measures to prevent or mitigate negative impacts are generally selected on the basis of systematic risk analyses, internal evaluations, and feedback from relevant stakeholders, such as employees. The specific formulation of actions to be taken is adapted to the respective impact and the operational context. Depending on the subject area, different specialist departments, senior executives, workers' representatives, or specialized committees are involved in the development and evaluation of possible action plans. The aim is to identify effective yet achievable solutions that are tailored to the identified risks. The prioritization of risks may be based on, for example, the magnitude of the actual impact, the affected group of workers, and the urgency of the situation.

The effectiveness of key actions is checked through various processes in the voestalpine Group. These include standardized evaluations, feedback instruments, monitoring data such as training participation, and site-specific audits and surveys (e.g., in the field of health & safety). Specific targets (e.g., proportion of women, accident metrics) are used as indicators. The findings from these review processes are fed into the further development of existing policies and actions.

The necessary funds and personnel resources for these actions are made available by voestalpine AG. Funding is allocated for impacts in the field of health and safety by the health & safety Board, and for HR-related impacts by the HR Board. The Group health & safety and HR departments are responsible for the development and implementation of the actions.

A description of the key spheres of action related to material impacts on voestalpine's own workforce is provided below.

#### **DIVERSITY AND EQUAL OPPORTUNITIES**

Targeted measures are implemented by voestalpine AG throughout the Group to strengthen equal opportunities and actively promote diversity in the long term. A core element of this approach is a comprehensive set of actions, which includes programs to promote women in the company, target group-specific employer branding, and actions to improve work-life balance. The following actions contribute to equal opportunities for all employees—an aspect that was found to be a material positive impact of voestalpine AG.

### » Female empowerment as a strategic sphere of action

An important building block for promoting diversity is the strategic sphere of action “Female Empowerment” included in the HR policy 2030+. The aim is to position voestalpine AG as an attractive employer for women—both among current and potential employees. In light of this, a Group-wide target for increasing the proportion of women has been set. voestalpine has set itself the goal of increasing the proportion of women in management positions from 14% to 18% by 2030. See S1-5 for more information.

Since the business year 2024/25, the Human Resources and Organizational Development competence team has taken over the Group-wide coordination of initiatives and measures for female empowerment. In relation hereto, a sub-competence team containing representatives from all divisions and various professions specifically addresses the topic of female empowerment twice a year. This team discusses action plans—both planned and already implemented—and reflects on Group-wide topics. On the one hand, this supports independent follow-up on the topics in the organizational units; on the other hand, it facilitates Group-wide coordination, for example with regard to resources and strategic orientation.

The following aspects constitute the most important actions in the three defined spheres of action:

#### 1. Positioning

Actions for positioning include target group-specific marketing, positioning, and recruiting, initiatives for early outreach—for example partnerships with schools and sports associations, cooperation with the labor market service to address women in a targeted manner, and target group-specific apprenticeship marketing—childcare facilities offering up to 24/7 care at the Linz site, certifications such as the Austrian “equalitA seal of quality,” and representation at specific events such as the Female Empowerment Festival “Let’s get visible” in Linz.

#### 2. Retaining

The actions to retain female employees include the expansion of flexible working time models, the international rollout of an internal e-learning course on mutual respect, workshops to raise awareness, the use of gender-sensitive language, a dedicated female empowerment section in the Group-wide intranet, and a newsletter that focuses on women at voestalpine AG, the expansion of childcare facilities, and the establishment and expansion of women’s networks.

#### 3. Guiding, supporting, empowering

Actions on this topic include establishing female empowerment as a fixed element of the Austrian education program, ensuring women represent at least 20% of the participants women in the internal management training program value:program, female empowerment as a focus in management training programs, a mentoring program for women who show potential, measures to cushion the career break after maternity leave—including specific part-time models—and an increased focus on female high-potential employees in succession planning.

## TRAINING ON HUMAN RIGHTS

As part of its human rights due diligence obligations, voestalpine provides mandatory e-learning courses for employees and additional training for safety staff. The aim behind this is to raise awareness of human rights issues and identify potential risks at an early stage. Training is carried out by the respective Group companies and is supported by ongoing monitoring of participation rates and training volumes.

It is aimed at all employees with access to e-learning courses and is available in 14 languages. The training program provides information and guidance on human rights compliance and includes three mandatory modules on the following topics:

### MODULE 1: Fundamental of Human Rights

- » Definition
- » Human Rights at voestalpine
- » Code of Conduct
- » Sustainable Development Goals
- » Corporate Responsibility

### MODULE 2: Human Rights in Day-to-Day Work

- » Working Conditions
- » Non-Discrimination
- » Equal Opportunity
- » Right to Freedom of Association
- » Right to Education

### MODULE 3: Human Rights in the Supply Chain

- » Critical Human Rights
- » Success and Risks
- » Alliances
- » SSCM and CR Checklist
- » Consequences

At the end of the 2025/26 business year, 96% (2024/25: 92%) of the assigned human rights training courses were successfully completed.

## PERSONAL DEVELOPMENT AND TRAINING

voestalpine AG undertakes to continuously develop its training and education in order to adapt the skills of its employees to current and future requirements. This is also anchored in the fields of action of the HR Strategy 2030+. The following measures, tailored to various target groups, contribute to the personal development and training of employees—an aspect that has been assessed as a material positive impact of voestalpine AG—as well as to the achievement of the objectives of the HR Strategy 2030+. The programs are group-specific and support employees as they progress through different career and development phases.

In the business year 2025/26, Group-wide expenses for personnel development amounted to more than EUR 74 million (2024/25: EUR 76 million). 85.0% (2024/25: 84.7%) of all employees (excluding apprentices) took part in training and further education measures. The total volume of training was 793,101 hours (2024/25: 839,068 hours), which equates to an average of 20.1 hours per participant (2024/25: 20.8 hours per participant).

#### » voestalpine COACHING

Coaching is an integral part of employee development at the Group. The online platform voestalpine COACHING allows voestalpine employees to individually arrange coaching sessions worldwide. These sessions provide professional support for personal transformations in a professional context.

#### » Management training program—“value:program”

In the business year 2025/26, voestalpine continued to rely on its Group-wide value:program to train current and future managers. The multi-stage program combines training, project work, and international, cross-departmental exchange with the involvement of senior executives and members of the Management Board. For quality assurance purposes, all modules are evaluated after completion. Feedback from the participants, the latest developments, and company-wide values are used to further develop the content as required. In the business year 2025/26, 193 employees from 24 countries took part; of these, 30.1% were women.

### Regional programs

#### » TALENT ROAD CHINA

Talent Road China is a regional development program for high-potential employees and senior executives at voestalpine in China and combines classroom modules with online training. The sixth program was completed in June 2025 with 40 participants; the next one will start in October 2026.

#### » GET CONNECTED PROGRAM North America

The Get Connected Program North America is geared towards young talent and future senior executives in Canada, Mexico, and the USA, and combines classroom training with online modules. In the 2025/26 business year, 26 participants completed the current round; another started in January 2026.

### Specialist programs

#### » HR ACADEMY

The HR academy is a Group-wide training program for voestalpine HR professionals. It is aimed at HR generalists and specialists who want to improve their competencies in HR management in the Group. The program consists of three modules. The sixth academy kicked off in February 2025 with the first module; two more will follow in the business year 2025/26.

#### » purchasing power academy

The purchasing power academy is a group-wide training program for buyers and comprises two levels of competence as well as complementary lifelong learning. Digital learning formats are combined with classroom seminars and certifications and are continuously being enhanced.

## APPRENTICES/TRAINEES

As of the annual reporting date (March 31, 2026), the voestalpine Group was training 1,526 apprentices (2024/25: 1,574 apprentices) in about 50 skilled trades, the majority thereof (66.3%) (2024/25: 68%) at locations in Austria. A total of 15.6% of apprentices were being trained in Germany under the dual system applicable in that country (2024/25: 14%). Because apprenticeships are based on defined requirements, almost all of the apprentices who successfully complete their training are offered an employment contract. voestalpine clearly believes that it has the duty to invest in the training of young, skilled workers. In addition to excellent professional training, attention is also paid to developing personal and social skills. On average, the Group invests EUR 106,000 in training each apprentice (2024/25: EUR 100,000).

The company will offer some 440 trainee slots (2024/25: 500) in the next training year (starting in September 2026) in Austria, Germany, and Switzerland. To give interested young people insights into the vocational training programs on offer at voestalpine, open house days are held at various training locations, designed in a way that targets the specific audience with the involvement of apprentices. One particular aim is to get girls interested in technical professions. The proportion of women in technical apprenticeships has increased by roughly 25% in the past 10 years and currently stands at 13.5% (2024/25: 17.8%). Intensive measures such as participation in careers fairs and visits to schools as well as Girls' Day are undertaken to further increase the proportion of women in technical apprenticeships in particular.

The international success of voestalpine apprentices confirms the quality of their training, such as the silver medal in the electrical systems category at the EuroSkills Professional Championship in Herning, Denmark, in September 2025. voestalpine apprentices have also been successful in Austria: winning awards such as the "Stars of Styria" and the Upper Austrian Apprentice Award places them firmly among the region's top experts.

In addition to their everyday training, apprentices at voestalpine are encouraged and challenged in terms of self-development and personal growth. Examples include team-building seminars, stints of employment abroad, or language trips. The importance of solidarity and social engagement is another focus point, for example, through participation in the 3-Bridges Run in Linz, where an apprentice team consisting of around 170 apprentices and their trainers collected points ("cares") during the voestalpine cares runs, helping those in need. For more information on the voestalpine cares run, see chapter S3-4.

Through a variety of actions taken, voestalpine AG underscores the importance of vocational training and demonstrates how apprenticeship programs can be set up in line with a forward-thinking approach, such as with solutions like the voestalpine BÖHLER CAMPUS, which officially opened in November 2025 and has offered housing for over 30 apprentices for the duration of their training since September 2025. Platforms such as the "Digital Miniature Factory" promote digital skills: In a two-week training project, apprentices develop a functioning miniature production plant and implement real production processes on a small scale.

### » Apprentice advertising campaign #FavoriteMoments

In 2025, voestalpine once again launched its apprenticeship campaign under the umbrella of its brand campaign, which specifically addresses the needs of young people. The campaign showcases the real “favorite moments of apprentices” at voestalpine. It highlights aspects such as team spirit and culture, practice, good compensation, diversity, and quality of education.

The aim of the cross-media campaign is to use the apprentices' #FavoriteMoments to make voestalpine tangible as an employer. Apprentices from voestalpine act as ambassadors and provide authentic insights into their training. In formats such as word raps, apprenticeship presentations, or short videos with reference to the campaign song “All these Moments,” the apprentices provide insights into their everyday lives and many other highlights of an apprenticeship at voestalpine. The campaign employs a wide range of communication channels, such as the Group's own corporate apprenticeship website (<https://www.voestalpine.com/lehre>), social media, print media, and internal channels to reach young people, their parents, and teachers. TikTok and Snapchat are increasingly being used to address the youngest target group.

### » Group Apprentice Day

The Group Apprentice Day is a special experience during the apprenticeship: In the program's final year, all apprentices are invited to the Group's headquarters in Linz to spend an eventful day that includes a talk with Management Board members, a tour of the plant, team challenges, along with a lot of other fun and action. Almost 400 apprentices and trainees from 40 sites in Austria, Germany, and Switzerland took the opportunity to meet in person and get to know the Group headquarters in Linz at the voestalpine Group Apprentice Day on October 21, 2025.

Under the guiding principle of the apprentice advertising campaign #FavoriteMoments, the day was all about unforgettable experiences. At the talk with members of the Management Board, apprentices from different sites shared their personal #FavoriteMoments—from language trips to internships abroad. The program also included a lecture by EU Youth Ambassador Ali Mahlodji, a tour of the plant in Linz, as well as team challenges. The day concluded by awarding the winner of the photo contest with the most beautiful #FavoriteMoments: An image that shows how colleagues have become friends.

### health & safety

In its HR Strategy 2030+, voestalpine undertakes to continuously develop measures to promote employee health and improve occupational safety in order to increase job satisfaction while simultaneously reducing time off due to sickness, accidents, and work-related ill health.

A variety of activities were initiated to support this sphere of action and reflect the importance of this critical success factor.

The voestalpine health & safety calendar 2026, for example, accompanies us throughout the year, focuses on relevant topics on a monthly basis, and promotes discussion on the subject of occupational safety. Insights from safety flashes complement this dialog by analyzing serious incidents across sites and making learning opportunities visible.

voestalpine wants to convey to all employees the importance of identifying risks at an early stage and consistently avoiding risks. The “red lines” set clear boundaries for activities with potentially life-threatening consequences, and are taught as part of a multilingual e-learning course. In addition, the initiative #safetystartswithme in the Metal Forming Division reflects our practice of personal responsibility, intervening when necessary, and the mindset that safety begins with each and every individual.

Uddeholm, one of the High Performance Metals sites, also consistently pursues the goal of zero accidents. More than 6,000 risk assessments, regular safety rounds, and a strong reporting system support the early identification of risks. Training, open communication, and the continuous development of the safety culture are essential building blocks in this regard.

In 2026, the Metal Engineering Division is launching the campaign “Decide now, avoid accidents” to raise employee awareness of near misses so that they can react correctly and avoid risks before they result in serious accidents.

Responsibility for implementation and monitoring the campaign lies with the health & safety Department and with the local safety managers in coordination with local executive management. The engagement and participation of workers’ representatives and the health and safety committee ensure practical and effective action that is geared toward specific operational requirements is pursued. The company ensures the necessary financial and human resources are provided in an appropriate form.

In recent years, the number of occupational accidents across the Group has been significantly reduced. This is also reflected in the Group-wide target “reduce the frequency of accidents.” For more information, see chapter S1-5. This decline is the result of consistent and structured health and safety actions that have been effectively rolled out in the divisions.

In addition, occupational accidents are systematically analyzed to identify their causes and contributing factors. Based on this, we derive targeted prevention measures and consistently implement them. Where relevant, findings from accidents are communicated across sites in order to avoid similar incidents in the long term.

The companies have a wide range of support tools at their disposal. The specific selection and implementation of actions is carried out for each site by the respective divisional companies in close coordination with the responsible safety managers.

#### » health & safety training

voestalpine AG companies regularly hold safety meetings with all of their employees. Monthly discussions between master craftspeople and staff, as well as the 15-minute safety training by safety staff and safety representatives, provide key formats for communicating occupational safety measures. Workers’ representatives are also actively involved in this process in order to jointly develop actions to improve safety.

Additionally, quarterly safety inspections are conducted by executive management, with one inspection each year being carried out with the involvement of Management Board members. All employees are required to complete an online training course on health and safety that conveys the safety values and standards of voestalpine AG and supplements the classroom-based training. Targeted training courses for management and master craftspeople are also held. Mandatory participation in safety training courses is documented and tracked.

## OVERVIEW OF ACTIONS

IROs addressed	Action	Time horizon	Scope of the action	Significant expenditure (if relevant)/ other comments
Equal opportunities for all employees	"Diversity and equal opportunities" set of actions	Implementation of the set of actions by the end of 2026 at the latest	Own operations Employees	Some actions already implemented
Attractive working conditions	Training on human rights	Current actions	Own operations  All employees  External security personnel (upstream)	-
Personal development and training	"Personal development and training" set of actions	Current actions	Own operations  All employees  Apprentices in the DACH region	Yes, OpEx  (>EUR 74 million total annual cost for employee development)  Identification of training needs during employee performance review
Healthy and safe working conditions at voestalpine  Accidents at work, injuries, and occupational illnesses	"health & safety" set of actions	Dependent on actions taken	Own operations  Own workforce (employees and non-employees)	Consideration of the interests of safety managers and workers' representatives  Remedial action taken as required

## METRICS AND TARGETS

### S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

#### **TARGET: TO INCREASE THE PROPORTION OF WOMEN**

As part of the HR Strategy 2030+ strategic sphere of action “Female empowerment,” voestalpine aims to position itself as an attractive employer for women—both for current and potential employees. Female empowerment contributes to diversity in decision-making positions, increasing employee engagement, and promoting a positive corporate culture. The aim is to measure and strengthen the positive impacts identified for “equal opportunity for all employees.”

A gender-balanced approach at the company counteracts social inequalities and strengthens the right to fair participation in working life—a fundamental principle of sustainable development. By aiming to increase the proportion of women—especially in leadership positions—voestalpine AG is strengthening human rights principles.

Equal opportunity in the world of work is one of the internationally recognized human rights, in particular the ILO core labor standards. voestalpine AG also supports the UN sustainability goal SDG 5. In particular, the focus is on sub-objective 5.5, which entails “ensuring that women are equally involved at all levels of decision-making.” This SDG objective is also anchored in the European Union’s strategic frameworks—including the EU Green Deal and the EU Sustainable Finance Agenda. voestalpine contributes to the implementation of these European objectives and to the EU Gender Equality Strategy, which aims to achieve a gender-equitable Europe.

A higher proportion of women further strengthens the competitiveness and sustainability of the company. Diverse teams have been found to be more resilient, innovative, and decisive, which represent key advantages for the management of complex industrial structures. Targeted support for women in underrepresented areas also unlocks previously untapped talent potential and helps to overcome the shortage of skilled workers.

At the same time, a visible commitment to equal opportunity increases employer attractiveness—especially among younger generations—and fosters a cultural shift toward an inclusive, modern corporate culture.

In concrete terms, the undertaking strives to increase the proportion of women at all qualification levels throughout the Group. In particular, the proportion of female senior executives is to be increased from 14% (business year 2023/24) to 18% by 2030. Senior executives are defined as employees with disciplinary personnel responsibility, with the exclusion of board members. This target is based on an evaluation of the previous development and the current gender distribution in the Group.

## TARGET: TO INCREASE THE PROPORTION OF WOMEN IN LEADERSHIP POSITIONS

<b>KPI</b>	Percentage of women in leadership	
<b>UNIT</b>	in percent	
<b>BASE VALUE</b>	<b>STATUS</b>	<b>TARGET VALUE</b>
14% Business year 2023/24	15.5% Business year 2025/26	18% Business year 2029/30
<b>Responsibility and monitoring</b>	HR Board	
<b>Scope</b>	All female senior executives (employees with disciplinary personnel responsibility, with the exclusion of members of the Management Board)	
<b>Stakeholders</b>	Employees and employee representatives	
<b>IROs addressed</b>	Equal opportunities for all employees	
<b>Reference to policy</b>	HR Strategy 2030+	

HR objectives in relation to the topic of female empowerment are defined as part of a participatory process with the engagement of employee representatives. This includes regular employee surveys, stakeholder communication, topic-specific working groups and regular committees with the division HR managers. The aim is to take different points of view into account and to ensure the relevance and feasibility of the objectives.

Implementation and target achievement are monitored through periodic reviews and evaluations based on quantitative and qualitative indicators. In addition, feedback tools such as employee surveys and joint review sessions with the workforce are used to gain additional knowledge and derive measures as necessary. This approach strengthens the Group's commitment to diversity and inclusion, and promotes an open and collaborative corporate culture.

The goal to increase the proportion of women in management positions is anchored in voestalpine's corporate governance. It is monitored and evaluated as part of the ongoing management processes and, where necessary, further enhanced by actions and initiatives.

As of March 31, 2026, the total proportion of women in the voestalpine Group was 16.6% (2024/25: 16.4%). The percentage of female workers among waged employees was 7.3% (2024/25: 7.3%); among salaried employees it was 30.1% (2024/25: 29.9%). The proportion of female senior executives was 15.5% (2024/25: 14.4%). In all categories, there was a slight increase compared with the previous year.

## TARGET: REDUCE THE FREQUENCY OF ACCIDENTS

This target has been set on the basis of the international standard ISO 45001, as well as national and European targets for occupational health and safety. In particular, voestalpine AG takes into account the objectives of the EU Strategic Framework on Health and Safety at Work 2021–2027, which, among other aspects, pursues the guiding principle of "Vision Zero"—i.e., zero fatalities due to occupational accidents. The objective is to systematically reduce work-related health risks and to adjust the level of safety in line with internationally recognized standards throughout the Group. The health & safety Committee, consisting of the respective representatives of the divisions and workers' representatives, sets the Group's targets, which are ultimately approved by health & safety Board.

Implementation and target achievement are ensured by periodic reviews and evaluations as part of the quarterly health & safety Committee meetings or the semi-annual health & safety Board meetings.

The Lost Time Injury Frequency Rate (LTIFR) indicates the frequency of accidents based on the number of recordable workplace accidents entailing more than three sick days per one million hours worked. To ensure uniform comparability, the definitions of recordable accidents, days lost, and hours worked have been standardized across the Group—especially in light of the differing national regulations.

Reducing the frequency of accidents contributes significantly to sustainable development, as safe working conditions represent a key element of decent working (SDG 8 “Decent Working and Economic Growth”) and ensure the long-term viability and health of employees.

For employees, this means a lower risk of injury and an overall safer and healthier working environment. For the company, the systematic prevention of occupational accidents increases operational stability, reduces downtime, and enhances employer attractiveness—especially in safety-critical work areas.

In relation to health and safety, voestalpine aims to reduce the accident rate to the target value of 5.5 by the end of the business year 2029/30.

The Group health & safety Department reviews this target within the scope of Group-wide reporting and control processes.

## TARGET: REDUCE THE FREQUENCY OF ACCIDENTS

<b>KPI</b>	LTIFR (lost time injury frequency rate)	
<b>UNIT</b>	Recordable accidents per million hours worked	
<b>BASE VALUE</b>	<b>STATUS</b>	<b>TARGET VALUE</b>
16.1 Business year 2015/16	6.1 Business year 2025/26	5.5 Business year 2029/30
<b>Responsibility and monitoring</b>	health & safety Committee and health & safety Board	
<b>Scope</b>	Own operations, own workforce (employees and non-employees)	
<b>Stakeholders</b>	Own workforce	
<b>IROs addressed</b>	<ul style="list-style-type: none"> <li>» Accidents at work, injuries, and occupational illnesses</li> <li>» Healthy and safe working conditions at voestalpine</li> </ul>	
<b>Reference to policy</b>	<ul style="list-style-type: none"> <li>» Group health &amp; safety Policy and the Safety Code</li> <li>» Occupational safety management systems</li> </ul>	

In the context of the IROs “attractive working conditions” and “personal development and training”, there are no Group-wide, time-limited and specific outcome-oriented targets in place related to voestalpine’s own workforce. This is due to the fact that the structure and management in these areas is predominantly decentralized and corresponding targets are also set at this level.

## S1-6 – Characteristics of the undertaking's employees

The following information is presented based on head count. The number of persons represents the total of waged and salaried employees, with both fixed-term and permanent contracts, including the number of apprentices. Together, these employee groups form the number of employees. No employees with zero hours contract are employed by the Group.

Unless otherwise stated, the following metrics refer to the reporting date of March 31, 2026.

As of the reporting date (March 31, 2026), the voestalpine Group had a global workforce of 48,010 employees (including apprentices). Of these, 1,526 apprentices were receiving training at the voestalpine Group as of March 31, 2026, a slight decrease of 3.0%, or 48 apprentices over the previous year (2024/25: 1,574). 6,524 or 13.6% of employees had a fixed-term contract (2024/25: 6,854). Overall, the number of employees fell by 1,288 or 2.6% compared with the previous year.

In the Annual Report, the information according to S1-6 is presented in Note D.28. Information on employees in the notes to the Consolidated Financial Statements.

### EMPLOYEES BY GENDER

As of the March 31 reporting date	2024/25	2025/26
<b>Gender</b>		
Male	41,114	40,006
Female	8,184	8,000
Other	0	0
Not specified <sup>1</sup>	-	4
<b>Total Employees</b>	<b>49,298</b>	<b>48,010</b>

<sup>1</sup> The "Not specified" category was first compiled in the business year 2025/26.

### EMPLOYEES BY COUNTRY

Number of persons in countries with companies with >50 employees and >10% of the Group workforce, as of the March 31 reporting date	Austria		Germany	
	2024/25	2025/26	2024/25	2025/26
<b>Gender</b>				
Male	20,520	20,264	5,297	4,925
Female	3,803	3,775	1,109	1,014
Other	0	0	0	0
Not specified <sup>1</sup>	-	0	-	0
<b>Total Employees</b>	<b>24,323</b>	<b>24,039</b>	<b>6,406</b>	<b>5,939</b>

<sup>1</sup> The "Not specified" category was first compiled in the business year 2025/26.

## EMPLOYEES BY TYPE OF CONTRACT AND GENDER

As of the March 31 reporting date	Female	Male	Other	Not specified <sup>1</sup>	Overall
<b>2024/25</b>					
Employees	8,184	41,114	0	-	49,298
Number of permanent employees	6,926	35,518	0	-	42,444
Number of temporary employees	1,258	5,596	0	-	6,854
Number of non-guaranteed hours employees	0	0	0	-	0
<b>2025/26</b>					
Employees	8,000	40,006	0	4	48,010
Number of permanent employees	6,816	34,666	0	4	41,486
Number of temporary employees	1,184	5,340	0	0	6,524
Number of non-guaranteed hours employees	0	0	0	0	0

<sup>1</sup> The "Not specified" category was first compiled in the business year 2025/26.

Numerous measures in the voestalpine Group aim to make the best possible use of the knowledge and experience of the employees and to increase their job satisfaction. This also helps to keep the fluctuation rate as low as possible. Based on the total number of employees employed as of the reporting date (excluding apprentices), which amounted to 46,484, the turnover rate for employment contracts terminated by mutual consent or by employees was 7.5% in the business year 2025/26 (2024/25: 7.8%). A total of 5,622 employees (excluding apprentices) left the company (e.g., due to resignation, unrenewed expiring fixed-term contracts, retirement, death), which is 45 more employees year over year (2024/25: 5,577). This corresponds to an overall turnover rate of 12.1%, which is 0.4 percentage points higher than in the previous year (2024/25: 11.7%) (see Note D.28. Employee information in the notes to the Consolidated Financial Statements).

### S1-8 – Collective bargaining coverage and social dialogue

voestalpine AG is committed to freedom of association and right of its employees to organize themselves in a union. Trade unions represent the interests of employees and negotiate with the employer to achieve fair working conditions, in particular in the form of wages, salaries, working hours, and leave entitlements, which are set down in writing in collective agreements. They may vary from country to country. As of the reporting date for 2025/26, 36,959 employees (including apprentices) in the voestalpine Group, i.e., 77.0%, were covered by a collective agreement (2024/25: 38,378 employees, or 77.8%). For companies in the EEA area, the coverage rate was 87.7% and 32,753 (2024/25: 33,839 and 88.7%) for a total of 37,350 employees (including apprentices). At 96.9% coverage in Austria (2024/25: 98.8%) and 64.9% in Germany (2024/25: 65.4%), a significant number of employees in the Group are covered by collective agreements.

In many voestalpine Group companies, a works council represents employee interests alongside collective agreements. Austria and Germany are particularly significant in this regard, with 29,978 (62.4%) of the Group's 48,010 employees around the globe coming from these two countries. Of these, as in the previous year, 98.6% of employees in Austria and 88.1% in Germany are represented by a works council.

## COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

As of the March 31 reporting date, no changes from the previous year

	Collective bargaining coverage for employees		Social dialogue
	Employees—EEA <sup>1</sup>	Employees—Non-EEA <sup>2</sup>	Workplace Representation (EEA only) <sup>3</sup>
<b>2025/26</b>			
<b>Coverage Rate</b>			
0–59%			
60–79%		Germany	
80–100%		Austria	Germany, Austria

<sup>1</sup> For EEA countries with > 50 employees representing > 10% total employees.

<sup>2</sup> Non-EEA (estimate for regions with > 50 employees representing > 10% total employees).

<sup>3</sup> Workplace representation (EEA only) for countries with > 50 employees representing > 10% total employees.

### S1-9 – Diversity metrics

#### TOP MANAGEMENT

The top management of the voestalpine Group (headquartered in Linz) comprises the Management Board of voestalpine AG and executive management of the divisional subsidiaries. At the end of the reporting year, the proportion of women in top management was 11.1%.

#### GENDER DISTRIBUTION AT THE TOP MANAGEMENT LEVEL

	Number 2025/26	Percentage 2025/26
<b>Top management</b>		
Male	16	88.9%
Female	2	11.1%
Other	0	0.0%
Not specified <sup>1</sup>	0	0.0%
<b>Overall</b>	<b>18</b>	<b>100.0%</b>

<sup>1</sup> The “Not specified” category was first compiled in the business year 2025/26.

#### AGE STRUCTURE IN THE GROUP

A balanced age structure helps ensure the transfer of knowledge, make age-related departures predictable, and avoid staff shortages. It makes it easier to replace employees entering retirement in a timely manner. To achieve this, employees need to feel loyal to voestalpine and be retained in the long term. As of March 31, 2026, the average age of employees in the voestalpine Group—excluding apprentices—was 42.2 years old (2024/25: 41.7 years old).

The following table shows the age distribution of the workforce (excluding apprentices):

#### AGE STRUCTURE OF EMPLOYEES (EXCLUDING APPRENTICES)

	Number		Percentage	
	2024/25	2025/26	2024/25	2025/26
Under 30 years old	8,795	8,204	18.4%	17.6%
30 to 50 years old	26,517	25,981	55.6%	55.9%
Over 50 years old	12,412	12,299	26.0%	26.5%

#### S1-10 – Adequate wages

voestalpine upholds minimum social standards throughout the Group with its Code of Conduct. Chapter 5, Social Responsibility, states the following obligation under the heading “Compensation”: *“employees must be compensated in accordance with applicable legal regulations and collective agreements, and this compensation must be sufficient to meet the basic needs of both employees and their families and to provide them with a decent standard of living.”*

This requirement must be implemented in every Group company. The respective executive management verifies compliance with the code every two years with their signatures. As of the business year 2025/26, companies will be required to undergo spot checks to review compliance.

The spot check was undertaken at 32 voestalpine companies which had stated that their employees were not covered by a collective agreement. The answers were collected in the form of an electronic questionnaire. The questions related to compliance with minimum legal standards or, in the absence of legal regulations, to other national or international benchmarks. If there was no regulated benchmark, companies were required to apply the minimum wage per hour according to the Wage Indicator as a benchmark.

In all countries of the companies audited, remuneration is regulated by law. The audit found that no employees of the companies concerned are remunerated below the legally established minimum standard.

#### S1-14 – health & safety metrics

The following quantitative information on occupational health and safety relates exclusively to employees of the voestalpine Group. In accordance with the ESRS transitional provisions, information on non-employee workers is not yet reported.

In the business year 2025/26, 507 (2024/25: 597) recordable workplace accidents were recorded in the voestalpine Group. The Lost Time Injury Frequency Rate (LTIFR), which is calculated uniformly across the Group, indicates the number of recordable workplace accidents entailing more than three sick days per one million hours of work performed. This amounted to 6.1 in the reporting year (2024/25: 7.0). Unfortunately, there was also one fatal accident involving a voestalpine employee (2024/25: two).

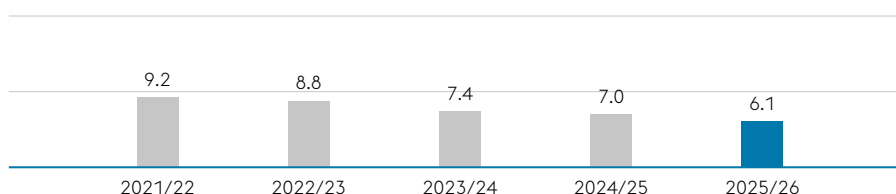
Near misses are also systematically recorded as part of a Group-wide health & safety web tool. Actions to improve the situation are defined on the basis of the review of incident reports and documented if necessary.

Thanks to consistent health and safety measures across all divisions, the number of workplace accidents has been significantly reduced in recent years. Ongoing classroom training at all sites contributed to the further reduction in the frequency of accidents in the business year 2025/26.

The LTIFR metric is documented on a Group-wide basis and evaluated using an internal system.

## DEVELOPMENT OF THE LOST TIME INJURY FREQUENCY RATE (LTIFR)

As of the March 31 reporting date



### S1-16 – Remuneration metrics (pay gap and total remuneration)

In order to determine the income gap between men and women in the Group, the gender pay gap was calculated on the basis of annual total remuneration (fixed and variable components as well as benefits in kind), target hours, and overtime paid. Target hours may take into account the available capacity of part-time workers. To ensure valid comparability, the members of the Management Board were not included in the calculation as they are not considered employees.

Apprentices are not included in the calculation either. Apprentice wages are a training allowance that is based on the progress made in the apprenticeship and not on actual work performance or market value. At voestalpine, the amount of an apprentice's wage depends exclusively on the applicable collective agreements and is not freely agreed between apprentices and the company. Neither the gender nor the working hours of apprentices have any influence on the pay structure. The data reported by the companies was first recorded in the domestic currency at the individual level and then converted to euros for the purpose of comparability. In the voestalpine Group, the gender pay gap (excluding the Management Board) came to 15.2%; a slight rise of 1.7 percentage points over the previous year<sup>1</sup> (13.5%). The disparity can be explained partly by the different fields of activity (service sector, production companies, etc.), a slight reduction in predominantly male production roles, and severance payments for male retirees from the baby boom generation.

<sup>1</sup> Prior-year figure retroactively adjusted from 19.8% to 13.5% (see BP-2 for details).

The ratio of the median annual total remuneration of all employees (excluding the Management Board) compared to the highest earner came to 1:63.9 in the business year 2025/26 (2024/25: 1:64.2).

In addition to the fixed gross salary, variable salary components, and the values of benefits in kind (company car; company apartment, voluntary insurance) are also included in the total remuneration. The Group median was calculated using a statistical approximation method, as system limitations mean that only aggregated remuneration data are available for foreign subsidiaries, whereas complete individual data are available for Austria. The approximation is based on country-specific weighting factors taking into account comparable salary levels. A subsequent plausibility check confirmed only minor, economically insignificant variances.

### **S1-17 – Incidents, complaints, and severe human rights impacts**

Compliance and human rights violations can be reported using various internal and central reporting points such as the whistleblower system. Whistleblowers can choose whether or not to state their name. For more detailed information on the channels through which concerns can be expressed, see chapters S1-3 and G1-1.

In the business year 2025/26, 50 reports were received through the established reporting channels (2024/25: 24). Of these, 34 cases were reported through the whistleblower system and 16 by e-mail. Each case was assessed and dealt with. The outcome of two cases is still pending. Of the 48 categorized cases, 13 (2024/25: 7) can be classified as discrimination in the form of harassment, micromanagement, and non-inclusion. 10 reports concern lack of appreciation and three cases concern violations of labor law. Four cases concern possible private sector misconduct by employees and 18 cases concern general complaints. Two years ago, legal proceedings were initiated in one case of dismissal and are still pending. None of the 50 reports received involved any form of human rights violations. In the business year 2025/26, as in the previous year, no fines or compensation payments were made on the basis of human rights violations.

## OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the assumptions and methodology	Information on sources of a high level of measurement uncertainty and information on measurement
S1-6 – Characteristics of the undertaking's employees	50a	Employees by gender	Number of own staff (headcount) by gender, including apprentices and non-guaranteed hours employees, excluding interns (during summer breaks or as part of school programs), freelance contractors, diploma students/ PhD students	Limited—data represents the individual companies
S1-6 – Characteristics of the undertaking's employees	50a	Employees by country	Number of own staff (headcount) by country, including apprentices and non-guaranteed hours employees, excluding interns (during summer breaks or as part of school programs), freelance contractors, diploma students/PhD students. Only Germany and Austria included	Limited—data represents the individual companies
S1-6 – Characteristics of the undertaking's employees	50b	Employees by type of contract and gender	Distinction between permanent contracts, fixed-term contracts, and non-guaranteed hours employees (e.g., casual workers, zero hours contracts)	Limited—data represents the individual companies
S1-6 – Characteristics of the undertaking's employees	50c	The total number of employees who have left the undertaking and the rate of employee turnover	Total number of own staff (excluding apprentices) who left the company voluntarily (termination by employee), by mutual agreement, as a result of termination by the employer, retirement, due to occupational disability, or death (excluding transfers to another voestalpine company). Average annual values as of March 31 of the previous year + March 31 of the current business year	Limited—data represents the individual companies
S1-8 – Collective bargaining coverage and social dialogue	60a	Collective bargaining coverage for employees	Collective agreement coverage in percent = number of employees covered by a collective agreement (headcount)/total number of employees (headcount). Collective agreements are defined as "any written agreement on terms and conditions of employment concluded between an employer, a group of employers, or one or more employer organizations on the one hand, and one or more representative employee organizations (trade unions) on the other hand"	Limited—data represents the individual companies
S1-8 – Collective bargaining coverage and social dialogue	60b	Collective bargaining coverage on a country-by-country basis (EEA countries)	The disclosure requirements on collective agreements in the European Economic Area concern only the voestalpine companies in Austria and Germany, since only in these countries are the thresholds according to ESRS S1-8 (at least 50 employees and at the same time at least 10% of the total workforce) achieved	Limited—data represents the individual companies
S1-8 – Collective bargaining coverage and social dialogue	63a	Coverage by worker's representatives on a country-by-country basis	Workers' representatives refer to i. Trade union representatives, designated, or elected by trade unions or by members of such unions in accordance with national legislation and practice  ii. Duly elected representatives, namely representatives who are freely elected by the workers of the organization, not under the domination or control of the employer in accordance with provisions of national laws or regulations, or of collective agreements, and whose functions do not include activities which are exclusively reserved by the trade unions in the country concerned and the existence of which is not used to undermine the position of the trade unions concerned or their representatives	Limited—data represents the individual companies

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the assumptions and methodology	Information on sources of a high level of measurement uncertainty and information on measurement
S1-9 – Diversity metrics	66a	Gender distribution at the top management level	The top management level is defined as the Management Board of voestalpine AG and the executive management of the divisions' lead companies	Limited—data represents the individual companies
S1-9 – Diversity metrics	66b	Age structure of employees	Total own workforce as of March 31 (excluding apprentices), divided into age groups: 1) <30 years old, 2) 30–50 years old, and 3) >50 years old	Limited—data represents the individual companies
ESRS S1-10 – Adequate wages	70	If not all its employees are paid an adequate wage in line with applicable benchmarks, the undertaking must disclose the countries where employees earn below the applicable adequate wage benchmark and the percentage of employees that earn below the applicable adequate wage benchmark for each of these countries	In accordance with the Code of Conduct of voestalpine, chapter 5 “Social Responsibility” states the following obligation under the heading “Compensation”: employees must be compensated in accordance with applicable legal regulations and collective agreements, and this compensation must be sufficient to meet the basic needs of both employees and their families and to provide them with a decent standard of living. Compliance with the Code of Conduct is mandatory for all companies in which voestalpine AG directly or indirectly holds at least 50% of the share capital or over which it exerts control in another manner	-
S1-14 – Health and safety metrics	88a	Percentage of workers covered by the health and safety management system	Total employees of certified companies/ Total employees of material companies * 100	Limited—mapping of the data in the companies via Safety Webtool
S1-14 – Health and safety metrics	88b	Number of deaths due to work-related injuries and illnesses	Total fatalities » after fatal accidents at work and » after work-related ill-health (only from 2nd reporting year onward, due to transitional provision)	Limited—data represents the individual companies
S1-14 – Health and safety metrics	88c	The number and rate of recordable work-related accidents	Is calculated based on LTIFR (lost time injury frequency rate: indicates the frequency of accidents based on the number of reportable workplace accidents entailing more than three sick days per million hours worked. The scope of the report covers all companies with personnel	Limited—data represents the individual companies
S1-16 – Remuneration metrics	97a	Gender pay gap, defined as the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees	This metric is calculated on the basis of the gross earnings (fixed + variable) paid during the business year and any benefits in kind, per male and female employee. Fixed remuneration is defined by basic salary, allowances, premiums, paid overtime, fringe benefits, special payments, and pension benefits. Variable remuneration is defined by success premium, target premium, and other premiums. Benefits in kind include company cars, company housing, and voluntary insurance	Limited—data represents the individual companies

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the assumptions and methodology	Information on sources of a high level of measurement uncertainty and information on measurement
S1-16 – Remuneration metrics	97b	Ratio of the annual total remuneration of the highest paid individual to the median annual total remuneration for all employees	This metric is calculated on the basis of the gross earnings (fixed + variable) paid during the business year and any benefits in kind, per male and female employee. Fixed remuneration is defined by basic salary, allowances, premiums, paid overtime, fringe benefits, special payments, and pension benefits. Variable remuneration is defined by success premium, target premium, and other premiums. Benefits in kind include company cars, company housing, and voluntary insurance	Limited
S1-17 – Incidents, complaints, and severe human rights impacts	103a	The total number of reported incidents of discrimination, including harassment, in the reporting period	Number of incidents reported through the Group channels (whistleblower system, e-mail address for the Group Human Rights Officer (Group Sustainability), and by e-mail to the Group compliance contact point (Legal, Investments, and Compliance), or Group HR management	Whistleblower system, other reporting channels in accordance with Code of Conduct
S1-17 – Incidents, complaints, and severe human rights impacts	103b	Number of complaints received through channels from own workforce (including grievance mechanisms)	Number of incidents reported to the Group Compliance Officer, Head of Group Sustainability, or the Head of Group Human Resources outside of established Group channels	Other reporting channels according to Code of Conduct or direct report to managers
S1-17 – Incidents, complaints, and severe human rights impacts	103c	The total amount of significant fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed above	Litigation Report containing a list of human rights violations and discrimination including, sexual harassment, subject to court or authority proceedings as of March 31, 2026	Limited
S1-17 – Incidents, complaints, and severe human rights impacts	104a	Number of severe human rights incidents in connection with workers	Number of severe human rights incidents in connection with workers reported using reporting channels set up by the Group in accordance with point 7 of the voestalpine Code of Conduct	Insufficient forwarding of reports: When someone who receives a report fails to forward it to the responsible Group entity, the case is not recorded across the Group
S1-17 – Incidents, complaints, and severe human rights impacts	104b	Total amount of fines, penalties and compensation for damages in relation to severe human rights incidents connected to the undertaking's workforce and reconciliation of the monetary amounts disclosed in the most relevant amount in the financial statements	Total fines and compensation for damages in relation to severe human rights incidents involving voestalpine's own workforce based on the list of human rights violations and discrimination including sexual harassment, subject to court or authority proceedings included in the Litigation Report as of March 31, 2026	-

## ESRS S2 WORKERS IN THE VALUE CHAIN

voestalpine sources a wide range of materials, products, and services from a large number of suppliers around the globe. It supplies its products—mostly semi-finished products—to companies from various sectors and countries. The analysis of indirect impacts and management of risks along the value chain remains primarily focused on the upstream sector, specifically on the supply chain.

The purchasing principles are based on the Group Strategy 2030+ and the sustainability strategy. voestalpine aims to minimize (potential) negative impacts in the value chain and associated risks for the company.

As part of its supply chain management, voestalpine documents impacts related to labor and human rights, along with other impacts, associated with the activities of suppliers. The company adopts a risk-based approach that takes into account sector-specific and country-specific risks. The focus is on suppliers that produce raw materials and input materials such as ores, alloys and other metals. As part of preparations for the Corporate Sustainability Due Diligence Directive (CSDDD) requirements, the current due diligence process is to be continuously expanded, and a Group-wide due diligence management system is to be implemented. This includes the development of roles, competencies and responsibilities.

Violations of labor or human rights, such as child or forced labor, can lead to inappropriate or abusive working conditions. Violations may result in penalties, loss of reputation, and the consequent loss of customers. This risk has been classified as material as part of the double materiality assessment (see ESRS 2, IRO-1 disclosure). For an overview of all material IROs, see SBM-3 in chapter ESRS 2. The following table provides specific information on SBM-3:

Topic/sub-topic/sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Worker rights and conditions in the value chain	○ Inappropriate or abusive working conditions in the value chain	voestalpine's value chain may include workers who are exposed to poor or abusive working conditions and discriminatory practices, such as low pay, long working hours, unsafe or unhealthy environments, and forced or child labor.	>>>	●●●●	Workers in the value chain, local communities Suppliers Legislators Local, national, and international authorities

### Key

● Actual positive impact   ● Actual negative impact   ○ Potential positive impact   ○ Potential negative impact   + Opportunity   † Risk  
 >>> Upstream   >>> Own operations   >>> Downstream   ●○○○ < 1 year   ○●○○ 1-5 years   ○○○○ 5-10 years   ○○○● 10+ years

## IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

### S2-1 – Policies related to value chain workers

As an undertaking, voestalpine is committed to respecting human and labor rights throughout its value chain. This obligation applies not only to its own companies but also to its business partners. Requirements for voestalpine companies and business partners are laid down in the Code of Conduct for Business Partners (CoC-BP), which together with the Due Diligence User Manual (see G1-2), the Human Rights Policy (see S1-1), the Group Procurement Policy, the General Terms and Conditions of Purchase (GOP), and the Sustainable Supply Chain Roadmap forms the basis for responsible cooperation and the fulfillment of due diligence in the value chain.

These voestalpine policies for reducing (potential) negative impacts in the supply chain take into account both legal requirements and international frameworks such as the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, the International Bill of Human Rights, and the UN Convention against Corruption.

The table below lists the main internationally recognized frameworks for the implementation of human rights and environmental due diligence frameworks with which the specified policies are consistent.

### OVERVIEW OF INTERNATIONALLY RECOGNIZED HUMAN RIGHTS DUE DILIGENCE FRAMEWORKS

Organization	Guideline	Details
United Nations (UN)	UN Guiding Principles on Business and Human Rights (UNGPs)	<ul style="list-style-type: none"> <li>» Basic framework for corporate responsibility and human rights</li> <li>» Guidelines for undertakings, governments, and civil society in their efforts to prevent and manage the risk of negative impacts on human rights</li> </ul>
International Labor Organization (ILO)	Declaration on Fundamental Principles and Rights at Work	<ul style="list-style-type: none"> <li>» Competent body for the establishment and respect of international labor standards and the promotion of fundamental rights at work</li> </ul>
Organization for Economic Cooperation and Development (OECD)	OECD Due Diligence Guidance for Responsible Business Conduct	<ul style="list-style-type: none"> <li>» Provides practical guidance on key topics such as climate change, biodiversity, technology, business integrity, and supply chain due diligence</li> <li>» Refers to other international standards and to international commitments and regulations (e.g., the 2030 Agenda for Sustainable Development and the Paris Agreement)</li> <li>» Represents a common understanding between governments and stakeholders of the due diligence framework for responsible business conduct</li> </ul>

## **CODE OF CONDUCT FOR BUSINESS PARTNERS AND GENERAL CONDITIONS OF PURCHASE (GOP)**

The Code of Conduct for Business Partners (CoC-BP) and the voestalpine General Conditions of Purchase (GOP), which apply to all suppliers, set out a number of criteria for promoting sustainable sourcing and, in particular, ensuring human rights are respected. Any deviation from or failure to comply with internationally recognized frameworks, such as the UN Guiding Principles on Business and Human Rights or the ILO Declaration on Fundamental Principles and Rights at Work, can be reported using the established grievance process.

Due to increased legal requirements and the associated reporting obligations, voestalpine standardized its approach to the obligation to prove compliance with human rights and environmental standards for all purchasing activities in 2024 and set forth corresponding requirements in its Procurement Policy. Monitoring compliance with the above-mentioned international frameworks therefore also takes place on the basis of the Group's Procurement Policy.

The current version of the CoC-BP was adopted by the Management Board of voestalpine at the end of the business year 2022/23. This Code defines voestalpine's principles and requirements, and is designed to ensure that the practices of business partners conform to both voestalpine's values as well as the pertinent laws and regulations.

- » Compliance with laws
- » Social responsibility
- » Environment and climate change mitigation
- » Supply chain management
- » Reporting of misconduct
- » Cooperation and participation

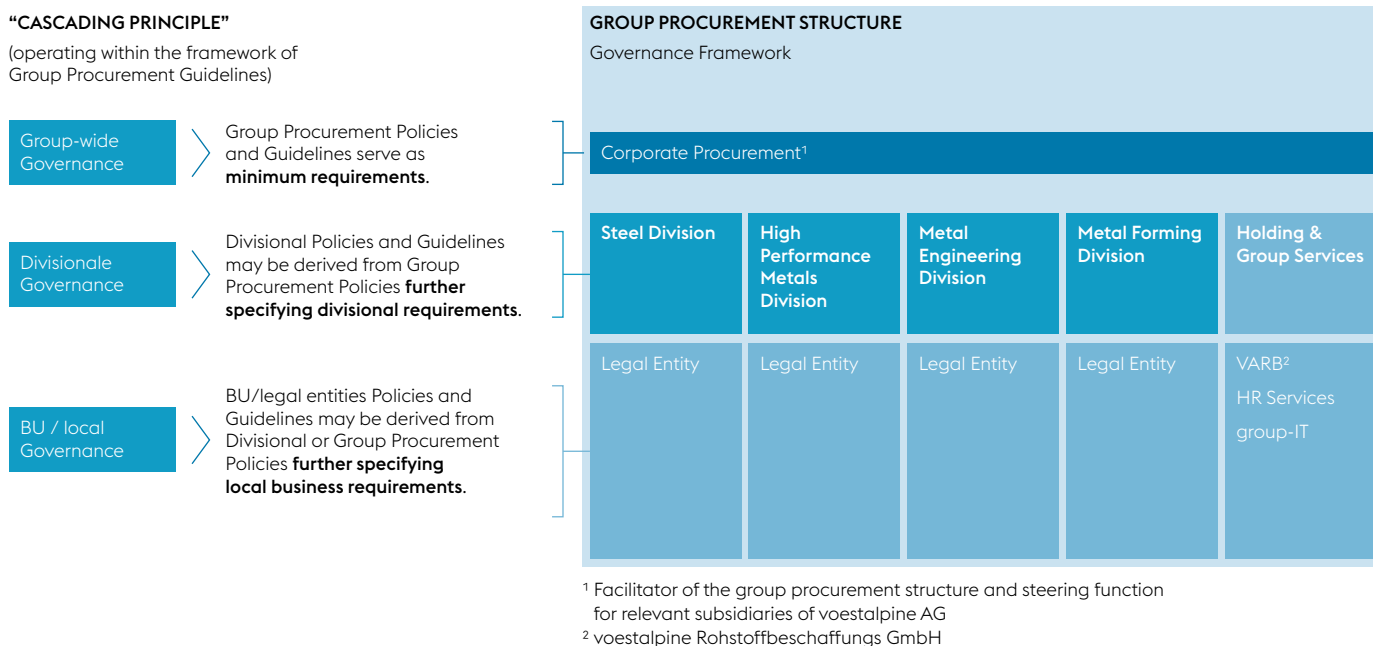
Business partners are required to inform their employees and direct suppliers that they can also report wrongdoing and violations of CoC-BP requirements using the voestalpine whistleblower system.

## **PROCUREMENT POLICY**

Supply chain due diligence obligations and the associated actions to prevent negative impacts on workers are to be implemented within the existing procurement structures. Human and organizational resources are continuously available to assist with this process. Resources earmarked specifically for this undertaking are not currently reported separately.

A clearly defined governance framework has been established for corporate procurement (see figure below), which regulates the dissemination principles and responsibility for implementation within the organization.

## GOVERNANCE FRAMEWORK FOR THE GROUP PROCUREMENT STRUCTURE



Procurement governance follows a cascade principle: the Group defines binding minimum standards and specifications at the overarching level. Subordinate organizational units must operate within this framework and comply with the requirements of the respective superordinate level.

The executive management of the respective Group company is responsible for implementing Group-wide and divisional Procurement Policy, adjusting them if necessary to account for local circumstances or legal requirements, and for creating the necessary organizational framework. In addition, each Group company must contain written documentation of the form in which procurement is structured and regulated.

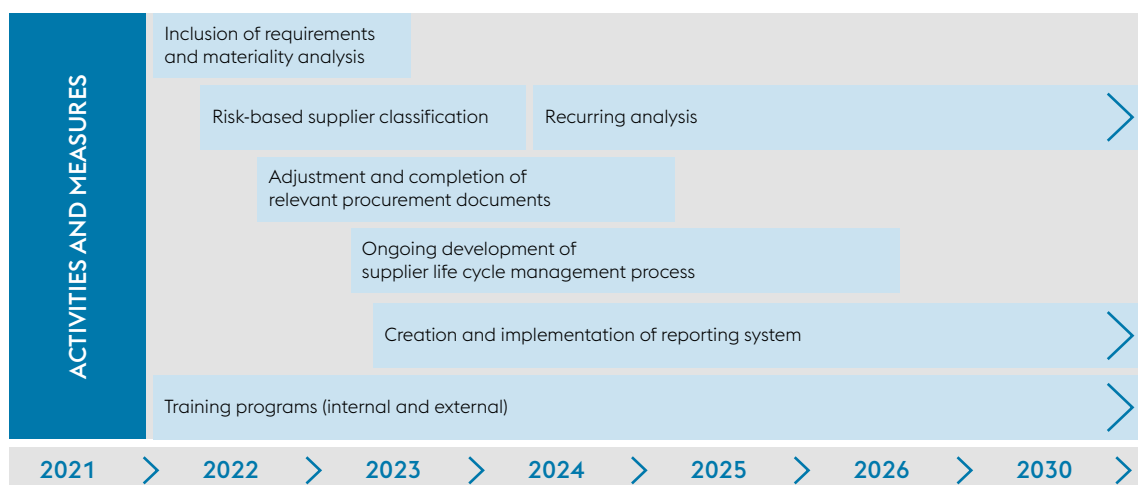
Another key measure related to value chain workers is the integration of the sustainability topic block into the training program of the Group procurement structure (Purchasing Power Academy). For more information, see S1-4.

In accordance with the requirements of the Supply Chain Due Diligence Act (LkSG), voestalpine has set up the new role of Human Rights Officer at each affected German voestalpine company. In addition, at Group level, the Head of Corporate Sustainability has been appointed Human Rights Officer of the voestalpine Group.

### SUSTAINABLE SUPPLY CHAIN ROADMAP

A strategic plan has been consistently pursued in recent business years in an attempt to ensure transparency and sustainability in the supply chain, thereby achieving important milestones (see figure) on the roadmap. The strategic plan is regularly reviewed and, where necessary, adapted.

## voestalpine ROADMAP OF SUSTAINABILITY ACTIVITIES



## POLICY OVERVIEW

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
Inappropriate or abusive working conditions in the value chain	Code of Conduct for Business Partners	Upstream value chain  Downstream value chain to a partial extent (excl. use by customers, self-pickups)	Responsible: Management Board/executive management  Monitoring and compliance regulations: Compliance organization	<ul style="list-style-type: none"> <li>» The result of numerous conversations and discussions at the level of the Management Board as well as among executive management and department heads of the voestalpine Group</li> <li>» The Code of Conduct as well as the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, and the core labor standards of the International Labor Organization (ILO)</li> <li>» Available in multiple languages on the intranet and on the website: <a href="https://www.voestalpine.com/compliance/en">https://www.voestalpine.com/compliance/en</a></li> </ul>
	Due Diligence User Manual	Upstream value chain  Downstream value chain to a partial extent (excl. use by customers, self-pickups)	Procurement board	<ul style="list-style-type: none"> <li>» Consider stakeholder analysis in policy</li> <li>» Internal communication to all users</li> </ul>

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
Inappropriate or abusive working conditions in the value chain	Human Rights Policy	Own operations  Own workforce (employees and non-employees)  Upstream value chain (business partners in the upstream value chain)	Head of Group Sustainability	» Available on the website
	Procurement Policy	Upstream value chain  Partial coverage of own operations  Partial coverage of the downstream value chain (excl. use and self-pickup)	Board of Procurement	» Consider stakeholder analysis in policy  » Communication to <a href="mailto:procurement@voestalpine.com">procurement@voestalpine.com</a>
	General Terms and Conditions of Purchase	Upstream value chain  Downstream value chain to a partial extent	Board of Procurement	» Consider stakeholder analysis in policy
	Sustainable Supply Chain Roadmap	Upstream value chain  Downstream value chain to a partial extent	Board of Procurement	» Consider stakeholder analysis in policy  » Communication to <a href="mailto:procurement@voestalpine.com">procurement@voestalpine.com</a>

## S2-2 – Processes for engaging with value chain workers about impacts

As an undertaking, voestalpine does not currently have a standardized process in place for engaging with value chain workers, apart from the whistleblower system, which can also be used by value chain workers. A corresponding procedure is currently being developed in preparation for the requirements of the CSDDD. In the absence of a formal procedure, value chain workers will be engaged in the event of an incident, such as suspected violations.

## S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns

### EXISTENCE OF A GRIEVANCE PROCESS

In addition to the risk-based due diligence process, voestalpine has set up an anonymous whistleblower system on its website for raising grievances and, if necessary, takes situation-specific action to remedy and compensate for any violations. The whistleblower system is available not only to internal employees, but also to workers in the value chain and other stakeholder groups to report possible violations of legal requirements or internal guidelines—such as voestalpine’s Code of Conduct for Business Partners (CoC-BP).

Business partners also undertake, according to the General Conditions of Purchase (GOP) and the Code of Conduct for Business Partners (CoC-BP), to inform their own employees and direct suppliers about the option of using the voestalpine whistleblower system. The system thus helps to identify potential negative impacts on value chain workers.

Unless there is a legal obligation to set up a whistleblower system, voestalpine recommends that its business partners establish an appropriate system that allows both open and anonymous reporting.

All reports are treated confidentially.

No further action is currently being pursued to inform value chain workers about the ways in which they can report concerns or complaints. At present, no assessment takes place to determine whether value chain workers are familiar with and trust these grievance mechanism structures or practices. voestalpine is working to establish a general mechanism for working with value chain workers to strengthen dialogue and communication in the long term.

Further information on the whistleblower system can be found in G1-1.

In the business year 2025/26, as in the previous year, no reports of violations pertaining to workers in the value chain (e.g., labor and human rights violations) were received via the whistleblower system or other communication channels.

#### **S2-4 – Taking action on material impacts and approaches to managing material risks, and pursuing material opportunities related to value chain workers and the effectiveness of those actions and approaches**

##### **SUPPLIER ASSESSMENT QUESTIONNAIRE (SAQ)**

Suppliers classified as potentially high or medium risk are subject to further risk assessment conducted in the form of the Supplier Assessment Questionnaire (SAQ). The SAQ reflects the requirements outlined in voestalpine's CoC-BP and is designed to:

- » Identify actual human rights and environmental risks
- » Obtain information and evidence on compliance with the voestalpine CoC-BP
- » Determine targeted supplier development actions including further reviews of supplier risk such as on-site audits

The SAQ is used to collect information on the following topics:

- » Compliance
- » Human rights and working conditions
- » Environmental protection and climate change mitigation
- » Management of the supply chain
- » Reporting of misconduct

The structure of the questionnaire is based on the requested information and evidence (see table below). This includes: policy documents (e.g., guidelines), documentation on existing management systems (e.g., various ISO certifications), communication information (content and channels), KPIs, and other information on specific issues (e.g., the sourcing of conflict minerals and climate targets).

### SAQ STRUCTURE WITH SAMPLE QUESTIONS AND THEIR PURPOSE

Topic	Sample question	Purpose
Policy/guideline	Does your organization have a formal policy in place (such as a code of conduct) that contains the requirements of the voestalpine Code of Conduct for Business Partners?	Guidelines show that the company is committed to a specific issue and has a policy in place (principles and values, benchmarks, targets, etc.)
Management approach/system	Does your site have an environmental management system in place?	Management systems demonstrate the existence of formal processes
Communication	How do you ensure that your employees are made aware of and comply with your internal guidelines/code of conduct or other guidelines on environmental protection and climate change mitigation?	Communication ensures that the guidelines and procedures are acknowledged, implemented, and observed
KPIs/further information	Has your undertaking set CO <sub>2</sub> emission reduction targets in its own operations and along the supply chain to work towards achieving the targets of the Paris Agreement (1.5°C target)?	Internal KPIs show commitment and verify the implementation of policies

If required, voestalpine assists its business partners with implementing the requirements. Where necessary, training for suppliers or on-site visits are carried out in order to improve their understanding and ensure the implementation of effective improvement measures. This requires the cooperation and participation of the business partners.

### SUPPLIER DEVELOPMENT

The engagement and active participation of suppliers and business partners is key to ensuring compliance with the voestalpine Code of Conduct for Business Partners. The due diligence process specifically helps vulnerable suppliers with inadequate sustainability performance to resolve identified shortcomings and taking corrective action. Following up on the performance evaluation helps to better understand and implement necessary changes. This process forms part of voestalpine's broader Supplier Development Program, which aims to continuously improve sustainability performance.

As shown in the table below, supplier training, capacity building, cooperation, and engagement complement suppliers' sustainable development activities.

### OVERVIEW OF SUPPLIER DEVELOPMENT ACTIONS

Supplier training and capacity building	Helping suppliers improve their practices with training and advice. This may include training on human rights, labor standards, environmental management, and prudent business conduct. Capacity building involves, for example, helping to solve specific issues faced by suppliers through the provision of expertise or supporting with the implementation of sustainable practices
Collaboration and engagement	Collaboration with stakeholders, including suppliers, civil society organizations, industry associations, and government agencies, is crucial when it comes to addressing systemic problems and promoting positive change

voestalpine reserves the right to take appropriate action (remedial and retaliatory) in the event of violations or an unwillingness to cooperate on the part of suppliers, which may ultimately lead to suspension or termination of the supply relationship.

A user-friendly IT system is used to collaboratively communicate with suppliers to collect their responses, analyze the questionnaires, and draw up action plans.

#### **CSDDD—PROJECT IMPLEMENTATION**

Other key actions related to value chain workers are implemented as part of the CSDDD project realization. The expansion of the due diligence process, including change management for procurement governance and supplier screening, is to be actively promoted.

The conditions required for the expansion of the due diligence process, which was previously limited to companies subject to the Supply Chain Due Diligence Act (LkSG), to the whole group and all suppliers are currently being established by voestalpine. A key prerequisite for the Group-wide management of due diligence is the introduction of a comprehensive database that permits systematic risk analysis and management. In a second step, the global harmonization and consolidation of due diligence actions takes place in order to ensure uniform implementation within the Group.

One starting point is voestalpine's existing Supplier Lifecycle Management system. This system involves a multi-stage process to establish, maintain, and develop relationships with suppliers. The focus is on the following aspects:

- » Ensuring supplier and delivery quality
- » Preventing and managing risks and threats
- » Establishing a transparently assessed pool of qualified suppliers
- » Complying with ESG and sustainability criteria

New suppliers are added to the database on the basis of risk and on a gradual basis. Supplier development is evaluated using a conventional supplier assessment. All relevant suppliers are classified as A, B, C, or D suppliers once a year. Depending on the product group, different criteria are included in the evaluation, such as environmental and quality management, social engagement, innovative strength, flexibility, and adherence to deadlines. A and B suppliers enjoy preferential treatment in the procurement process. C and D suppliers are used to define targeted corrective actions that are to be implemented within a defined period of time. The corresponding implementation of the corrected actions is reviewed, for example, in follow-up assessments or in correspondence with the responsible procurement functions.

On the basis of the initial risk assessment, voestalpine specifically requests additional evidence from risk-prone business partners as to the extent to which they meet the requirements of the Code of Conduct for Business Partners. This evidence is provided in the form of the Supplier Assessment Questionnaire (SAQ). Tasks, responsibilities, strategies, management systems, and performance indicators (KPIs) related to the content of the CoC-BP are requested and reviewed by voestalpine.

## OVERVIEW OF ACTIONS

IROs addressed	Action	Time horizon	Scope of the action	Significant expenditure (if relevant)/other comments
Inappropriate or abusive working conditions in the value chain	CSDDD— Project Implementation	April 2025–March 2028	Upstream value chain  Downstream value chain to a partial extent	Use of KPIs to monitor the share of sustainable suppliers
	Supplier Assessment Questionnaire (SAQ)	Ongoing	Upstream value chain— and downstream value chain to a partial extent—for high-risk suppliers	Communication to <a href="mailto:procurement@voestalpine.com">procurement@voestalpine.com</a>
	Integration of the sustainability topic block into the training program of the Group procurement structure (Purchasing Power Academy)	Ongoing	Upstream value chain  Downstream value chain to a partial extent  All buyers	Communication to <a href="mailto:procurement@voestalpine.com">procurement@voestalpine.com</a>

## METRICS AND TARGETS

### S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

voestalpine set itself the sub-target of reviewing at least 70% of the Group's total procurement volume—including 100% of all relevant raw material deliveries—in line with a defined process for the application of established sustainability criteria by the end of 2025. By the end of the business year 2025/26, it was confirmed that the Code of Conduct had been adopted for 72.5% of the procurement volume (2024/25: 35%). In addition, other suppliers were reviewed in accordance with the sustainability criteria, but are not yet included in specific targets. The overall target for increasing the proportion of sustainable suppliers stems from the sub-target explained above.

Due diligence focuses on suppliers that are more relevant to potential negative impacts to workers in the value chain. These include those at-risk suppliers that are classified as medium or high risk on the basis of the risk analysis, as well as recurring suppliers taking into account the purchase volume. The purpose of reviewing these suppliers is to systematically identify potential negative impacts, for example in relation to respect for fundamental labor rights and human rights. Targeted prioritization of these supplier groups enables effective management of corporate due diligence actions and supports the continuous improvement of sustainability performance in the supply chain.

## TARGET: INCREASING THE SHARE OF SUSTAINABLE SUPPLIERS

<b>KPI</b>	Proportion of at-risk suppliers who accept the voestalpine Code of Conduct for Business Partners	
<b>UNIT</b>	in percent	
<b>BASE VALUE</b>	<b>STATUS</b>	<b>TARGET VALUE</b>
n.a. 2021	<b>72.5% of the procurement volume</b> Business year 2025/26	<b>100%</b> 2029
<b>Responsibility and monitoring</b>	Board of Procurement	
<b>Scope</b>	Upstream value chain	
<b>Stakeholders</b>	Recurring suppliers (based on order volume)	
<b>IROs addressed</b>	Inappropriate or abusive working conditions in the value chain	
<b>Reference to policy</b>	All policies from S2	

The aim is to reduce risks associated with compliance with regulations, the infringement or violation of human rights, and environmental impacts, while at the same time meeting the defined sustainability criteria.

The review includes the assessment of whether suppliers accept the Code of Conduct for Business Partners and therefore meet the specified sustainability criteria. The sustainability criteria were defined and monitored on the basis of internal analyses and regulatory requirements. Direct engagement of value chain workers or their representatives is not yet envisaged.

voestalpine is aware that simply accepting the Code of Conduct does not imply actual compliance with its requirements. The target is therefore to be understood as a basic prerequisite for management and admittance and will be supplemented in the future by in-depth due diligence measures.

## ESRS S3 AFFECTED COMMUNITIES

This chapter examines the impacts of voestalpine’s business activities on affected communities. It outlines how the interests and needs of these communities are taken into account and the actions being taken to promote positive impacts and address any challenges.

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Affected communities	● Engagement with affected Communities	voestalpine supports charitable causes and works with the communities affected by its activities, involving them in its activities, impacts and plans. In addition, the company contributes to the social and economic development of the communities by creating jobs (Linz, Donawitz, Kapfenberg).  As a reliable employer, voestalpine ensures economic stability in many communities close to its sites.	>>>	●●●●	Local residents  Employees as well as the Works Council and trade unions  Politics (national, international)  Educational institutes and research (NGOs, NPOs)  Special interest and advocacy groups  Energy suppliers

**Key**

● Actual positive impact   ● Actual negative impact   ○ Potential positive impact   ○ Potential negative impact   + Opportunity   ! Risk  
 >>> Upstream   >>> Own operations   >>> Downstream   ●○○○ < 1 year   ○●○○ 1-5 years   ○○○● 5-10 years   ○○○● 10+ years

### IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

#### S3-1 – Policies related to affected communities

Transparency, honesty, respect, and confidentiality are the key values on which voestalpine basis its dialogue with stakeholders. The principles of cooperation with affected communities are governed by Group-wide guidelines which are also an integral part of the management system at sites and companies exposed to risk.

#### » Code of Conduct for voestalpine’s Lobbyists (Lobbying Code of Conduct)

This code sets out clear and transparent rules for the voestalpine’s lobbying activities. It governs dealings with stakeholders, including affected communities at major sites in Austria, as well as in Europe and on a global scale, in accordance with the Austrian Lobbying and Advocacy Transparency Act. (See G1-1 for more details.)

» **Communications policy**

The policy sets forth the main aspects of voestalpine's internal and external communications. These include fulfilling the notification obligations incumbent on a listed undertaking, cooperating with the media, sponsoring, communicating directly with affected communities using online and social media channels, and how to handle visits by politicians and business delegations. The policy also contains a separate chapter on crisis communication. Supplementary site-specific process instructions are issued with the aim of facilitating a rapid and situation-appropriate response—especially in the event of a crisis. The process instructions regulate the corresponding procedures and responsibilities for external communication.

» **HR Strategy 2030+**

The HR Strategy 2030+ aims to strengthen voestalpine's position as an attractive employer and to make a decisive contribution to the company's competitiveness by acquiring, developing, and retaining qualified and motivated employees in the long term (see S1-1). By strategically anchoring key areas of activity within the Group—such as apprenticeship, health and safety at work, female empowerment, and work-life balance—voestalpine creates a secure working environment that has a positive impact on affected communities beyond the company's borders and contributes to economic stability in the regions where it is based. The economic and social contribution made by voestalpine is published with transparency on its website, as noted in ESRS 2 SBM-3 S3.

As outlined in S1-1, voestalpine is fully committed to upholding human rights in compliance with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the Core Labor Standards of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises, and the UN Global Compact. This is also enshrined in the voestalpine Code of Conduct and in its Human Rights Policy. In the business year 2025/26, as in the previous year, no human rights violations or violations of the aforementioned guidelines and guiding principles were reported.

## POLICY OVERVIEW

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
Engagement with affected communities	Code of Conduct for voestalpine's Lobbyists (Lobbying Code of Conduct)	Own operations External lobbyists	Responsible: Management Board/executive management  Monitoring and compliance regulations: Compliance organization	<ul style="list-style-type: none"> <li>» The result of numerous conversations and discussions at the level of the Management Board as well as among executive management and department heads of the voestalpine Group</li> <li>» Available in several languages on the intranet and on the website <a href="https://www.voestalpine.com/compliance/en">https://www.voestalpine.com/compliance/en</a></li> </ul>
	Communications policy	Own operations	Responsibility and monitoring: Head of Group Communications	<ul style="list-style-type: none"> <li>» Takes into account communication with external parties (politician visits, press, media relations, social media, etc.)</li> <li>» Available on the intranet</li> </ul>
	HR Strategy 2030+	Own operations All employees  Specific stakeholder groups: women	HR Board	<ul style="list-style-type: none"> <li>» Respect for the Diversity Charter</li> <li>» Involvement of stakeholders through environmental analysis and ongoing participation in working groups and competence teams</li> <li>» Communication on employee webpages, on the external podcast, and at Supervisory Board meetings</li> </ul>

### S3-2 – Processes for engaging with affected communities about impacts

voestalpine pursues a comprehensive, structured stakeholder communication strategy across its sites which encompasses both Group-wide processes and direct dialog with local stakeholders. Short-term or unforeseeable occurrences on affected communities are mainly covered by the direct or indirect reporting systems in place (e.g., noise or emissions caused by technical defects or specific operating procedures). For this purpose, regulations for emergency communication have also been implemented at sites exposed to risk. Additional stakeholder activities are planned on a regular basis, typically at the beginning of a calendar year with updates throughout the year, by the relevant departments and Group Public Affairs with the involvement of experts from the companies concerned. Ultimate responsibility for stakeholder dialogues and their approval lies with the responsible chairperson or member of the Management Board. Progress is reviewed on an ongoing basis and the measures revised where necessary.

Taking into account the decentralized, global structure of voestalpine, with the necessary control at Group level as well as the standards in place for stakeholder communication, the process is designed to enable implementation as efficiently, unbureaucratically, and quickly as possible, while ensuring coordinated and consistent communication across all major stakeholder groups. The process described below sets out the previously described working method in which specific activities are developed, coordinated, and implemented.

## PHASE 1: STAKEHOLDER MAPPING

This step determines which stakeholders are affected by potential impacts and, if so, prioritizes their involvement. An example of this is the environmental impact assessment for upgrading the power grids for the first stage of greentec steel (expansion from 110 to 220 kV). Here, the local communities primarily affected and their potential objections were identified at an early stage in order to plan further activities together with authorities and project partners.

## PHASE 2: STAKEHOLDER COMMUNICATION

Communication with stakeholders is organized Group-wide as an interdisciplinary function. Group Public Affairs works with Group Sustainability, Research & Development, the Group's energy network, the Works Council, and other parties to ensure a consistent approach toward external stakeholders. To facilitate this, periodic exchanges take place, for example at recurring meetings with the above-mentioned departments. These formats are not only used for internal coordination, but also to reflect on external perspectives: Insights, concerns, and expectations from the dialogue with stakeholders are incorporated into the technical debates and decision-making processes of the participating departments, where they are processed further. These platforms also help voestalpine to assess the effectiveness of working with affected communities.

The following table shows the type and frequency of engagement with affected stakeholders:

Stakeholders	Type of engagement	Frequency of engagement
Local residents	Direct dialogue for questions/complaints (telephone, e-mail) Proactive involvement in larger projects (e.g., projects communicated in advance at information events; media; social media channels)	Event and topic-related
Employees and their representatives	Discussions and communications on the latest transformation topics, policy positions, and shared perspectives and activities; for example, at regular meetings of the Works Council or on an ad hoc basis for certain topics with regard to current social policy aspects	Periodically, e.g., at works council meetings and events at Group or site level with varying frequency
Legislative and executive powers at national and European level (government, EU Commission, parliaments)	Participation in policy-making through topic-based bilateral outreach and peer review processes; participation in working groups, e.g., in ministries and in the framework of the EU Commission (Directorates-General); topic-based exchange with parliaments (e.g., specialist committees and representatives); participation in dialogue formats (e.g., the EU Commission's Strategic Dialogue on Steel, the site strategy, and the Climate-Neutral Industry initiative in Austria)	Event and topic-related
Political think-tanks; academic and research institutions; civil society and NGOs	Dialog maintained primarily within the framework of current topic and working groups (e.g., Austrian carbon management strategy, hydrogen, electricity market)	Event and topic-related
Legal and voluntary lobbying groups at national and European level	Representation in management and specialist committees, participation in the development of positions and lobbying priorities	Periodic (e.g., quarterly Executive Committee and twice-yearly General Assembly at EUFOER) Event and topic-related
Energy industry and energy-intensive industries	Informal exchange on common topics with the energy industry (e.g., electricity market design, hydrogen) Alliances at national and European level with other energy-intensive companies for joint positioning on key policy issues	Event and topic-related

Using the example of the installation of the 220 kV power line, this means that public forums have been set up in which the various stakeholder groups (citizens' initiatives, civil society and individuals) have been able to voice their concern to grid operators, voestalpine, the authorities or local government. The concerns raised were discussed jointly and, where technically possible, taken into account in the further course of the procedure.

In order to train employees with respect to communication with affected communities, voestalpine provides mandatory training on human rights and compliance (see chapters S1-4 and G1-3). Specific training is also available for senior executives on sustainability.

### **PHASE 3: MONITORING AND REVIEW**

The main communication objective of voestalpine is to implement projects on time and in agreement with local residents through transparent and timely engagement of the affected communities and by making changes on the basis of this engagement.

In the case of the greentec steel transformation program, the measures taken were continuously evaluated. Together with the project partners, the authorities, and the departments responsible for stakeholder communication within voestalpine, experts from the greentec steel project team, and the colleagues responsible for administrative procedures, this objective was achieved with the final approval of the environmental impact assessment by the Federal Administrative Court, and implementation of Austria's largest industrial climate protection program started on schedule. At the same time, it was possible to avoid the risk of the tight schedule being jeopardized due to a lack of connection to the grid and complaints from local residents.

#### **S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns**

No material negative impacts on affected communities were identified. At the sites in Linz, Donawitz, and Kapfenberg, the company is subject to close regulatory monitoring and public scrutiny. voestalpine has also implemented processes that are specifically geared toward maintaining dialogues with affected communities—such as local residents. If unforeseen events occur during normal production and business activities, these site-specific procedures offer affected parties an immediate opportunity to get in touch and provide feedback. Depending on the situation, this involves examining whether there are any legal reporting obligations or whether an in-depth dialogue with the affected groups is necessary, and which remediation measures can be taken.

#### **PROCESSES AT THE LINZ SITE**

An environmental officer has been appointed at the Linz site since 1985, who is responsible for the legal requirements relating to the protected assets of air, water, soil, and noise. A specially established environmental on-call service therefore ensures that a qualified contact person is available around the clock for environmentally relevant incidents and also for internal and external environmental concerns. Immediate action is taken in line with a site-specific emergency plan together with the task force and, if necessary, the competent authorities are notified.

The on-call service also provides the point of contact for external complaints. Accordingly, any type of complaint will be investigated immediately, action will be taken if necessary, and the complainant will be informed about the status of the complaint if desired. Foreseeable environmental events, such as expected noise or dust emissions, are communicated in advance to the decentralized communication departments and, if necessary, to the media and authorities. External inquiries or complaints

reach the environmental on-call service either through internal bodies—such as the switchboard or factory security—or are forwarded by authorities (e.g., Linz municipal authorities or the Upper Austrian Government).

The environmental on-call service centrally documents all incidents and complaints relevant to the environment and the actions taken. The handling of environmental incidents and complaints as well as the associated documentation is reviewed on an annual basis within the framework of an external audit, which ensures the effectiveness of the implemented processes and reporting channels.

#### **PROCESSES AT THE DONAWITZ SITE**

At the Donawitz site, concerns raised by local residents are channeled through the Legal department, and forwarded to the Management Systems department in the event of complaints. The department works together with the respective operational unit (e.g., blast furnace, steelworks), to undertake an internal root cause analysis and initiate corrective measures, as well as to document the measures in a corrective measures sheet. Feedback to local residents as well as central documentation are managed by the Legal department. The complaints are reported and analyzed internally as part of the management report. The effectiveness of the implemented processes is ensured by an external audit.

#### **PROCESSES AT THE KAPFENBERG SITE**

At the Kapfenberg site, clear responsibilities, structured processes, and permanent accessibility ensure compliance with all environmental and site-relevant requirements. A central unit coordinates all activities relating to air, water, soil, climate and noise, and acts as a liaison with the authorities, internal committees, and external stakeholders. 24/7 availability ensures that the system reacts immediately to environmental events or technical faults. In the event of an incident, measures are taken immediately and, if necessary, the authorities are informed. The central unit also serves as a contact point for external complaints and ensures prompt, transparent handling. All incidents, complaints and measures taken are documented centrally. Operations are reviewed annually through internal and external audits to ensure that processes work, communication is reliable, and improvements are continuously implemented. Through proactive communication, reliable reporting channels, and robust emergency and environmental management, the Kapfenberg site contributes to safe, transparent and sustainable operations and meets both legal requirements and public expectations.

In addition to these site-specific processes, reports can be submitted anonymously using the whistleblower system, which is available in 14 languages. Details on this and an overview of the number of cases can be found in chapter G1-1. Complaints can also be submitted using the general e-mail addresses and contact forms on the voestalpine website and on the websites of the respective divisional subsidiaries.

Another communication channel is the Group's social media channels, which are listed under the following link: [www.voestalpine.com/group/en/media/social-media](http://www.voestalpine.com/group/en/media/social-media). A social media listening tool is used to monitor the Group's own channels and external comments. Responses to users are provided by Group Communications or commissioned agencies according to a defined process. A platform strategy is in place for each social media channel that is geared toward target groups.

There is no systematic survey to determine the extent to which affected communities are aware of the various reporting channels and consider them to be trustworthy. Protection against retaliation measures is regulated in voestalpine's Code of Conduct. More information on the retaliation measures is available in G1-1.

### **S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions**

Engagement with affected communities at the Linz, Donawitz, and Kapfenberg sites was identified as a material positive impact on affected communities. The focus is therefore on the ongoing expansion of cooperation and dialogue with affected communities in the vicinity of the Austrian voestalpine production sites. Action taken aims to improve early engagement with affected communities in current and planned projects. Due to the Group's decentralized structure, these actions are primarily planned and implemented at the site, company, and divisional level, in each case in coordination with the responsible Group divisions. In addition to executive management at company, divisional, and Group level, the Group Public Affairs, Group Communications, and Legal departments are involved in managing the key IROs.

Examples of effective management in communications with affected communities include the 110 to 220 kV power line expansion (see chapter S3-2) and the construction of the special steel plant in Kapfenberg.

As part of the construction of the stainless steel plant in Kapfenberg, various actions have been implemented to take the perspectives of the affected stakeholders into account at an early stage and to be able to respond accordingly. Before the start of construction, a dialogue office was set up to give local residents the opportunity to obtain information directly and to raise any concerns they have. In addition, a telephone hotline and a separate e-mail address were provided. A dedicated website provided information on the project, supplemented by a local info-point, which included a message box for people without internet access. In addition, information events were organized to enable a timely response to any concerns and suggestions raised by the public.

The actions listed for stakeholder engagement have helped the affected communities to obtain information, raise concerns, and actively participate in shaping the projects. At the same time, uncertainties were reduced and greater acceptance achieved.

In addition to the project-related actions, voestalpine also fulfills its corporate social responsibility throughout the Group. Initiatives in the arts, culture, and sports as well as in the social arena are pursued at the different sites and supported through monetary donations and donations in kind. One special example of this is the voestalpine cares run, which will be held for the fourth time in spring 2026.

#### **voestalpine CARES RUN—“TOGETHER WE MOVE THE WORLD”**

The voestalpine cares run is a Group-wide social responsibility program that motivates employees to engage in joint sporting activities, combining social commitment with health promotion. Based on achieved activity goals, donations of up to a total of EUR 700,000 for social cooperation partners are gradually released via an app.

The funds support selected projects near Austrian and international production sites, including in India, Indonesia, and Ukraine. The projects funded in 2026 with international and national partner organizations focus on promoting access to education, basic health care, and emergency humanitarian aid.

In order to track the lasting positive impact of these donations on the affected communities, voestalpine receives project reports and final reports from the beneficiary institutions in order to be able to review the impact and use of funds for project management purposes.

As an employer, voestalpine also contributes to economic stability in the individual regions in which it is located. Measures in this context stem directly from business activities, such as the personal development and training of employees, a targeted apprenticeship campaign and the BÖHLER CAMPUS, and health and safety initiatives. See chapter S1-4 for more details.

## OVERVIEW OF ACTIONS

IROs addressed	Action	Time horizon	Scope of the action	Significant expenditure (if relevant)/ other comments
Engagement with affected Communities	Site and project-dependent package of measures	Dependent on actions taken	Local residents in the vicinity of voestalpine sites  Production facilities in Linz, Donawitz, and Kapfenberg  Upstream value chain to a partial extent	Integration of various stakeholder interests

## METRICS AND TARGETS

### S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

As a result of the largely site-specific and event-related measures to promote positive impacts, apart from the Group-wide strategic goals—in particular in relation to decarbonization and sustainability—there are currently no separate, time-limited, and outcome-oriented targets in relation to affected communities.

Nevertheless, there are indicators to demonstrate successful stakeholder engagement management at voestalpine, such as the evidence of positive economic and social impacts on the environment at its production sites (see <https://www.voestalpine.com/oesterreich/de/>).

In addition, regular audits (internal audit, EMAS audit) are conducted to ensure the compliance of internal processes.

A continuous exchange with all relevant stakeholders ensures that concerns and suggestions can be addressed at an early stage. The success of the described policies and actions is determined by assessing whether voestalpine has achieved the legal certainty and calculability of its strategic targets at the end of the respective projects.

# GOVERNANCE INFORMATION

## ESRS G1 BUSINESS CONDUCT

Responsible business conduct forms the basis for lasting success and social trust. The focus in this regard is on key issues such as business ethics and upholding a value-based corporate culture characterized by integrity, transparency, and active anti-corruption and bribery practices. The protection of whistleblowers plays just as important a role as the respectful and fair treatment of all stakeholders. Clear principles have also been established to govern supplier relationships: fair payment practices and a dialogue based on partnership—especially with small and medium-sized enterprises—are essential. When combined, these aspects form the basis of modern business conduct, which is actively practiced and continuously developed at voestalpine.

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Business ethics and corporate culture	● Shared values at voestalpine	voestalpine maintains a respectful corporate culture that values innovation, diversity, self-determination, and personal responsibility. The corporate culture at voestalpine is based on the values of entrepreneurial mindset, mutual respect, and sustainable action	>>>	●●●●	Employees
	● Practiced corporate ethics	voestalpine promotes ethical conduct along its value chain in accordance with the principles and requirements of the Code of Conduct and the Group guidelines as well as the resulting actions	>>>	●●●●	Employees Business partners
	! Violation of compliance guidelines and white-collar crime	Violations of the Code of Conduct, Group-wide policies, and applicable laws (including, but not limited to, antitrust, corruption, and fraud) pose a material risk in the downstream value chain and own operations. The materiality arises in particular from potential reputational damage as well as financial and legal implications such as fines, claims for damages and liability risks	>>>	●●●●	Employees Business partners

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description	Value chain	Time horizon	Affected stakeholders
Management of relationships with suppliers including payment practices	○ Selection process for suppliers	voestalpine applies environmental and social criteria as part of its supplier selection processes, thereby supporting efforts to ensure sustainable procurement. The selection process is based on a risk-based approach, in which industry and country-specific risks are taken into account during the process. In addition, the type and volume of raw materials purchased and the supply conditions influence the selection. This supports the responsible and long-term management of supplier relationships	>>>	●●●●	Suppliers

**Key**

● Actual positive impact   ● Actual negative impact   ○ Potential positive impact   ○ Potential negative impact   + Opportunity   ! Risk  
 >>> Upstream   >>> Own operations   >>> Downstream   ●○○○ < 1 year   ○●○○ 1 – 5 years   ○○○○ 5 – 10 years   ○○○● 10+ years

## IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

### G1-1 – Corporate culture and business conduct policies

#### CORPORATE VALUES

Shared values act as a strong anchor that provides security, support, and orientation. They strengthen the corporate culture and sense of unity. In addition, binding corporate values support the implementation of the Group strategy and provide the basis for specific rules and operational guidelines.

#### ENTREPRENEURIAL MINDSET

##### We are guided by success.

Our approaches and actions are entrepreneurial. Our passion for solutions and innovation provides the basis for joint action. We are team players primed for success because we always seek the best possible outcome together.

In so doing, we always work to our customers' benefit while also considering our other stakeholders. We strive for excellence in our actions—and let it be our guide.

## THE PRACTICE OF RESPECT

**We build upon our diversity as a team.**

We are respectful and fair toward each other, our customers, and our partners.

We trust each other and align with values common to us. We create a motivating work environment infused with team spirit, where respectful cooperation is at the core of our actions, day in and day out.

## SUSTAINABLE PRACTICES

**We perform our jobs responsibly.**

In our daily work, all of us act autonomously within defined responsibilities, demanding and fostering high degrees of individual responsibility. We remain curious and do not rest on our laurels; instead, we constantly evolve together to bring about continual improvements. Our actions are sustainable, proactive, and forward looking.

It is our corporate culture that makes us who we are: One step ahead.



VALUES  
CULTURE



ENTREPRENEURIAL  
MINDSET



THE PRACTICE OF  
RESPECT



SUSTAINABLE  
PRACTICES

The corporate culture significantly influences the success of a company by shaping the values and behaviors of employees and promoting cooperation. The voestalpine culture is continually being refined to strengthen our Group-wide identity in this sense.

Corporate culture can be indirectly evaluated through employee surveys by assigning the questions to one or more company values to the greatest possible extent. This allows correlations and conclusions about the company values to be derived. The results of the 2024 employee survey were reported to the Management Board at a board meeting.

The Code of Conduct forms the foundation of the corporate culture. It sets out the ethical standards and behaviors that voestalpine expects from all employees and reflects the Group's commitment to integrity, transparency, and corporate social responsibility. Since 2013, voestalpine has supported the UN Global Compact (UNG) with its ten principles that address labor standards, environmental protection, and the fight against corruption alongside the promotion of human rights. voestalpine is therefore opposed to all forms of corruption, including extortion and bribery.

## **CODE OF CONDUCT AND COMPLIANCE GUIDELINES BASED ON IT**

Our employees are integral to the Group's success and are therefore key to both the trust placed in voestalpine and its reputation. This is precisely why it is important to establish unequivocal principles on matters of ethics and morality in business. The Code of Conduct and the compliance guidelines based on it provide the relevant parameters to that end. By providing guidance to employees in their daily actions and decisions, it shapes the corporate culture by making every employee a role model. The Management Board is explicitly and emphatically committed to both this Code of Conduct and a zero-tolerance policy toward violations thereof.

The Code of Conduct requires voestalpine companies in all countries in which they operate and all their employees to comply with all applicable laws. It also set forth how to handle dealings with stakeholders such as customers, suppliers, employees, and other business partners.

The voestalpine Code of Conduct was enshrined in writing in 2009. It is the result of numerous conversations and discussions at the level of the Management Board as well as among executive management and department heads of the voestalpine Group. It is based on the Group's corporate values and provides the basis for ethically and legally sound conduct on the part of all of the Group's employees. The principles and requirements documented in the voestalpine Code of Conduct and in the Code of Conduct for Business Partners are rooted in the Human Rights Policy, the UN Guiding Principles (UNGPs) on Business and Human Rights, the principles enshrined in the UN Global Compact (UNGC), the International Bill of Human Rights, the Core Labour Standards promulgated by the International Labour Organization, and the United Nations Convention against Corruption.

The Code of Conduct and the directives based on it (compliance guidelines) are continuously evaluated and, if necessary, adapted to take into account new social and legal requirements. Most recently for instance, necessary adjustments were made to the Code of Conduct due to the EU Directive on transparent and predictable working conditions, and the topics of tax and biodiversity were explicitly anchored in the Code. The Code of Conduct has been published in more than 20 languages and can be downloaded from the Internet: <https://www.voestalpine.com/compliance/en>

<p><b>Compliance and responsible business conduct</b></p>	<p><b>Social responsibility</b></p>
<ul style="list-style-type: none"> <li>» Compliance with laws and other regulations</li> <li>» Competition and antitrust law</li> <li>» Corruption, bribery, and acceptance of gifts</li> <li>» Taxes</li> <li>» Money laundering</li> <li>» Conflicts of interest</li> <li>» Prohibition of abuses of insider information</li> <li>» Data privacy and protection</li> <li>» Trade restrictions and sanctions</li> <li>» Conflict minerals</li> <li>» Secrecy of confidential information</li> <li>» Intellectual property</li> <li>» Protection of corporate property and IT usage</li> <li>» Corporate communications</li> </ul>	<ul style="list-style-type: none"> <li>» Respect for human rights and working conditions</li> <li>» Prohibition of child labor</li> <li>» Prohibition of forced and bonded labor, human trafficking, and modern slavery</li> <li>» Collective bargaining and the right to freedom of association</li> <li>» Diversity, equal opportunities, and ban on discrimination</li> <li>» Remuneration</li> <li>» Working time</li> <li>» Local communities and indigenous peoples</li> <li>» Security personnel</li> <li>» Donations and sponsorships</li> <li>» Workplace safety</li> <li>» Human rights in the supply chain</li> </ul>
<p><b>Environmental protection and climate change mitigation</b></p>	<p><b>Reporting misconduct</b></p>

The Code of Conduct applies to all members of the Management Board, the managing directors, and the non-executive employees of all entities in which voestalpine AG has a direct or indirect interest of at least 50% or which it controls in some other way. As regards all other companies in which voestalpine AG has a direct or indirect stake of at least 25% but does not control them, the Code of Conduct is brought to their attention with the request that they enforce it by having their corporate decision-making bodies recognize it of their own volition.

Any employee who violates laws, regulations, internal guidelines, rules, and instructions, or provisions of the Code of Conduct may be subject to disciplinary measures. Moreover, violations may also have consequences under criminal and/or civil law, e.g., claims to compensation and claims for damages.

voestalpine aims to have the Code of Conduct apply throughout its sphere of influence. Suppliers and consultants are required to comply with the Code of Conduct for Business Partners (see details below) and are called on to respect and observe human rights as fundamental values.

All of voestalpine's business partners are also requested to reasonably promote adherence to the Code of Conduct among their own business partners along the supply chain. Additionally, Group companies are urged to bring the Code of Conduct to the attention of their customers and to strongly encourage them to commit to compliance therewith.

voestalpine AG has adopted several Group guidelines that serve as a helpful tool for employees in applying the Code of Conduct. The compliance rules and regulations associated with the voestalpine Code of Conduct currently comprise the following and can be found on the Intranet:

### **Business Conduct Policy**

These guidelines supplement and flesh out the Code of Conduct with respect to issues of corruption, bribery, acceptance of gifts, and conflicts of interest. For example, they regulate the permissibility of gifts, invitations, and other benefits; donations and sponsoring; secondary employment as well as the private purchase of goods and services by voestalpine employees from customers and suppliers. The section entitled Business conduct also addresses the prohibition of political contributions. The voestalpine Group does not allow donations to politicians, political parties, organizations affiliated with political parties, or political front organizations. This does not apply to political precursor organizations that are devoted solely to social issues and have been individually approved by the Management Board of voestalpine AG.

### **Guideline on dealings with brokers and consultants**

This guideline contains additional supplemental information on issues of corruption, bribery, and the acceptance of gifts. It defines the procedure to be complied with prior to engaging sales representatives, agents, and other marketing consultants. Conducting an objective analysis of business partners' environment and scope of activities (business partner check) before establishing business relationships with them serves to ensure that the business partners also comply with both applicable law and the voestalpine Code of Conduct.

### **Antitrust Policy**

This guideline describes the prohibition of agreements restricting competition, establishes rules for dealing and interacting with industry associations, professional associations, and/or other sector organizations, and defines particular rules of conduct for all employees of the voestalpine Group. Additionally, manuals have been developed with respect to issues of information sharing and benchmarking, procurement alliances, and supplier relationships with competitors, which provide employees with information on these topics from an antitrust perspective.

### **Compliance manual and compliance violation prevention program**

These rules and regulations explain voestalpine's compliance management system and provide information on the Group's compliance strategy and compliance structure. They likewise set forth the responsibilities for processing suspected compliance incidents, such as allegations of corruption or bribery. They also provide information on steps taken to prevent and identify compliance violations as well as on the potential repercussions and sanctions such violations may trigger. Information on the web-based whistleblower system, which allows compliance violations to be reported anonymously, can also be found in these regulations. Further information on the whistleblower system can be found below.

### **Code of Conduct for Business Partners**

These rules and regulations that are directed toward suppliers of goods and services as well as toward brokers, consultants, and other business partners define the principles and requirements for doing business with voestalpine. Among other things, voestalpine requires its business partners to respect and comply with human rights as fundamental values in accordance with the International Bill of Human Rights, the UN Guiding Principles (UNGPs) on Business and Human Rights, and the Core Labor Conventions of the International Labor Organization (ILO). In particular, this applies to the prohibition of child and forced labor; the prohibition of human trafficking in any way, shape, or form; the equal treatment of employees; and the right to employee representation and collective bargaining. Business partners must also undertake to comply with environmental protection standards and to set scientifically verifiable targets for reducing their carbon footprint. In fact, the business partners must abide by their commitments not just in their own sphere of activity; they must also require their own suppliers to act accordingly and must verify compliance with these commitments in the supply chain. The Code of Conduct for Business Partners has been published in several languages and can be downloaded from the Internet: <https://www.voestalpine.com/compliance/en>

### **Code of Conduct for voestalpine's Lobbyists (Lobbying Code of Conduct)**

voestalpine's Lobbying Code of Conduct regulates dealings with stakeholders in Austria as well as in Europe and internationally in accordance with the Austrian Lobbying and Advocacy Transparency Act in order to provide a clear and transparent framework for lobbying activities. Just as with the general Code of Conduct, the Lobbying Code of Conduct is also binding for all members of the Management Board, the managing directors, and the non-executive employees of all entities in which voestalpine AG has a direct or indirect interest of at least 50% or which it controls in some other way. Whenever lobbying activities are supported by external parties, care must be taken to ensure that the latter also commit to compliance with the present Code of Conduct. The Lobbying Code of Conduct has been published in German and English and can be downloaded from the Internet: <https://www.voestalpine.com/compliance/en>

## **MECHANISMS FOR IDENTIFYING, REPORTING, AND INVESTIGATING CONCERNS ABOUT UNLAWFUL CONDUCT**

### **Responsibility and compliance organization**

Upholding the compliance requirements is the responsibility of every member of every management board, every CEO and executive, and every employee. The management board/executive management of each Group company is responsible for effectively implementing, maintaining, and continuously improving voestalpine's compliance management system, which is based on the Group compliance guidelines. The voestalpine Group has established an internal compliance system to help management fulfill this responsibility, and to set up the processes and control mechanisms required to that end. Aside from a Group Compliance Officer, a Divisional Compliance Officer has been appointed for each division; additional Compliance Officers are appointed in particular divisional sub-units. The Group Compliance Officer reports directly to the Chairman of the Management Board. The Divisional Compliance Officers report to both the Group Compliance Officer and the respective division heads who are members of the Management Board.

## COMPLIANCE ORGANIZATION

voestalpine AG				
Group Compliance Officer				
Steel Division	High Performance Metals Division	Metal Engineering Division	Metal Forming Division	Holding & Group Services
Divisional Compliance Officer	Divisional Compliance Officer	Divisional Compliance Officer	Divisional Compliance Officer	Group Compliance Officer
Compliance officer in larger sub-units	Compliance officer in larger sub-units	Compliance officer in larger sub-units	Compliance officer in larger sub-units	

Group and Divisional Compliance Officers are appointed and dismissed by voestalpine AG's Management Board; the member of voestalpine AG's Management Board responsible for each individual division has a right of nomination with respect to divisional Compliance Officers. Any additional Compliance Officers who may be appointed at the level of divisional sub-units are appointed and dismissed by the respective operating company of that division.

Compliance officers are responsible for the following topics:

- » Antitrust law
- » Corruption
- » Compliance with capital market regulations
- » Fraud (internal cases of theft, fraud, misappropriation, or embezzlement)
- » Conflicts of interest
- » Special topics assigned to the Compliance organization by the Management Board of voestalpine AG (e.g., in connection with issues related to UN or EU sanctions)

All other Compliance issues—e.g., environmental law, taxes, invoicing, labor law, protection of employees, or data privacy—do not fall under the purview of the Compliance Officers' powers. Other organizational units are responsible for these compliance issues.

In addition to management, the Compliance organization also supports employees in complying with the compliance requirements, including through regular on-site and online training, training, management discussions, and ongoing information initiatives. Awareness campaigns are also conducted regularly to increase awareness of compliance within the Group. More information on training can be found in chapter G1-3 under "Preventive activities."

## Whistleblower system

<https://www.bkms-system.net/voestalpine>



The voestalpine Group encourages all employees who observe any violations, or who have seen activities which they suspect might constitute a violation, to report the occurrence. Pursuant to the Code of Conduct, such reports may be addressed to the individual's direct supervisor; the appropriate legal or human resources department; the management of the respective Group company; the Internal Audit and risk management departments of voestalpine AG; the Group Compliance Officer; or one of the Divisional Compliance Officers. Upon request, whistleblowers are ensured of absolute confidentiality. Employees who report identified violations of laws, the Code of Conduct, or other internal guidelines and regulations will not be subject to reprisals or negative consequences of any kind. This also applies to other persons who contribute important information for the investigation of such misconduct. This provision is in accordance with the applicable law transposing Directive (EU) 2019/1937 ("Whistleblower Directive").

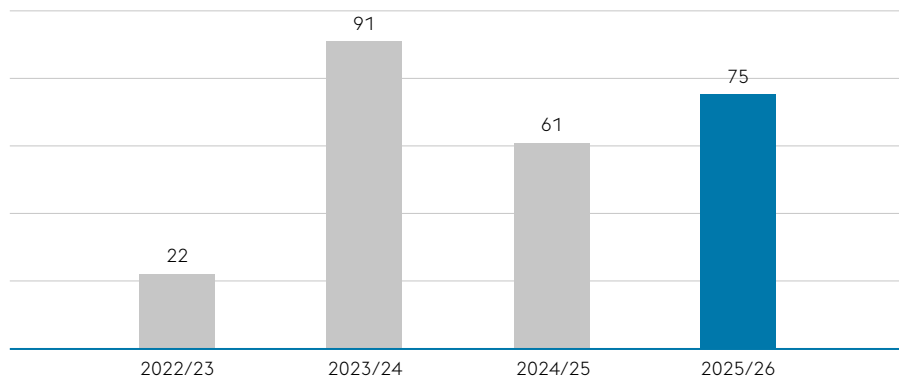
Furthermore, an option to anonymously report violations via a web-based whistleblower system has been available since 2012. The voestalpine Group relies on the EQS Group's many years of expertise with the BKMS® system, the anonymity of which has been certified by an independent body, in this regard. The BKMS® system can be used by both employees and external whistleblowers. The areas for which misconduct can be reported on the whistleblower system were extended in 2022/23 business year to include the following topics:

- » Antitrust, corruption, fraud, conflicts of interest, capital market compliance
- » Discrimination, sexual harassment, bullying, human rights
- » Data privacy and protection
- » Technical compliance with special reference to adhering to technical standards and certifications in production processes and IT security
- » Environmental Information
- » Health and safety
- » Violations in other areas

The whistleblower system allows the appropriate Compliance Officers to communicate with whistleblowers while maintaining absolute anonymity. Since the expansion of reporting options in December 2022, a total of 246 incidents have been reported in different areas. The system has established itself as a trusted point of contact and is widely used. The high level of acceptance shows that employees and other authorized persons actively use the whistleblower system to report grievances or irregularities.

## NUMBER OF REPORTS RECEIVED ON THE WHISTLEBLOWER SYSTEM

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Information on the various reporting channels—in particular the whistleblower system—is generally available both on the intranet and on the voestalpine website at <https://www.voestalpine.com/group/en/group/compliance/reporting-misconduct/>. Employees are also informed about the reporting channels and the process for reviewing reports, and receive training on how to use the system. This is achieved by sending emails to the workforce or with posters, for example, as well as through on-site and online compliance training courses. More information on training can be found in chapter G1-3 under “Preventive activities.”

voestalpine’s compliance management system described here and in chapter G1-3 comprises clear rules of conduct, internal control mechanisms, a whistleblower system, and training programs designed to ensure that risks of corruption and bribery are systematically identified, assessed, and effectively managed. During the reporting period, voestalpine’s compliance management system in the areas of antitrust law, corruption and the whistleblower system for the Austrian Group companies were certified by Austrian Standards in accordance with internationally recognized standards (ISO 37301:2021, ISO 37001:2025, ISO 37002:2021). The corresponding certificate can be viewed on the website at <https://www.voestalpine.com/compliance/en>.

## POLICY OVERVIEW

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
<p>Shared values at voestalpine</p> <p>Practiced corporate ethics</p> <p>Violations of compliance guidelines and white-collar crime</p>	Code of Conduct	Own operations	<p>Responsible: Management Board/executive management</p> <p>Monitoring and compliance regulations: Compliance organization</p>	<ul style="list-style-type: none"> <li>» The result of numerous conversations and discussions at the level of the Management Board as well as among executive management and department heads of the voestalpine Group</li> <li>» The Code of Conduct and the directives based on it (compliance guidelines) are continuously evaluated and revised where necessary</li> <li>» The Code of Conduct forms the basis for all guidelines arising from voestalpine's compliance regulations</li> <li>» The International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, and the core labor standards of the International Labor Organization (ILO)</li> <li>» Available in over 20 languages on the intranet and on the website: <a href="https://www.voestalpine.com/compliance/en">https://www.voestalpine.com/compliance/en</a></li> </ul>
	Code of Conduct for Business Partners	Business partners	<p>Responsible: Management Board/executive management</p> <p>Monitoring and compliance regulations: Compliance organization</p>	<ul style="list-style-type: none"> <li>» The result of numerous conversations and discussions at the level of the Management Board as well as among executive management and department heads of the voestalpine Group</li> <li>» The Code of Conduct as well as the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, and the core labor standards of the International Labor Organization (ILO)</li> <li>» Available in multiple languages on the intranet and on the website: <a href="https://www.voestalpine.com/compliance/en">https://www.voestalpine.com/compliance/en</a></li> </ul>
	Business Conduct Policy	Own operations	<p>Responsible: Management Board/executive management</p> <p>Monitoring and compliance regulations: Compliance organization</p>	<ul style="list-style-type: none"> <li>» Supplements and fleshes out the Code of Conduct</li> <li>» Available in several languages on the intranet</li> </ul>
	Guideline on dealings with brokers and consultants	Own operations	<p>Responsible: Management Board/executive management</p> <p>Monitoring and compliance regulations: Compliance organization</p>	<ul style="list-style-type: none"> <li>» Supplements and fleshes out the Code of Conduct</li> <li>» Available in several languages on the intranet</li> </ul>

IROs addressed	Policy	Scope of the policy	Responsibility and monitoring	Other comments
Shared values at voestalpine Practiced corporate ethics Violations of compliance guidelines and white-collar crime	Code of Conduct for voestalpine's Lobbyists (Lobbying Code of Conduct)	Own operations External lobbyists	Responsible: Management Board/executive management  Monitoring and compliance regulations: Compliance organization	» The result of numerous conversations and discussions at the level of the Management Board as well as among executive management and department heads of the voestalpine Group  » Available in several languages on the intranet and on the website <a href="https://www.voestalpine.com/compliance/en">https://www.voestalpine.com/compliance/en</a>
	Antitrust Policy	Own operations	Responsible: Management Board/executive management  Monitoring and compliance regulations: Compliance organization	» Supplements and fleshes out the Code of Conduct  » Available in several languages on the intranet
	Guidelines on the compliance violation prevention program	Own operations	Responsible: Management Board/executive management  Monitoring and compliance regulations: Compliance organization	» Supplements and fleshes out the Code of Conduct  » Available in several languages on the intranet
	Compliance Policy Manual	Own operations	Responsible: Management Board/executive management  Monitoring and compliance regulations: Compliance organization	» Supplements and fleshes out the Code of Conduct  » Available in several languages on the intranet
Shared values at voestalpine Practiced corporate ethics	Corporate Governance Code	Voluntary commitment by voestalpine AG	Management Board and Supervisory Board of voestalpine AG	» External regulatory framework with which voestalpine voluntarily complies  » Available on the website: <a href="https://www.corporate-governance.at/kodex/">https://www.corporate-governance.at/kodex/</a>  » For more information, see GOV-1 – G1
Practiced corporate ethics Violations of compliance guidelines and white-collar crime Selection process for suppliers	Due Diligence User Manual	Upstream value chain  Downstream value chain to a partial extent (excl. use by customers, self-pickups)	Procurement board	» Consider stakeholder analysis in policy  » Internal communication to all users

For this chapter, no measurable targets have been defined in the reporting period in accordance with ESRS 2 para. 81b—nevertheless, the company is continuously pursuing the effectiveness of existing activities and policies. The compliance framework is continuously evaluated and, if necessary, adapted to ensure that it meets current requirements and effectively contributes to minimizing risks. Various procedures are used to track the effectiveness of the compliance management system, in particular the independent certification of the compliance management system, audits, and the evaluation of the whistleblower system's acceptance.

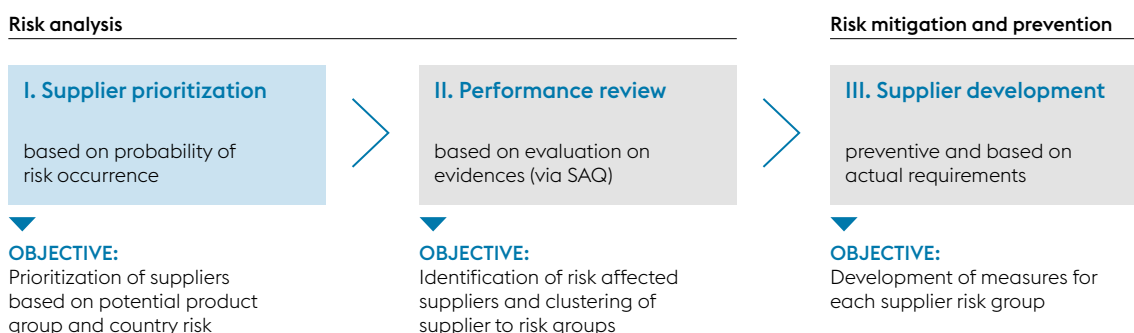
## G1-2 – Management of relationships with suppliers

At voestalpine, procurement is organized in consideration of economic, environmental, and social aspects. It revolves around the central goal of establishing fair relationships with suppliers, including small and medium-sized enterprises (SMEs). Environmental and social criteria are incorporated into the selection process for suppliers.

In order to enhance supply chain management, voestalpine is currently creating the organizational and procedural bases to gradually extend the existing due diligence process—which to date has been limited to companies subject to the Supply Chain Due Diligence Act (LkSG)—to the whole Group. Compliance with human rights and measures to reduce CO<sub>2</sub> emissions are a particular focus in this regard.

As a Group-wide directive, the Due Diligence User Manual governs the due diligence procedures in supply chain management and outlines measures for awarding contracts in procurement. Supply chain management at voestalpine follows a risk-based approach. The identification, assessment, and prioritization of risks is based on the OECD guidelines for fulfilling the due diligence requirements for responsible business conduct. This approach ensures that resources are employed in a targeted manner and that the most important and urgent issues are addressed first. In practice, this risk-based approach is implemented in a three-stage process (see figure below). In the first step, supplier prioritization, any risk exposure of suppliers on the basis of country and product group-specific risks is identified. This analysis and categorization must be carried out every year for all active suppliers, including those that were added as new suppliers in the year in question. In the second step, performance review measures are conducted for all suppliers previously classified as high or medium risk, in order to understand their individual sustainability performance and specify the actual risks. The third step aims to achieve continuous supplier development to improve their sustainability performance and awareness of their responsibility with regard to human rights and the environment, and ultimately to avoid and mitigate risks. Here too, action is based on the actual requirements.

### RISK-BASED APPROACH FOR SUSTAINABLE SUPPLIER MANAGEMENT



The analysis of product group-specific risks focuses on product groups that are purchased on a regular basis by voestalpine and that are associated with potential sustainability risks. Sustainability risks are defined as potential violations of laws and guidelines on human rights and environmental protection (see table below). This also includes the risk of potential violations of human and labor rights that may affect workers in the supply chain. These human rights risks are at the heart of the analysis and are summarized in the table below.

## RELEVANT TOPICS FOR RISK ASSESSMENT

<b>Relevant risks in relation to human rights</b>	Human rights risks arising from the characteristics of the industry, its activities, products, and manufacturing processes, including: <ul style="list-style-type: none"> <li>» Child labor</li> <li>» Forced labor</li> <li>» Non-compliance with occupational health and safety</li> <li>» Disregard for freedom of association</li> <li>» Unequal treatment of employees</li> <li>» Failure to pay a reasonable living wage</li> <li>» Deployment of security forces on site when the prohibition of torture or the freedom of association are violated or when life and limb are endangered</li> <li>» Impairment of people's livelihoods through soil contamination, water, and air pollution, general emissions, excessive water consumption, and unlawful displacements, and land confiscation, for example through the establishment of new production facilities</li> </ul>
<b>Relevant environmental risks</b>	Relevant environmental risks include: <ul style="list-style-type: none"> <li>» Use of mercury and treatment of mercury waste</li> <li>» Production and use of persistent organic pollutants (POPs)</li> <li>» Environmentally harmful treatment, collection, storage, and disposal of POP waste</li> <li>» Export and import of hazardous substances</li> <li>» Other risks that need to be taken into account due to regulatory requirements (e.g., the EU Supply Chain Directive) include CO<sub>2</sub> emissions</li> </ul>

The country-specific risk assessment is carried out using public indices that encompass governance and sustainability. Two widely available sources are used by voestalpine to this end: the Worldwide Governance Indicators (source: World Bank) and the CSR Risk Check (source: MVO Nederland). A total of 213 countries and territories are covered by these indices. The combination of the two indices results in an overall risk assessment for each country and region. The following table shows the result of this risk assessment in the business year 2024/25. The data was based on all active suppliers in the business year. Internal value-added orders were not taken into account.

## OUTCOME OF THE RISK ASSESSMENT 2024/25

<b>Vulnerable suppliers</b>	<b>Percentage of total suppliers (%)</b>
Suppliers from potentially at-risk product groups	19.0
Suppliers from potentially at-risk countries	13.0
Suppliers from potentially at-risk product groups in potentially at-risk countries	3.0

To ensure financial stability in supply chain—especially for SMEs—voestalpine relies on clear payment terms, digital payment monitoring systems, and automated payment reminders. Regular training courses for involved employees support the timely processing of payments. These actions aim to strengthen transparency in procurement, provide financial security for suppliers, and promote environmental and corporate social responsibility along the supply chain.

For more information on human rights compliance and related actions, see chapter S2.

### G1-3 – Prevention and detection of corruption and bribery

Design to prevent corruption and bribery, voestalpine's compliance management system is based on the following pillars:

- » **Risk analysis:** Identification of compliance risks within the Group through continuous analysis of potential compliance risk areas.
- » **Prevention:** For purposes of prevention, the Group undertakes activities to ensure ethics-based management and to raise awareness, which includes putting measures in place to monitor adherence to the Group's compliance rules. These include but are not limited to communications activities, training programs, and educational events as well as elements of the internal control system.
- » **Detection:** In order to identify compliance violations, in addition to the various reporting channels the Group has instituted—in particular the whistleblower system—investigations and audits, as circumstances warrant.
- » **Response:** Whenever it has identified compliance violations, the Group takes precautions to avert further compliance violations (e.g., by imposing additional oversight measures, educational events, and training programs).
- » **Sanction:** When compliance violations occur, appropriate sanctions are imposed. These include consequences under employment law, filing charges with the appropriate authorities, terminating contracts with third parties, etc.

The Compliance organization at voestalpine is responsible for investigating cases of suspected corruption (more information on the Compliance organization can be found in chapter G1-1 under "Responsibility and Compliance Organization"). As the highest authority in the Compliance organization, the Group Compliance Officer reports directly to the Chairman of the Management Board. The Officer ensure reports are handled in an objective and timely manner. The members of the administrative, management, and supervisory bodies address the topic of corruption and bribery at meetings of the Management Board and Supervisory Board, as well as in committees of the Supervisory Board as circumstances require.

Once a year, the Group Compliance Officer also prepares a summary compliance report that includes at least the following points:

- » Type and extent of compliance incidences that have been the subject of reports and investigations
- » Status of any pending administrative or judicial proceedings related to compliance incidents
- » Educational events, training programs, and communications measures carried out
- » Sanctions imposed

The annual compliance report is submitted to the Management Board and Supervisory Board of voestalpine AG In addition, reporting to the Management Board and Supervisory Board is carried out on an ad hoc basis.

#### PREVENTIVE ACTIVITIES

As part of its compliance management, voestalpine places particular importance on preventive activities. These include, in particular, training, management meetings, and ongoing information initiatives. Compliance is therefore a recurring theme, particularly at the major employee events at

Group and divisional level, but also for top management. This focus on compliance ensures that the policies are accessible and that the impacts are understood by employees. Similarly, successful independent certification of the compliance management system during the reporting period (see G1-1) also helps to raise awareness of compliance issues and contributes to the continuous improvement of compliance processes. It also promotes employee awareness and highlights the importance of adhering to Group-wide compliance standards.

Employees learn how to deal with issues that include invitations, gifts, and potential conflicts of interest in periodic training courses, training sessions, and management meetings on the topic of business ethics (compliance training). Employees are also trained in dealing with business intermediaries.

Since 2009, the voestalpine Group has been using mandatory e-learning courses to raise awareness on the topic of compliance among its employees. This e-learning curriculum is currently available in 14 languages and has been repeatedly revised and expanded over time. In addition to the learning units, the courses also present case studies and require a final test.

#### KEY E-LEARNING TOPIC: “COMPLIANCE BASICS”

Participants: all employees

What is Compliance?	Compliance at voestalpine incl. whistleblower system	Day-to-day compliance	Consequences of violations	Case studies and final test
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#### KEY E-LEARNING TOPIC: “FAIR COMPETITION”

Participants: executives as well as employees in high-risk functions

Overview of antitrust law	Legal basics and consequences	Collusion between competitors	Collusion between suppliers and buyers	Case study: Sharing market information	Final test
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#### KEY E-LEARNING TOPIC: “RECAP—FAIR COMPETITION”

Participants: executives as well as employees in high-risk functions

Collusion between competitors	Abuse of market position	Case study: Pricing policies	Case study: Sales prices
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#### KEY E-LEARNING TOPIC: “PROTECTION AGAINST CORRUPTION”

Participants: all employees

Code of Conduct, contact persons, and whistleblowing	What is corruption?	Legal basics and consequences	Favors and payments	Final test
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Certain groups, such as employees in procurement, sales, and senior executives, are at higher risk of corruption and bribery. In addition, voestalpine operates in countries where there is generally a higher risk of corruption. Alongside the e-learning courses, mandatory target group-oriented classroom-based and online training courses are therefore carried out throughout the Group, especially for employees in high-risk roles such as sales or procurement. This mandatory training is generally focused on adherence to the law and internal guidelines as well as on the topics of (anti)corruption and antitrust law as it applies to the participants' respective sphere of activity. voestalpine AG employees also need to complete classroom-based training on the topic of compliance with capital market regulations.

Regardless of their function, all new employees of a Group company must complete the e-learning course "Compliance basics." Compliance training is also mandatory for young executives. Four face-to-face training courses were held in the 2025/26 business year (2024/25: five) as part of the value:program management training program, each of which was attended by up to 40 people.

The following tables provide an overview of the level of compliance training that was completed by employees, executives, and the managing directors of voestalpine in 2025/26. Of the 5,820 training courses assigned, in particular for high-risk functions (antitrust law, antitrust law refresher course as well as compliance and anti-corruption training), around 94.59% were successfully completed in the reporting period. Of the 315 (= 5.41%) training courses not yet completed, only around 35% are overdue, while around 65% are still within the scheduled completion period.

#### NUMBER OF PARTICIPANTS IN E-LEARNING COURSES (COMPLETED TRAINING)

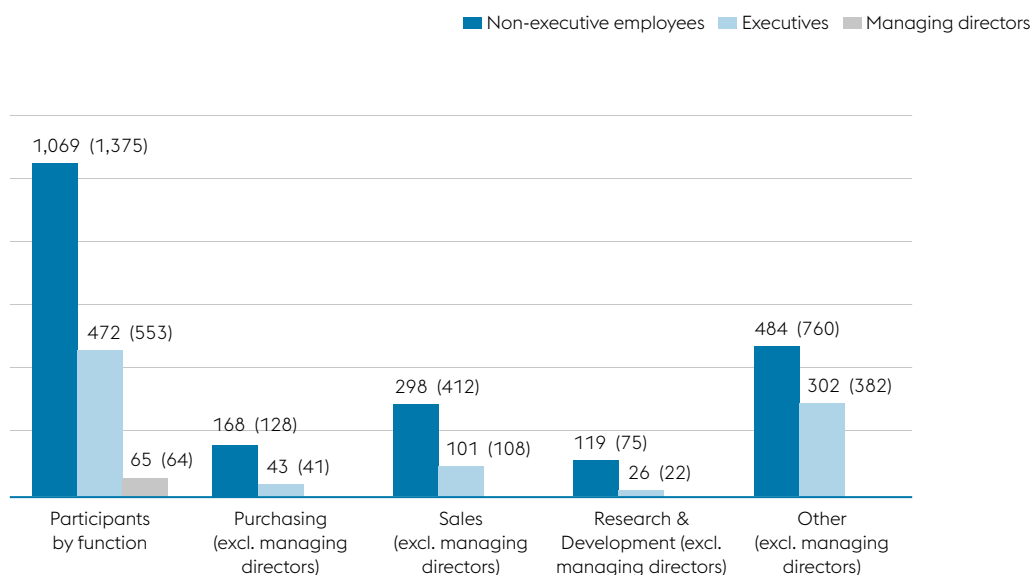
	Total participants		Employees		Managers		Managing directors	
	2024/25	2025/26	2024/25	2025/26	2024/25	2025/26	2024/25	2025/26
Compliance basics	2,074	1,676	1,862	1,505	197	159	15	12
Antitrust law	695	486	575	400	100	81	20	5
Antitrust law refresher course	1,204	1,702	892	1,189	239	427	73	86
Protection against corruption	2,774	1,641	2,331	1,483	359	149	84	9

#### NUMBER OF PARTICIPANTS FACE-TO-FACE TRAINING

	Number of training courses		Participants	
	2024/25	2025/26	2024/25	2025/26
value:program	5	4	170	141
purchasing power academy	3	5	33	48
Compliance in general	64	52	1,789	1,417
<b>Overall</b>	<b>72</b>	<b>61</b>	<b>1,992</b>	<b>1,606</b>

## FACE-TO-FACE TRAINING: 1,606 PARTICIPANTS IN THE BUSINESS YEAR 2025/26

Participants by (at-risk) function and sector (previous year's figures in brackets)



The training program outlined here covers all functions across the Group (100%) that have been identified as at-risk in a risk analysis.

### METRICS AND TARGETS

#### G1-4 – Confirmed incidents of corruption and bribery

There were no convictions or fines for violations of anti-corruption and anti-bribery laws during the reporting period. This also continues to apply to the case of the accounting errors identified at a German Group company in the Metal Forming Division, as set out under this heading in the 2024/25 consolidated non-financial statement. Accordingly, no incident-related measures had to be taken to address such violations. More information on preventive actions can be found in chapter G1-3.

### OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the assumptions and methodology	Information on sources of a high level of measurement uncertainty and information on measurement
G1-3 – Prevention and detection of corruption and bribery	21b	Percentage of functions-at-risk covered by training programs	At-risk functions: In particular employees in procurement or sales as well as managers	Recording primary data
G1-4 Confirmed incidents of corruption and bribery	24a	The number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws	Documented based on reporting structure in the compliance organization	Recording primary data

## TAXES

As an international corporate group, it is essential for voestalpine to ensure consistent compliance with the tax legislation applicable in all countries in which it operates. In addition to the ESRS reporting requirements, voestalpine voluntarily publishes information on its tax strategy and tax payments. This section of the report is based on the generally accepted sustainability reporting standards of the Global Reporting Initiative (GRI), specifically GRI-207.

The Group Tax Strategy, which the Management Board of voestalpine adopted as part of the Group Tax Guideline, represents the voestalpine Group's commitment to comply with the tax rules and regulations applicable in a given country in connection with all of its business activities and decisions.

The key principles governing the Group's tax strategy are as follows:

» **Tax policy:**

As part of its global strategy, the voestalpine Group pursues the goal of minimizing its total costs. This is why tax election options are utilized to the extent allowed by law in order to lower the Group's tax liabilities unless doing so adversely affects the Group's business. In any case, the Group's tax policies are designed to comply with tax law.

» **Corporate responsibility:**

The voestalpine Group pays taxes wherever it generates value added. Transfer pricing within the Group is based on the OECD Transfer Pricing Guidelines. Transfer prices are not used to design tax policy.

» **Relationships with government agencies:**

The voestalpine Group fulfills all cooperation duties under tax law. In particular, it complies with all tax-related retention and recording requirements, whether temporal or geographical. The voestalpine Group collaborates proactively in the processes associated with assessments of new laws within the institutions established for that purpose.

Each Group company's executive management is responsible for implementing and complying with tax rules and regulations as well as the Group Tax Guideline. voestalpine AG and its divisions' lead companies regularly review and update the Group Tax Guideline and monitor implementation thereof and compliance therewith in the Group companies. The functional responsibility for these activities at the Management Board level rests with the Chief Financial Officer of voestalpine AG. To ensure compliance with the Group Tax Strategy, steering processes and monitoring measures were developed for voestalpine AG and the divisions' lead companies regarding the key tax processes in the Group companies that are integral to the Group Tax Guideline.

Furthermore, appropriate activities were undertaken to ensure compliance with the Group Tax Guideline in the long term. Among other things, this includes reviews of employees' qualifications, clear job descriptions, regular sharing of information related to task-specific matters, and employee training.

The Group companies, the divisions' lead companies, and voestalpine AG exchange information on an ongoing basis in order to identify tax risks early on. Discussions within Controlling are carried out to this end on a regular basis, with the aim of monitoring the implementation of activities related to material tax issues. Changes in tax legislation or modifications of business models are coordinated with the divisions' lead companies. The given Group company analyzes the effects thereof and develops suitable activities based thereon, as necessary in collaboration with the division's lead company or voestalpine AG.

If a Group company realizes that a tax return or tax declaration previously filed with the tax authorities is incorrect or incomplete, this Group company must immediately notify the relevant tax authority of this in accordance with national statutory requirements and must make the necessary adjustments. The respective division's lead company or the Group tax department are notified if such tax offenses are discovered, and activities are defined to fix and/or eliminate problems of this nature. Group companies are required to engage an external tax consultant in order to obtain their assessment of material facts and thus to mitigate any tax risks. The annual tax returns are submitted to a critical audit by an external tax consultant at minimum before being submitted to the tax authorities. In general, each Group company meets with an external tax consultant at least once a year to cover important issues. Since October 1, 2017, KPMG has been acting as a global tax partner in the role of external tax consultant.

Any concerns regarding unethical or unlawful conduct may be reported using the Web-based whistleblower system. This system is also available for stakeholders to report their concerns.

#### **COUNTRY-BY-COUNTRY REPORTING**

As the multinational Group's parent company with consolidated revenue in excess of EUR 750 million, voestalpine AG annually submits a Country-by-Country Report to the appropriate Austrian tax authority.

See the chapter Investments in the Consolidated Financial Statements for Group companies' names and domiciles. The country-specific disclosures in the Country-by-Country Report (see following table) concern entities that are included in the Consolidated Financial Statements by virtue of being fully consolidated (see the "Investments" annex following the notes to the Consolidated Financial Statements). Hence information on entities measured at equity (classified as "KEA" or "KEG" in the aforementioned chapter) as well as on unconsolidated entities (K0) is not included in this report. The data concerns the period from April 1, 2025, through March 31, 2026 (and the prior period from April 1, 2024, through March 31, 2025)

## TAXES: COUNTRY-BY-COUNTRY REPORTING 2025/26

Amounts in EUR thousands

Tax jurisdiction	Main activity	Number of employees <sup>1</sup>	Revenue from third-party transactions <sup>2</sup>	Revenue from intra-Group transactions with other tax jurisdictions <sup>3</sup>	Profit before tax <sup>4,9</sup>	Property, plant, and equipment <sup>5</sup>	Income tax paid <sup>6</sup>	Tax expense incurred <sup>7</sup>	Reasons for the difference between the tax incurred and the tax expense determined by application of the standard tax rate on the profit before tax <sup>8</sup>
ARE	Sales	26	50,641	40	1,171	177	114	76	
ARG	Sales	65	11,748	0	319	858	0	0	
AUS	Production, sales	281	123,373	57	5,418	21,280	1,749	1,681	
AUT	Production, sales, services	23,172	8,186,027	1,777,575	1,703,192	4,741,818	31,640	67,033	a), b), f)
BEL	Production	651	238,083	41,480	23,246	70,311	5,510	5,299	b), f)
BGR	Production	96	4,691	6,867	652	3,700	47	32	
BRA	Production	2,333	384,547	58,796	1,067	126,293	1,324	3,602	c), f)
CAN	Production, sales	281	98,845	1,947	-5,296	19,449	486	571	c), f)
CHE	Sales	118	75,068	2,003	-6,149	15,322	131	8	f)
CHN <sup>10</sup>	Production, sales	2,105	590,497	11,296	52,472	147,854	11,584	13,423	
COL	Sales	70	6,268	153	-358	2,425	-110	0	
CZE	Production, sales	350	57,402	57,270	6,324	32,812	1,135	1,374	
DEU	Production, sales	5,766	1,428,393	390,445	73,018	441,449	11,186	6,919	a), b), c), d), f)
DNK	Sales	12	8,147	88	455	400	138	120	
ECU	Sales	33	2,912	0	-197	616	45	0	
EGY	Production, sales	88	13,482	0	797	3,969	308	529	
ESP	Production, sales	292	111,765	16,451	3,348	19,092	780	767	
FIN	Sales	6	6,472	13	-98	996	-89	0	
FRA	Production, sales	853	272,337	21,654	5,276	65,727	1,277	1,798	
GBR	Production, sales	660	245,486	7,088	31,669	40,455	2,187	3,874	a), b), c), e), f)
GRC	Sales	6	2,889	0	-85	92	0	0	
HUN	Production, sales	262	47,443	6,247	4,554	11,447	890	1,002	
IDN	Production, sales	172	7,350	13,422	385	2,646	290	183	
IND	Production, sales	1,017	107,060	9,055	5,182	24,956	1,524	1,393	
ITA	Production, sales	777	247,823	58,959	10,817	101,984	914	2,104	a), b)
JPN	Sales	77	26,078	459	277	4,845	-100	152	
KOR	Sales	49	9,616	14	-229	3,197	7	1	
LTU	Production	78	11,532	5,688	1,130	3,263	273	223	
LVA	Production	7	3,368	148	-57	221	0	0	
MEX	Production, sales	621	68,743	14,892	1,304	22,678	936	887	
MYS	Sales	57	5,666	122	-79	4,196	-42	0	

Amounts in EUR thousands

Tax jurisdiction	Main activity	Number of employees <sup>1</sup>	Revenue from third-party transactions <sup>2</sup>	Revenue from intra-Group transactions with other tax jurisdictions <sup>3</sup>	Profit before tax <sup>4,9</sup>	Property, plant, and equipment <sup>5</sup>	Income tax paid <sup>6</sup>	Tax expense incurred <sup>7</sup>	Reasons for the difference between the tax incurred and the tax expense determined by application of the standard tax rate on the profit before tax <sup>8</sup>
NLD	Production, sales	1,256	564,724	10,519	-2,738	118,506	7,623	7,134	a), b), f)
NOR	Sales	2	3,763	5	360	22	1,597	82	
PER	Sales	86	9,296	0	672	1,652	238	181	
POL	Production, sales	974	304,390	12,557	9,403	54,421	1,471	1,926	
PRT	Production	43	2,258	530	247	1,176	26	26	
ROU	Production, sales	915	250,585	20,420	26,341	39,558	3,891	3,987	
RUS	Sales	0	0	0	-124	0	0	0	
SAU	Production	64	5,764	52	160	2,551	214	112	
SGP	Sales	141	64,405	163,548	-12,622	9,228	982	982	a), b), c), f)
SVK	Sales	24	5,488	1	478	831	160	116	
SWE	Production, sales	1,082	81,397	258,004	-4,559	139,487	2,638	671	a), b), f)
THA	Production, sales	123	22,376	4	803	3,432	35	192	
TUR	Production, sales	268	54,604	10,676	-2,454	4,173	482	796	b), f)
TWN	Sales	109	9,628	1,207	1,255	5,290	99	234	
USA	Production, sales	2,773	1,146,958	29,398	-31,172	273,426	445	536	a), b), c), f)
VNM	Sales	64	3,674	11	-128	1,391	0	0	
ZAF	Production, sales	471	80,080	0	11,380	19,061	1,895	1,386	a), d), f)

<sup>1</sup> The "Number of employees" metric refers to the total number of employees in all business units within a tax jurisdiction. The number of employees is based on full-time equivalents (FTE).

The number of employees refers to the status as of the end of the respective business year.

<sup>2</sup> The "Revenue" metric concerns the total revenue generated by all business units within a tax jurisdiction. There are no deviations from the revenue shown in the Consolidated Financial Statements.

<sup>3</sup> This metric includes revenue from intra-Group transactions of all business units within a tax jurisdiction with those in other tax jurisdictions.

<sup>4</sup> The "Profit before tax" metric concerns the total profit before tax of all business units within a tax jurisdiction. Deviations from the Consolidated Financial Statements arise, in particular, from the fact that the metric contains figures added country by country, whereas the Consolidated Financial Statements contain consolidated figures.

<sup>5</sup> The "Property, plant, and equipment" metric equates to the net carrying amount of all property, plant, and equipment belonging to the business units within a tax jurisdiction as of the end of the respective business year. There are no deviations from the property, plant, and equipment shown in the Consolidated Financial Statements.

<sup>6</sup> The metric referring to the income tax paid concerns the total income tax paid by all business units within a tax jurisdiction.

<sup>7</sup> The metric referring to the income tax incurred concerns the total of all income taxes of all business units within a tax jurisdiction, excluding deferred taxes and provisions for uncertain tax items.

<sup>8</sup> An expected tax expense may be determined based on the regular tax rate applicable to the "Profit before tax" metric. Temporary and permanent differences may result in variances between the actual tax expense and the expected tax expense. Key differences between the actual tax expense and the expected tax expense in individual countries arise from:

a) Tax-exempt income (e.g., investment income)

b) Non-deductible expenses

c) The GRI metric "Profit before tax" includes the total of all earnings of all business units, but the tax assessment is carried out by business unit (with no offsetting of all subsidiaries' gains and losses).

d) Special tax assessment regime/tax incentives

e) Use of tax loss carryforwards and/or carrybacks

f) Temporary and permanent differences

<sup>9</sup> This metric contains a large percentage of tax-exempt investment income, in part multi-level, especially in Austria.

<sup>10</sup> For reasons of materiality, HKG is not presented separately.

## TAXES: COUNTRY-BY-COUNTRY REPORTING 2024/25 (PREVIOUS YEAR)

Amounts in EUR thousands

Tax jurisdiction	Main activity	Number of employees <sup>1</sup>	Revenue from third-party transactions <sup>2</sup>	Revenue from intra-Group transactions with other tax jurisdictions <sup>3</sup>	Profit before tax <sup>4,9</sup>	Property, plant, and equipment <sup>5</sup>	Income tax paid <sup>6</sup>	Tax expense incurred <sup>7</sup>	Reasons for the difference between the tax incurred and the tax expense determined by application of the standard tax rate on the profit before tax <sup>8</sup>
ARE	Sales	23	53,827	3	1,682	279	1	146	
ARG	Sales	68	20,889	0	1,281	841	1,935	0	f)
AUS	Production, sales	318	135,324	65	8,999	17,204	2,451	2,469	
AUT	Production, sales, services	23,280	8,272,485	1,638,299	1,162,772	4,463,441	139,956	-8,652	a), b), f)
BEL	Production	639	236,159	40,973	22,378	63,188	4,891	5,115	
BGR	Production	110	11,139	3,996	1,442	3,866	172	172	
BRA	Production	2,535	451,483	59,302	9,892	113,181	5,923	4,904	a), c), f)
CAN	Production, sales	246	98,069	3,926	-8,914	20,529	70	82	
CHE	Sales	122	79,909	2,280	-2,425	16,499	262	-46	
CHN	Production, sales	2,229	640,541	10,972	63,635	161,827	13,896	13,942	a), b), d)
COL	Sales	69	6,872	52	-369	1,945	177	0	
CZE	Production, sales	371	58,760	56,734	6,280	33,766	825	1,251	
DEU	Production, sales	6,237	1,698,330	439,715	-478,776	468,779	12,200	1,045	c), f)
DNK	Sales	12	8,281	191	718	554	119	152	
ECU	Sales	35	3,460	0	62	713	57	43	
EGY	Production	53	9,950	0	867	2,391	14	379	
ESP	Production, sales	295	108,399	16,502	4,976	19,035	676	622	
FIN	Sales	8	8,488	5	283	1,174	1	30	
FRA	Production, sales	857	254,379	19,760	6,158	68,169	-227	1,291	
GBR	Production, sales	699	289,307	4,368	50,714	42,035	6,304	4,071	a), c), f)
GRC	Sales	6	3,981	0	-54	105	0	0	
HKG	Sales	4	1,323	31	-727	46	0	0	
HUN	Production, sales	281	49,378	5,813	3,730	11,403	1,352	863	
IDN	Production, sales	177	9,509	14,283	245	3,224	430	274	
IND	Production, sales	923	117,625	7,382	6,700	28,965	1,962	1,928	
ITA	Production, sales	699	256,028	44,939	8,812	99,395	1,519	1,699	
JPN	Sales	84	26,427	148	211	5,975	402	33	
KOR	Sales	49	10,243	199	45	3,740	14	14	
LTU	Production	79	10,498	8,782	1,518	3,543	257	220	
LVA	Production	6	7,794	60	132	186	0	0	
MEX	Production	633	72,640	15,661	3,094	25,079	2,304	2,585	a), b), c), f)
MYS	Sales	61	5,233	25	-508	4,307	-7	0	

Amounts in EUR thousands

Tax jurisdiction	Main activity	Number of employees <sup>1</sup>	Revenue from third-party transactions <sup>2</sup>	Revenue from intra-Group transactions with other tax jurisdictions <sup>3</sup>	Profit before tax <sup>4,9</sup>	Property, plant, and equipment <sup>5</sup>	Income tax paid <sup>6</sup>	Tax expense incurred <sup>7</sup>	Reasons for the difference between the tax incurred and the tax expense determined by application of the standard tax rate on the profit before tax <sup>8</sup>
NLD	Production, sales	1,181	532,649	14,529	57,796	123,688	6,568	6,679	a)
NOR	Sales	2	2,281	3	268	19	151	52	
PER	Sales	88	10,246	0	949	1,826	230	288	
POL	Production, sales	914	306,389	6,143	8,018	54,963	1,647	1,663	
PRT	Production	40	1,546	318	-302	1,321	10	10	
ROU	Production, sales	903	225,389	19,156	29,015	43,387	5,110	3,799	a), b)
RUS	Sales	3	40	0	-616	349	-222	-106	
SAU	Production	64	9,920	0	1,788	2,916	80	257	
SGP	Sales	148	73,898	188,756	-1,793	9,519	1,082	869	a), b), e)
SVK	Sales	25	5,954	1	829	878	270	172	
SWE	Production, sales	1,167	82,079	279,138	20,083	145,102	4,348	3,860	
THA	Production, sales	123	21,758	56	71	4,072	-1	0	
TUR	Production, sales	283	39,142	8,258	-4,755	4,776	341	420	
TWN	Sales	106	8,999	797	1,063	3,390	188	149	
USA	Production, sales	2,864	1,291,495	32,102	43,754	262,172	-399	1,627	a), b), e), f)
VNM	Sales	66	3,678	0	-110	1,615	0	0	
ZAF	Production	474	111,495	0	11,579	20,900	1,322	1,515	a), e)

<sup>1</sup> The "Number of employees" metric refers to the total number of employees in all business units within a tax jurisdiction. The number of employees is based on full-time equivalents (FTE). The number of employees refers to the status as of the end of the respective business year.

<sup>2</sup> The "Revenue" metric concerns the total revenue generated by all business units within a tax jurisdiction. There are no deviations from the revenue shown in the Consolidated Financial Statements.

<sup>3</sup> This metric includes revenue from intra-Group transactions of all business units within a tax jurisdiction with those in other tax jurisdictions.

<sup>4</sup> The "Profit before tax" metric concerns the total profit before tax of all business units within a tax jurisdiction. Deviations from the Consolidated Financial Statements arise, in particular, from the fact that the metric contains figures added country by country, whereas the Consolidated Financial Statements contain consolidated figures.

<sup>5</sup> The "Property, plant, and equipment" metric equates to the net carrying amount of all property, plant, and equipment belonging to the business units within a tax jurisdiction as of the end of the respective business year. There are no deviations from the property, plant, and equipment shown in the Consolidated Financial Statements.

<sup>6</sup> The metric referring to the income tax paid concerns the total income tax paid by all business units within a tax jurisdiction.

<sup>7</sup> The metric referring to the income tax incurred concerns the total of all income taxes of all business units within a tax jurisdiction, excluding deferred taxes and provisions for uncertain tax items.

<sup>8</sup> An expected tax expense may be determined based on the regular tax rate applicable to the "Profit before tax" metric. Temporary differences and effects from prior periods may result in differences between the actual tax expense and the expected tax expense. Key differences between the actual tax expense and the expected tax expense in individual countries arise from:

- a) Tax-exempt income (e.g., investment income)
- b) Non-deductible expenses
- c) Profit before tax includes the total of all earnings of all business units, but the tax assessment is carried out by business unit (with no offsetting of all subsidiaries' gains and losses, with the exception of Austria and the US).
- d) Special tax assessment regime/tax incentives
- e) Use of tax loss carryforwards and/or carrybacks
- f) Temporary differences and effects from prior periods

<sup>9</sup> This metric contains a large percentage of tax-exempt investment income, in part multi-level, especially in Austria.

Linz, May 26, 2026

The Management Board

Herbert Eibensteiner

Franz Kainersdorfer

Gerald Mayer

Reinhard Nöbauer

Carola Richter

Hubert Zajicek

# CONSOLIDATED FINANCIAL STATEMENTS

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