RWH
RUDOLF WEINBERGER HOLDING GmbH

Consolidated Sustainability Report 2025

Rudolf Weinberger Holding GmbH

Contents

1 General Information

1.1 Basis for preparation of the sustainability statement (ESRS 2 BP-1, BP-2)
1.1.1 General conditions and data
1.1.2 Consolidation and reporting boundaries
1.1.3 Time horizons
1.1.4 Data sources
1.1.5 Sources of estimation and outcome uncertainty
1.1.6 Sensitive Information

1.2 Sustainability Strategy & Corporate Governance (ESRS 2 GOV-1 BIS ESRS 2 to GOV-5)
1.2.1 Group structure
1.2.2 Strategy and business model
1.2.3 Organizational integration of sustainability
1.2.4 Sustainability strategy and due diligence
1.2.5 Sustainability program
1.2.6 Risk management and internal control mechanisms for sustainability reporting
1.2.7 Stakeholder management

1.3 Double Materiality Assessment (ESRS 2 IRO-1, IRO-2, SBM-2, SBM-3)
1.3.1 Step 1: Identification of impacts, risks and opportunities
1.3.2 Step 2: Assessment of impacts, risks and opportunities
1.3.3 Step 3: Preliminary decision on materiality
1.3.4 Step 4: Validation with external stakeholders & final decision
1.3.5 Material ESRS topics for 2025
1.3.6 Information on non-material ESRS topics

2 Environment

2.1 E1 – Climate Change
2.1.1 Material IROs (ESRS 2 SBM-3
2.1.2 Interaction with strategy and business model (ESRS 2 SBM-3, GOV-3, E1-1)
2.1.3 Management of material IROs (ESRS IRO-1, E1-2, E1-3)
2.1.4 Targets (ESRS E1-4)
2.1.5 Metrics (ESRS E1-5, E1-6)

2.2 E2 – Pollution
2.2.1 Material IROs (ESRS 2 SBM-3)
2.2.2 Management of material IROs (ESRS 2 SBM-2, IRO-1, E2-1, E2-2)
2.2.3 Targets (ESRS E2-3)
2.2.4 Metrics (ESRS E2-4)

2.3 E5 – Circular Economy
2.3.1 Material IROs (ESRS 2 SBM-3)
2.3.2 Management of material IROs (ESRS 2 SBM-2, IRO-1, E5-1, E5-2)
2.3.3 Targets (ESRS E5-3)
2.3.4 Metrics (ESRS E5-4, E5-5, E5-6)

3 Social

3.1 S1 – Own Workforce
3.1.1 Material IROs (ESRS 2 SBM-3)
3.1.2 Interaction with strategy and business model (ESRS 2 SBM-3)
3.1.3 Involvement of affected stakeholders (ESRS 2 SBM-2, ESRS S1-2)
3.1.4 Management of material IROs (ESRS S1-1, ESRS S1-3, ESRS S1-4)
3.1.5 Targets (ESRS S1-5)
3.1.6 Metrics (ESRS S1-6 to S1-17)

3.2 S2 – Workers In The Value Chain
3.2.1 Material IROs (ESRS 2 SBM-3)
3.2.2 Interaction with strategy and business model (ESRS 2 SBM-3)
3.2.3 Involvement of affected stakeholders (ESRS 2 SBM-2, S2-2)
3.2.4 Management of material IROs (ESRS S2-1)
3.2.5 Targets (ESRS S2-5)

4 Governance

4.1 G1 – Business Conduct
4.1.1 Material IROs (ESRS 2 SBM-3)
4.1.2 Business Conduct and Corporate Culture (ESRS G1-1)
4.1.3 Management of material IROs (ESRS G1-1, G1-2, G1-3, G1-4)
4.1.4 Targets (ESRS G1-1, G1-2, G1-3, G1-4)

Information

ESRS INDEX (ESRS 2 IRO-2)
ESRS 2 – ANNEX B (ESRS 2 IRO-2)
List of Abbreviations and Glossary
Independent Assurance Report
Contact/Imprint

Foreword from RWH Management

At RWH Group, sustainability is considered a key element of our corporate philosophy and an important driver of our long-term success. In increasingly volatile global markets shaped by geopolitical tensions, armed conflicts, sanctions, and fluctuating raw material and energy prices, resilience and forward-looking action are more important than ever. We are committed to navigating these challenges responsibly while continuously strengthening our market position. We are proud of the progress we have made in embedding sustainability into our operations. Key focus areas include maintaining high recycling rates within our products, increasing use of renewable energy, and the ongoing improvement of resource management and energy efficiency across our production processes. A major milestone in 2025 was the calculation of a comprehensive Corporate Carbon Footprint (CCF) in line with recognized standards, providing a transparent and reliable basis for managing and reducing our GHG emissions.

Our ambition is not only to improve our own environmental performance, but to also actively support our customers in achieving their sustainability goals. Through high-quality products, technical expertise, and increasing transparency on ESG-related characteristics, we want to enable our customers to make informed decisions and to achieve their own targets. Customer orientation, product quality, and long-term partnerships remain at the center of our business activities.

At the same time, our employees are a key pillar of our success. We are committed to providing safe working conditions, fostering a culture of respect and integrity, and supporting continuous development across all entities. We also recognize our responsibility along the value chain and are working to further enhance our understanding and management of ESG-related risks in upstream markets. Despite ongoing market uncertainties, we continue to invest in the strategic development of RWH Group. By strengthening our processes, improving data transparency, and integrating sustainability into decision-making, we are building a solid foundation for the future.

We are convinced that sustainability is essential to successfully navigating an environment defined by change and uncertainty. We would like to thank our employees, customers, partners, and all other stakeholders for their continued trust and support on this journey.

Dr. Georg Hemetsberger
RWH Management

RUDOLF WEINBERGER HOLDING GmbH

Consolidated Sustainability Statement 2025

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1 General Information

1.1 Basis for preparation of the consolidated sustainability statement (ESRS 2 BP-1, BP-2)
1.1.1 General conditions and data
1.1.2 Consolidation and reporting boundaries
1.1.3 Time horizons
1.1.4 Data sources
1.1.5 Sources of estimation and outcome uncertainty
1.1.6 Sensitive Information

1.2 Sustainability Strategy & Corporate Governance (ESRS 2 GOV-1 BIS ESRS 2 to GOV-5)
1.2.1 Group structure
1.2.2 Strategy and business model
1.2.3 Organizational integration of sustainability
1.2.4 Sustainability strategy and due diligence
1.2.5 Sustainability program
1.2.6 Risk management and internal control mechanisms for sustainability reporting
1.2.7 Stakeholder management

1.3 Double Materiality Assessment (ESRS 2 IRO-1, IRO-2, SBM-2, SBM-3)
1.3.1 Step 1: Identification of impacts, risks and opportunities
1.3.2 Step 2: Assessment of impacts, risks and opportunities
1.3.3 Step 3: Preliminary decision on materiality
1.3.4 Step 4: Validation with external stakeholders & final decision
1.3.5 Material ESRS topics for 2025
1.3.6 Information on non-material ESRS topics

1.1 Basis for preparation of the consolidated sustainability statement (ESRS 2 BP-1, BP-2)

With the consolidated sustainability statement for 2025, Rudolf Weinberger Holding GmbH provides its stakeholders with information on its corporate development, as well as related measures, objectives, and priorities in the area of sustainability. The reported information covers the period from January 1 to December 31, 2025 and considers impacts, risks and opportunities (IROs) related to RWH Group's own activities as well as to the upstream and downstream value chain, particularly with respect to IROs in ESRS E1, E2, E5, S1, S2 and G1, with the corresponding policies, measures, targets and metrics addressed in detail in the respective thematic chapters of the consolidated sustainability statement. As this consolidated sustainability statement is prepared for the first time in accordance with the European Sustainability Reporting Standards (ESRS), no comparative information for sustainability indicators and metrics following the ESRS is available for previous years. This statement represents a voluntary consolidated sustainability statement in accordance with the European Sustainability Reporting Standards as set out in *Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023,* as amended by *Commission Delegated Regulation (EU) 2025/1416 of 11 July 2025*. Given the voluntary disclosure of this consolidated sustainability statement, it is published separately from the management report (in contrary to the requirements of ESRS 1.110). No information pursuant to Article 8 of EU Taxonomy Regulation (2020/852) (according to ESRS 1.113) is included in this statement because Rudolf Weinberger Holding GmbH and its subsidiaries are not subject to mandatory reporting under Article 8 of EU Taxonomy Regulation. The statement is audited externally on a voluntary basis. Further details on the scope of the voluntary external audit of this consolidated sustainability statement can be found in the *Independent Assurance Report*.

1.1.1 General conditions and data

All disclosure requirements included in the respective main chapters *Environment, Social* and *Governance* have been classified as material according to the Double Materiality Assessment (DMA). The *ESRS Index (ESRS 2 IRO-2)* provides an overview of material disclosure requirements according to the ESRS. Chapter *1.3* provides details on the scope, methodology and limitations of the Group's DMA. The DMA considers both upstream and downstream value chain aspects for identified impacts, risks, and opportunities. Regarding metrics, value chain data is included especially in connection with Scope 3 GHG emissions in E1 (see details in Chapter *2.1.5*).

1.1.2 Consolidation and reporting boundaries

The consolidation of the data is based on the same principles as the annual financial reporting of the RWH Group. The consolidated quantitative ESG data therefore includes the parent company *Rudolf Weinberger Holding GmbH* (hereinafter referred to as "RWH") and its controlled subsidiaries *Eisenwerk Sulzau-Werfen R. & E. Weinberger AG ("ESW")*, Valji *Proizvodnja Valjev in Ulitkov d.o.o.* ("VALJI"), *Donako Sp. Z o.o.* ("DONAKO") and *MCC International, Inc* ("MCC"). Hereinafter, RWH together with all controlled subsidiaries ESW, VALJI, DONAKO and MCC is referred to as "RWH Group" or "Group". All quantitative ESG data is consolidated in accordance with the principles above, unless otherwise stated in the tables or disclosures in the following chapters.

1.1.3 Time horizons

In accordance with ESRS 1, paragraphs 77-81, time horizons for the analysis of Group-related impacts, risks and opportunities were defined as short-term (one year, corresponding to the current reporting year), medium-term (more than one year and up to five years), and long-term (more than five years).

1.1.4 Data sources

The definitions, processes, data sources and responsibilities are documented in the separate *Reporting Manual*, which is considered the standard operating manual for reporting across all entities. Environmental data and metrics are maintained by the respective environmental management departments at each entity, primarily with system support. Data collection is coordinated at entity level by local ESG coordinators (see the description of this role in Chapter *1.2.3*), while overall group-level oversight is managed by RWH ESG & CSR Management. Most internal energy and environmental data is tracked continuously, monthly, or quarterly, while only a small share is collected annually. Emission factors for the Corporate Carbon Footprint (CCF) in accordance with the GHG Protocol are sourced from representative databases (e.g. *ecoinvent*) or, where applicable, derived from contractual documents of the entities (e.g. for calculating market-based Scope 2 GHG emissions). The CCF is updated on a yearly basis using latest versions of emission factors. For some Scope 3 categories, approximate values and assumptions must be applied. Specifically category *3.11 Use of sold products* is subject to a high level of measurement uncertainty as reliable, data driven modelling of usage across all product types is currently not possible (see limitations for each Scope 3 category in Chapter *2.1.5*). Data for E2 regarding substances of concern (SoC) and substances of very high concern (SVHC) is derived from purchasing volumes collected via the entities' ERP systems. Information regarding the chemical composition of the

respective materials and the resulting shares of SoC and SVHC within each material is derived from the respective safety data sheets (SDS) managed in the entities' chemical inventories. Data for resource inflows in E5 is collected via the entities' ERP systems. Depending on the entity, waste quantities in E5 for the reporting period is either derived from entity-specific waste reports obtained from respective national waste platforms or from internal ERP system waste reports. Data on occupational health and safety is collected by the entities' corresponding health and safety officers with support from ERP systems data and consolidated centrally by the RWH ESG & CSR Management. Human resource (HR) metrics are collected via the entities' ERP systems and consolidated centrally by RWH ESG & CSR Management in collaboration with Human Resources (RWH). Compliance figures for RWH Group are systematically tracked by the entities' compliance officers and consolidated by the Chief Compliance Officer (CCO). Specific calculation principles and assumptions for key figures and metrics are additionally documented in the respective metrics chapters. Approximations or estimates are determined to the best of our knowledge and are based on empirical values, industry benchmarks, or comprehensible internal benchmarks. Where possible and reasonable, approximations will gradually be replaced by reliable primary data in subsequent years.

1.1.5 Sources of estimation and outcome uncertainty

Some metrics included in this report are subject to estimation or high levels of measurement uncertainty, primarily due to limited data availability and the subsequent use of proxies and secondary data sources. The most significant metrics in this regard are outlined below by ESRS topic. Further details can be found under Data limitations in the respective metrics chapters.

E1 – Climate Change: For the majority of Scope 3 categories regarding Gross GHG emissions (ESRS E1-6) in 2.1.5, no primary data is currently available, necessitating the use of secondary data, approximations and assumptions. For Scope 3 categories *3.4 Upstream transport* and *3.9 Downstream transport*, billing addresses are partially used as proxies for material origin. For category *3.5 Waste* at MCC, national waste treatment codes must be mapped to EU-equivalent waste codes, resulting in reduced data quality within this category. For category *3.6 Business Travel* at MCC, data on distances travelled is currently unavailable. GHG emissions are therefore estimated using a GHG emissions intensity factor (tCO_2e per € of travel expenditure), calculated based on ESW travel data and applied to MCC's total travel expenses. The highest level of uncertainty exists in category *3.11 Use of sold products*, where reliable data-driven modelling is not possible due to the wide variance in usage scenarios and lack of standardized customer usage documentation. Calculations rely on scenario-based assumptions from internal technical departments. Improving data quality in this category is defined as a qualitative objective under ESRS E1 (see details in Chapter 2.1.4).

E2 – Pollution: Reported quantities of Substances of Concern (SoC) and Substances of Very High Concern (SVHC) in Chapter 2.2.4 are based on goods receipt information derived from local ERP systems and represent procurement volumes rather than actual consumption. The metrics are therefore approximations based on material inflows. The entity MCC is currently excluded due to limited data availability, reducing overall data completeness.

E5 – Circular Economy: Resource inflow quantities are based on goods receipt information derived from local ERP systems, reflecting material purchases rather than actual consumption. The secondary raw material and scrap usage ratio in Chapter 2.3.4 currently covers ESW and VALJI only, as internal scrap tracking at MCC is not yet consistent. As with E2, MCC accounts for approximately 10% of production output and its exclusion is considered to have a limited impact. DONAKO is excluded for methodological reasons, as production scrap is predominantly sold externally and is not regarded as a relevant material input.

S1 – Own workforce, S2 – Workers in the value chain and G1 – Governance: No metrics are subject to a high level of measurement uncertainty within ESRS S1, S2 and G1. Where differences in definitions arise (e.g. for example in the classification of workplace accidents or in payroll-related data across different national jurisdictions), these have been addressed through the establishment of harmonized definitions applied across all entities during the preparation of data collection.

Assessment of future financial risks: The assessment of future financial risks is inherently subject to uncertainty and the assessment of materiality of financial risks within the consolidated sustainability statement currently differs from the assessment applied in the general risk management process and the consolidated financial statement due to existing differences in assessment methodologies, applied time horizons and materiality thresholds, and gross-versus-net risk considerations, which will be progressively harmonized over the coming reporting years. (see also Chapters 1.2.6 and 1.3.2, *Assessment of risks and opportunities*)

1.1.6 Sensitive Information

Certain information required under ESRS 1, paragraphs 105-108 may not be disclosed if it is classified or sensitive, even when it has been identified as material. This includes

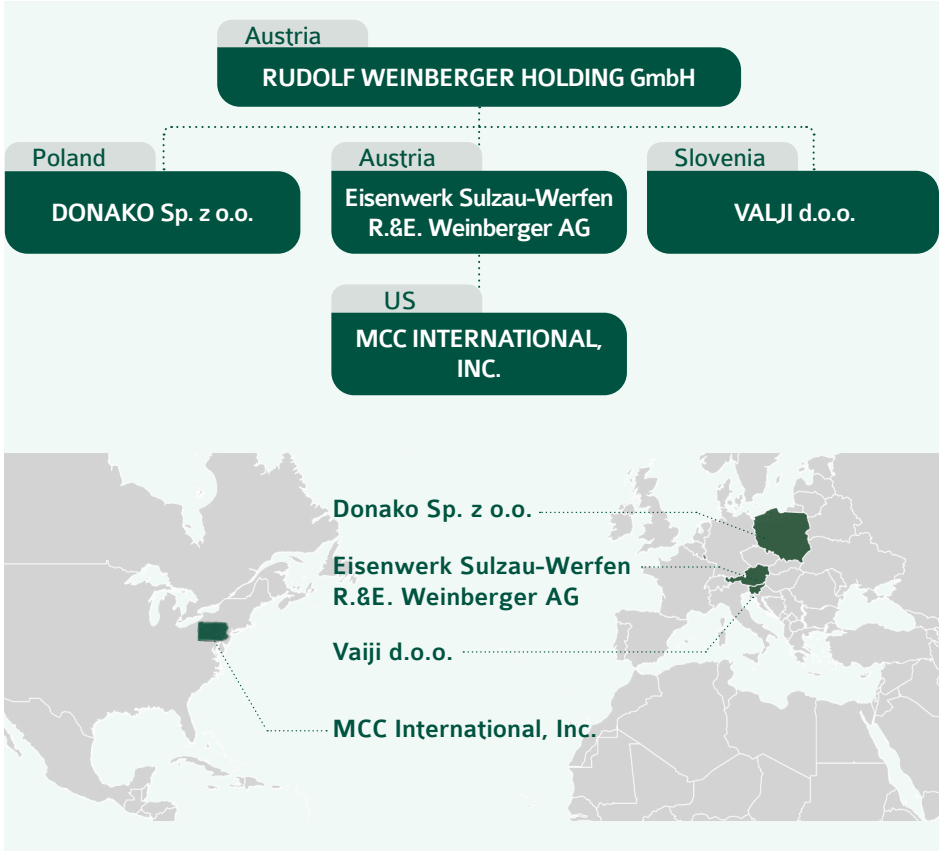
information related to intellectual property, know-how, or results of innovation[1]. Where information is omitted on these grounds, the company continues to meet its disclosure obligations by providing all other relevant information. In such cases, the relevant chapter indicates whether a metric or information is entirely omitted or presented in an alternative format, while ensuring that the overall relevance and context of the disclosure are preserved. In this statement, this applies to the Annual total remuneration ratio (ESRS S1-16), as described in Chapter *3.1.6, Remuneration metrics (pay gap and total remuneration) (S1-16).*

[1] Reasons for not disclosing information: The information is considered confidential as it is not generally known or readily accessible to persons within the relevant business circles, has commercial value due to its confidential nature, and is subject to reasonable steps taken by the undertaking to maintain its secrecy

1.2 Sustainability strategy & corporate governance
(ESRS 2 GOV-1 to GOV-5)

1.2.1 Group structure

RWH, based in Tenneck (Salzburg, Austria), is a group-managing holding company and owns 99.9975% of the shares in ESW, which in turn holds 100% of MCC. RWH also holds 100% of the shares in DONAKO, acquired in 2013, and 100% of the shares in VALJI, acquired in 2020. Each entity operates at a dedicated site, with the exception of RWH. As a holding company, RWH does not operate a separate site but is located at the ESW site in Tenneck.



Consequently, references to RWH and ESW are frequently combined as "ESW/RWH" throughout this report, where appropriate. Unless otherwise stated, the terms "entity" and "site" are therefore used synonymously. In fiscal year 2025, the Group entities generated revenue in the economic sectors (NACE codes) presented in the total net revenue table below. The reported total net revenues represent external revenues, with intercompany revenues eliminated through consolidation.

	NACE codes	Total net revenue (in €)[2]
RWH Group (total)	25.99.0; 27.11.0; 28.91.0	166,410,916
ESW (incl. RWH) (Austria)	28.91.0	99,732,429
DONAKO (Poland)	27.11.0	28,785,660
MCC (US)	28.91.0	16,810,711
VALJI (Slovenia)	25.99.0	21,082,116

1.2.2 Strategy and business model

RWH Group is an international company specializing in the manufacture of high-quality wear parts for a variety of industries. RWH, the Group's managing holding company, provides central administrative and management services for the Group entities. Its sites ESW (Tenneck, Austria) and VALJI (Štore, Slovenia) produce, and supply wear-resistant rolling mill rolls worldwide. These rolls are manufactured using the centrifugal casting process and are delivered ready for installation, serving both as replacement parts for existing rolling mills and as original equipment for new mills. In addition, VALJI produces specialized rolls for plastics, rubber, and profile-processing industries. MCC (McDonald, Pennsylvania/US) manufactures and supplies high-quality, wear-resistant rolling mill rings worldwide, with a particular focus on the US market. These rings are

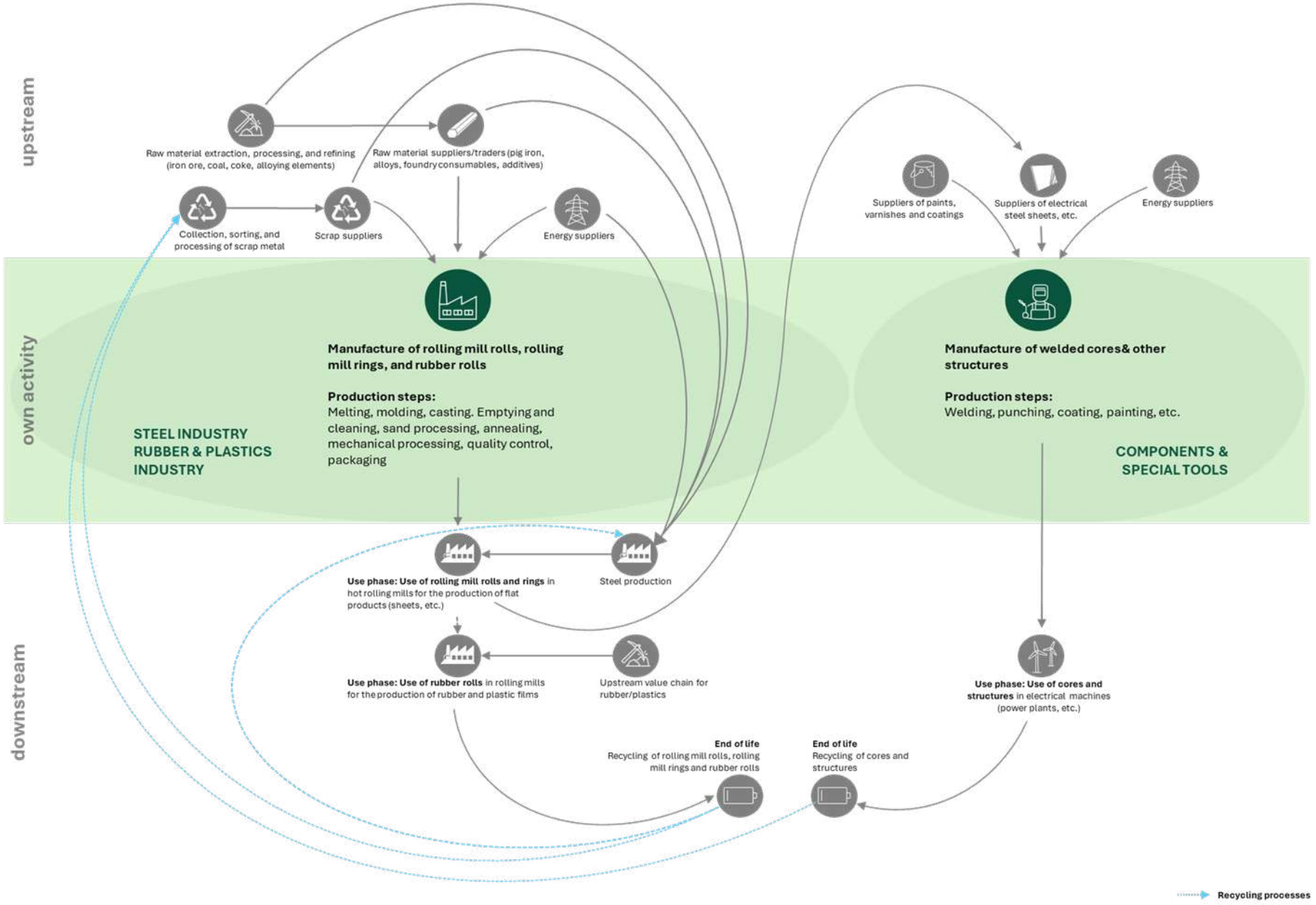
[2] The total net revenues represent external revenues, with intercompany revenues eliminated through consolidation

produced using the vertical centrifugal casting process and are delivered ready for installation. Another key part of RWH Group is DONAKO, a manufacturer of high-quality components and specialized tools for the electrical industry, with extensive experience in processing electromagnetic steel. Based in Wroclaw (Poland) DONAKO punches, cuts, welds, and coats electromagnetic steel sheets, assembling them into rotors and stators for generators and large electric motors. The pre-assembled components are supplied to global manufacturers of hydropower and wind power generators, as well as operators of fossil-fuel power plants. DONAKO's portfolio also includes welded steel constructions and the production of stamping tools. The Group creates value through the development, manufacture and worldwide distribution of high-quality rolling mill rolls and rings for the steel industry to produce hot-rolled flat and long products, as well as through the manufacture of special rolling mill rolls for the plastics and rubber industries. Thanks to innovative material technologies and strict quality controls, the Group guarantees durable and high-performance products for use in rolling mills. The Group's portfolio is further enhanced by the production of the high-quality components and special tools for the electrical industry and the manufacture of stamping tools for the metalworking industry, giving it the advantage of supplying various markets from heavy industry to power generation and thus benefiting from a diversified customer structure. Through innovative product developments, extensive technical support and comprehensive service, the Group tries to contribute to the performance and competitiveness of its international customers.

Value chain of RWH Group and its entities

As illustrated in the figure below, the RWH Group covers several stages of the value chain within the steel industry and related sectors. While the rolling mill rolls and rings production sites (left side of the figure representing ESW, VALJI and MCC) are suppliers for rolling mills and steel producers worldwide, DONAKO (right side of the figure) is positioned further downstream within the value chain and supplies companies in the energy sector.

Key inputs for the entities represent raw materials such as pig iron, steel scrap, alloys, and semi-finished components such as electromagnetic steel sheets and other specialized components. Within roll mill rolls production in particular, secondary raw materials in the form of steel scrap represent an important share of the Group's externally sourced material input stream, with recycled steel scrap constituting a substantial proportion of the input materials used at ESW and VALJI. These secondary inputs are supplemented by internal production scrap generated during the manufacturing and machining processes and the stated primary raw materials such as pig iron and specific alloying elements in order to achieve the required metallurgical properties and product quality standards. Pig iron and selected alloying elements represent strategically important and critical input materials, as maintaining the required product quality standards depends on their availability in specific grades and qualities. In some cases, only a limited number of suppliers are able to meet these requirements. In addition, pig iron, alloys and steel scrap are sourced through international supply chains, which can expose the Group to supply risks. After the service life, the Group's products are closely integrated into circular material flows within the steel industry and are, in most cases, either directly used as secondary input by our customers or traded through the scrap market. A comparable approach applies to the components manufactured by DONAKO. Electrical steel sheets and metallic components processed by DONAKO are generally disassembled and reintegrated into metallic recycling streams after their use phase. For ESW, VALJI and MCC, energy represents another key operational input due to the energy-intensive nature of melting, casting and heat treatment processes. It represents a critical resource primarily due to price volatility rather than limited availability, as energy prices have a significant impact on the economic performance of the Group. Consequently, energy price stability is a key factor with regard to this input. Energy also represents an important operational input for DONAKO, however, overall energy demand at DONAKO is significantly lower compared to the foundry sites due to the less energy-intensive nature of its manufacturing processes (see metrics on energy consumption in Chapter 2.1.5). Managing the balance between product quality, material circularity, energy efficiency and supply chain resilience remains central to the Group's operational strategy.


upstream
own activity
downstream
Raw material extraction, processing, and refining (iron ore, coal, coke, alloying elements)
Raw material suppliers/traders (pig iron, alloys, foundry consumables, additives)
Collection, sorting, and processing of scrap metal
Scrap suppliers
Energy suppliers
Suppliers of paints, varnishes and coatings
Suppliers of electrical steel sheets, etc.
Energy suppliers
Manufacture of rolling mill rolls, rolling mill rings, and rubber rolls
Production steps:
Melting, molding, casting. Emptying and cleaning, sand processing, annealing, mechanical processing, quality control, packaging
STEEL INDUSTRY
RUBBER & PLASTICS INDUSTRY
Manufacture of welded cores& other structures
Production steps:
Welding, punching, coating, painting, etc.
COMPONENTS & SPECIAL TOOLS
Use phase: Use of rolling mill rolls and rings in hot rolling mills for the production of flat products (sheets, etc.)
Steel production
Use phase: Use of rubber rolls in rolling mills for the production of rubber and plastic films
Upstream value chain for rubber/plastics
Use phase: Use of cores and structures in electrical machines (power plants, etc.)
End of life
Recycling of rolling mill rolls, rolling mill rings and rubber rolls
End of life
Recycling of cores and structures
Recycling processes

1.2.3 Organizational integration of sustainability

Sustainable business practices form an important element of RWH Group's corporate identity. Strategic objectives are systematically translated into business processes through decentralized ESG responsibilities, combined with central strategic oversight and coordination by the RWH ESG & CSR Management and the involvement of relevant Group and entity departments. Implementation is supported by targets and measurable key performance indicators (KPIs), which are integrated across the Group to ensure effective monitoring and continuous improvement.

Supervisory Board: As the highest supervisory body, the RWH Supervisory Board oversees the companies' activities regarding ESG areas of the Group. Its role is supervisory and advisory, and it oversees the implementation of ESG strategies developed by RWH Management and RWH ESG & CSR Management, while overall responsibility for sustainability within the Group lies with RWH Management. The Supervisory Board of the Group, as of 2025, consists of eight members. Two members were delegated by the ESW Works Council and two of the eight members (25%) are considered independent in accordance with the *Austrian Corporate Governance Codex, Annex I*. The Supervisory Board has an exclusive supervisory function and no executive responsibilities. In 2025, four ordinary Supervisory Board meetings were held. The board members bring diverse professional experience and competencies, including C-level management, legal and corporate governance, human resources and change management, accounting and auditing, capital markets, and financing, as well as extensive knowledge of the steel sector and related industries (e.g., the automotive sector). Based on this management experience, practical knowledge of sustainability aspects relevant for material impacts, risks and opportunities of the Group (e.g. resource management and energy efficiency) is covered through board member's expertise. At present, there is no formal process to assess the availability or development of specialist expertise concerning the material impacts, risks and opportunities (IROs) identified in the Group's DMA. The Supervisory Board is regularly informed about ongoing sustainability activities and projects, as well as significant regulatory developments and changes in the sustainability-related framework conditions. The Supervisory Board also receives updates regarding sustainability targets, measures and progress related to the implementation of the sustainability strategy during Supervisory Board meetings for internal control purposes. RWH Management provides these updates based on prior briefings prepared by RWH ESG & CSR Management. No additional internal controls have currently been implemented for the RWH Supervisory Board regarding the management of material IROs. During the reporting year, the Managing Board and Supervisory Board addressed sustainability reporting in accordance with Delegated Act (EU) 2023/2772 and its external audit, new legal requirements such as those relating to energy and emissions, product-specific opportunities and challenges, GHG emissions calculation results (CCF), ESG ratings including *EcoVadis*, as well as risks and challenges related to tariffs, raw material and energy prices, supply chain risks and other relevant factors.

Supervisory Board members

Name	Registered on:	Ordinary	Independent
Mag. Rudolf Weinberger (Chairman of the Supervisory Board)[3]	30.03.2018	Yes	-
Franziskus Weinberger, MIM (Deputy Chairman of the Supervisory Board)	22.04.2023	Yes	-
Hubertus Weinberger, MBA	22.04.2023	Yes	-
Mag. Cecily de Potesta	19.10.2023	Yes	-
DI Walter Mayer	07.07.2022	Yes	Yes
Dr. Rupert Wolff	31.12.2024	Yes	Yes

Supervisory Board members delegated by the Works Council[4]:

Name	Delegated on:	Ordinary	Extraordinary
Reinhold Zwerschina	30.03.2018	Yes	-
Harald Schwaiger	14.09.2023	Yes	-

Composition by gender in %

	Male	Female
Supervisory Board members	87.5%	12.5%

Percentage of independent board members (%)

	Percent (%)
Independent Supervisory Board members	25%

Management (RWH) In 2025, the Management of RWH consisted of Dr. Georg Hemetsberger (one male member). RWH Management defines the strategic direction of RWH's sustainability activities and holds overall responsibility for the governance, oversight, and integration of all sustainability matters. This includes supervising the assessment of sustainability-related impacts, risks and opportunities, ensuring the implementation of the objectives defined in the Group's sustainability program, and overseeing reporting through this consolidated sustainability statement. RWH Management receives regular progress updates from RWH ESG & CSR Management regarding ongoing ESG projects, the achievement of sustainability targets, and developments regarding ESG-related regulations. Where necessary, external experts are consulted to proactively address new regulatory requirements and related uncertainties on sustainability topics where specific know how is necessary. In addition, RWH Management is kept informed by the respective departments on ESG initiatives allocated to their areas of responsibility. In 2025, RWH Management conducted an in-depth review of the key sustainability impacts, risks and opportunities identified in the Group's first DMA and participated in workshops to identify and assess impacts, risks and opportunities. This assessment forms the basis of the present consolidated sustainability statement. A summary of the material topics is provided in Chapter *1.3.5.*

[3] Mag. Rudolf Weinberger resigned from the Supervisory Board effective 31 March 2026. Hubertus Weinberger, MBA serves as Chairman of the Supervisory Board and Franziskus Weinberger, MIM as Deputy Chairman of the Supervisory Board as of 1 April 2026

[4] ESW Works Council

Management members of RWH and entities

Entity	Name
Rudolf Weinberger Holding GmbH (parent company)	Dr. Georg Hemetsberger (Management)
Eisenwerk Sulzau-Werfen R. & E. Weinberger AG (subsidiary)	Dr. Georg Hemetsberger (CEO) DI Michael Brandner (CTO)
DONAKO Sp. Z o.o. (subsidiary)	Jaroslaw Litwinski (CEO)
VALJII d.o,o, (subsidiary)	Vlado Cvetko (CEO)
MCC International, Inc. (subsidiary)	James E. Keefer (CEO) until October 2025 Dennis Michels (CTO) from November 2025 Jesse Pitell (CFO)

Composition by gender in %

	Male	Female
Management members	100%	0%

RWH ESG & CSR Management: The RWH ESG & CSR Management is responsible for the operational implementation of sustainability within the Group's sustainability program and for monitoring compliance with ESG-related regulatory requirements. This role coordinates sustainability management across the organization and reports directly and regularly to RWH Management, which in turn reports to the Supervisory Board. The RWH ESG & CSR Management is not allocated to a specific department. In close collaboration with all entity departments, this role oversees and coordinates the collection of relevant ESG data, defines and monitors measures, ensures compliance with ESG-related regulatory requirements and establishes sustainability targets aligned with RWH Management. The role is supported by local ESG coordinators, who hold operational responsibility for implementing the ESG requirements at their respective sites and coordinate and monitor data collection processes regarding sustainability related KPIs RWH ESG & CSR Management reports on current developments and sustainability topics, prepares progress reports on the achievement of ESG targets, and manages the Group's participation in ESG ratings. The current RWH ESG & CSR Management has expertise in environmental management, resource efficiency, life cycle assessment, supply chain management and sustainable procurement.

Local ESG coordinators: The local ESG coordinators are responsible for managing sustainability within their respective entities. They serve as the primary contact for the RWH ESG & CSR Management and ensure that group-wide sustainability objectives are effectively implemented locally. In coordination with local departments, they organize and oversee the local collection of ESG data and support the RWH ESG & CSR Management in fulfilling related reporting obligations. Furthermore, they play an active role in embedding sustainability practices within site operations and fostering internal awareness of ESG principles. The local ESG coordinators maintain a regular exchange with the RWH ESG & CSR Management to ensure alignment, consistency and continuous improvement of sustainability performance.

Employee and workers representation: Employee representation at the ESW site is ensured by the Works Council, which, in accordance with the Austrian Labor Constitution Act, holds voting rights on the Supervisory Board of the Group. The DONAKO site likewise has its own Works Council representing employee interests. The entities VALJI and MCC currently have no entity-specific Works Council installed (see details in Chapter *3.1.6, Collective bargaining coverage and social dialogue metrics (ESRS S1-8)*).

Renumeration policy: Currently, there are no incentive schemes or remuneration policies linked to sustainability matters installed for RWH Management or RWH Supervisory Board.

1.2.4 Sustainability strategy and due diligence

The sustainability strategy of the RWH Group was developed by the RWH ESG & CSR Management in alignment with the RWH Management, taking into account existing local Corporate Mission Statements and guidelines of the entities. The strategy was subsequently approved by the RWH Management and presented to the RWH Supervisory Board during the respective Supervisory Board meeting.

Sustainability strategy

RWH Group pursues a holistic understanding of sustainability, guided by two overarching principles: Promotion of *value chain decarbonization* and *creating value for its partners, employees, and society*. To implement these principles, six focus areas are defined, where targeted measures within the Group's sphere of influence offer the greatest potential toward achieving the sustainability objectives.

Integrity & responsible corporate governance: The area focuses on responsible corporate governance and compliance, emphasizing integrity, transparent business processes, and respectful treatment of all internal and external stakeholders. This includes the establishment of compliance frameworks and ESG risk management.

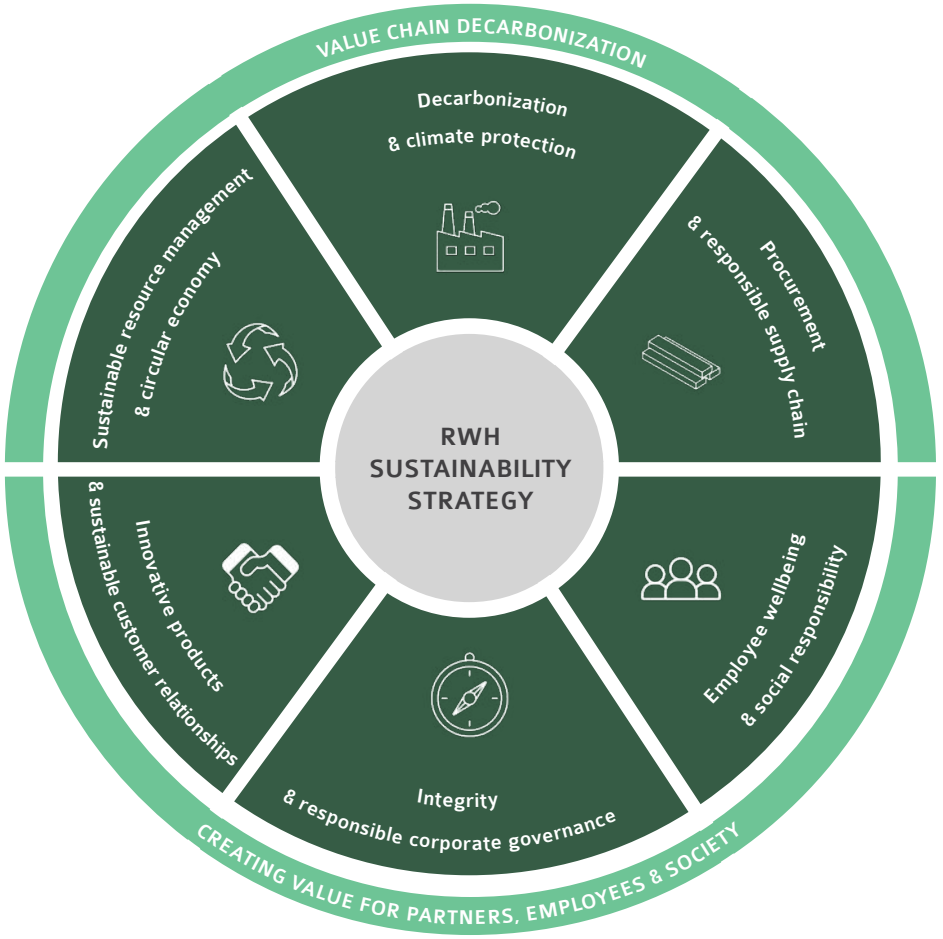
Decarbonization and climate protection: A key focus is on reducing direct process emissions at the Group's own sites and indirect emissions along the value chain through measures and targets in the areas of energy and emissions. Through efficient processes and the use of renewable energy, RWH Group aims to actively contribute to climate change mitigation and environmental protection.

Sustainable resource management & circular economy: This area addresses the sustainable and responsible management of raw materials across the value chain and within Group sites. Key topics include the management of primary and secondary material use and waste management.

Procurement & responsible supply chain: This field covers responsible procurement practices and due diligence within the supply chain and includes measures addressing supplier engagement and risk monitoring.

Innovative products & sustainable costumer relationships: This area focuses on fair and long-term customer relationships and the provision of high-quality, innovative products. Key measures include comprehensive individual service, technical customer support, and flexibility in responding to customer requirements. We foster innovation through the continuous expansion of our product portfolio, our production applications, and services, based on current and potential customer needs. Continuous development of products and production processes is supported by investments in modern production technologies and R&D projects.

Employee wellbeing & social responsibility: This area focuses on protecting and ensuring the safety of employees, promoting healthy and fair working conditions, supporting professional development, and strengthening an inclusive, diverse, and safe workplace.



Due Diligence

The key elements of the due diligence process are briefly described below and referenced in the subsequent table "List of information on the procedure for meeting due diligence obligations" in accordance with ESRS 2, AR 10.

Embedding due diligence: Our due diligence in the areas of environmental, human, and social rights, and anti-corruption is based on legal requirements. Management systems focusing on quality, environment and occupational health & safety at our sites help identify, prevent, and address potential negative impacts from our operations and along the supply chain. We adhere to environmental compliance, human rights protection, and the promotion of ethical business practices using a risk-based approach to implement corrective measures.

Engaging with affected stakeholders: We engage with internal and external stakeholders through continuous dialogue and specific engagement formats. As part of our DMA, relevant stakeholder groups were identified and involved in the process of identifying and assessing the corresponding IROs. Beyond the DMA process, ongoing engagement is maintained internally through employee surveys, staff meetings, and externally through discussions with suppliers and customers, online surveys, and other formats. Further details on how stakeholder interests are integrated can be found in Chapters *1.2.7*, *3.1.3*, *3.2.3* and *4.1.3*.

Identifying and assessing adverse impacts: The identification and assessment of actual and potential impacts, risks, and opportunities is conducted continuously at entity level through risk analyses within the entities' local management systems (e.g., environmental management systems and employee engagement through human resource departments). These local findings are consolidated at Group level as part of the Group's DMA, which incorporates both the inside-out and outside-in perspectives. Consequently, any changes or newly arising IROs identified through these continuous local assessments are integrated into the revision of the Group-level DMA in the annual reporting cycle. These regular assessments therefore ensure that arising IROs or trigger events are continuously captured and integrated into the revision of the Group's DMA.

Taking actions: Measures are derived based on the identified risks and impacts of the DMA and are documented in the respective chapters of the consolidated sustainability statement.

Tracking effectiveness and communication: Communication is carried out within the entities through annual management system reports and through the consolidated sustainability reporting on group-level. The effectiveness of measures and the achievement of targets is monitored and documented annually using the relevant indicators in the respective chapters of the consolidated sustainability statement.

List of information on the procedure for meeting due diligence obligations

Core elements of due diligence	Sections in the sustainability statement
a) Embedding due diligence in governance, strategy, and business model	Embedded in Organizational integration of sustainability and all main topical ESRS Chapters: ESRS E1: *Management of material IROs (ESRS IRO-1, E1-2, E1-3), Policies, strategies and concepts (ESRS E1-2)* ESRS E2: *Management of material IROs (ESRS 2, SBM-2, IRO-1, E2-1, E2-2), Policies, strategies and concepts (ESRS E1-2)* ESRS E5: *Management of material IROs (ESRS 2 SBM-2, IRO-1, E5-1, E5-2), Policies, strategies and concepts (ESRS E5-1)* ESRS S1: *Management of material IROs (ESRS S1-1, S1-3, S1-4), Policies (ESRS S1-1) & Strategies and concepts (ESRS S1-1)* ESRS S2: *Management of material IROs (ESRS S2-1), Policies (ESRS S2-1)* ESRS G1: *Management of material IROs (ESRS G1-1, G1-2, G1-3, G1-4), Policies, strategies and concepts (G1-1)*
b) Engaging with affected stakeholders in all key steps of the due diligence	Embedded in the following Chapters: Chapter *Double materiality assessment* Chapter *Stakeholder management* Chapter *Involvement of affected stakeholders (ESRS 2 SBM-2, S1-2)* Chapter *Involvement of affected stakeholders (ESRS 2 SBM-2, S2-2)* Chapter *Management of material IROs (ESRS G1-1, G1-2, G1-3, G1-4), Whistleblowing and investigation procedures*
c) Identifying and assessing adverse impacts	Embedded in the following Chapters: Chapter *Double materiality assessment* Chapter *Stakeholder management*
d) Taking actions to address those adverse impacts	Embedded in all main topical ESRS Chapters: ESRS E1: *Management of material IROs (ESRS IRO-1, E1-2, E1-3), Measures and activities (ESRS E1-3)* ESRS E2: *Management of material IROs (ESRS 2 SBM-2, IRO-1, E2-1, E2-2), Measures and activities (ESRS E2-2)* ESRS E5: *Management of material IROs (ESRS 2 SBM-2, IRO-1, E5-1, E5-2), Measures and activities (ESRS E5-2)* ESRS S1: *Management of material IROs (ESRS S1-1, S1-3, S1-4), Measures and activities (ESRS S1-3, S1-4)* ESRS S2: *Management of material IROs (ESRS S2-1), Measures and activities (ESRS S2-3, S2-4)* ESRS G1: *Management of material IROs (ESRS G1-1, G1-2, G1-3, G1-4), Measures and activities (ESRS G1-2, G1-3, G1-4)*
e) Tracking the effectiveness of these efforts and communicating	Embedded in Sustainability program and all main topical ESRS Chapters: ESRS E1: *Metrics (ESRS E1-5, E1-6), Targets (ESRS E1-4)* ESRS E2: *Metrics (ESRS E2-4), Targets (ESRS E2-3)* ESRS E5: *Metrics (ESRS E5-4, E5-5), Targets (ESRS E5-3)* ESRS S1: *Metrics, Targets (ESRS S1-5)* ESRS S2: *Targets (ESRS S2-5)* ESRS G1: *Targets (ESRS G1-1, G1-2, G1-3, G1-4)*

1.2.5 Sustainability program

The following sustainability program shows the summary of the sustainability targets and topics within the topical ESRS standards in Chapters 2.1, 2.2, 2.3, 3.1, 3.2 and 4.1. The sustainability program was developed by the RWH ESG & CSR Management in close coordination with the RWH Management and respective departments within the Group and subsequently approved by the RWH Management.

Targets

ESRS	Target	Target (year)
E1	**Climate change**	
	Target reduction of market-based iron & steel core boundary GHG emissions intensity (Scope 1–3) per ton sold goods by 19.5% by 2030 (base year: 2024), from 1.54 tCO_2e per ton of sold goods in the base year to 1.24 tCO_2e per ton of sold goods in the target year	2030
	Target of improvement of Scope 3 data quality for Category *3.1 Purchased goods* by substitution of secondary GHG emissions data with primary supplier-specific GHG emissions data for key raw materials and alloys at ESW until end of Q2 2027	2027
	Target of improvement of Scope 3 data quality for Category *3.11 Use of sold products* by substitution of secondary GHG emissions data with primary supplier-specific GHG emissions data from key suppliers at DONAKO until end of Q2 2027	2027
	Target of completing the roll-out of ESG Policy in the entities VALJI, DONAKO and MCC (combined target for E1, S1, S2 and G1) until end of 2027 including training of employees	end of 2027
E2	**Pollution**	
	Target of zero cases of confirmed violation of SoC/SVHC legislation	2026 and continuous
E5	**Circular economy**	
	Target of maintaining the average share of secondary raw materials in foundries at ESW and VALJI at 70-75% (including externally purchased scrap and internal recycled material in relation to total foundry input)	2026 and continuous
S1	**Own Workforce**	
	Subtopic Working conditions and health & safety:	
	Target of maintaining the TRIFR[5] accident rate at a target value of ≤ 40 in the year 2026 (value in 2025: 44.36)	2026
	Target of maintaining zero fatalities in the year 2026	2026
	Subtopic Equal treatment and opportunities for all:	
	Target of completing the roll-out of ESG Policy in the entities VALJI, DONAKO and MCC (combined target for E1, S1, S2 and G1) until end of 2027 including training of employees	end of 2027
	Target of implementing continuous monitoring of training hours in RWH Group in connection with ESRS S1-13 metrics until end of 2027	end of 2027
	Target of achieving zero confirmed incidents of discrimination or harassment within its own workforce during the reporting year 2026	2026
	Target of achieving zero confirmed severe human rights incidents within its own workforce, including human trafficking, child labor, forced labor, or other forms of modern slavery during the reporting year 2026	2026
S2	**Workers in the value chain**	
	Target of completing the roll-out of ESG Policy in the entities VALJI, DONAKO and MCC (combined target for S1, S2 and G1) until end of 2027 including training of employees	end of 2027
	Target of completing the roll-out of the Supplier Code of Conduct in the entities VALJI, DONAKO and MCC until the end of 2027 including training of employees (combined target for S2 and G1)	end of 2027
G1	**Business conduct**	
	Target of completing roll-out of ESG Policy in the entities VALJI, DONAKO and MCC (combined target for S1, S2 and G1) until end of 2027 including training of employees	end of 2027
	Target of completing the roll-out of the Supplier Code of Conduct in the entities VALJI, DONAKO and MCC until the end of 2027 including training of employees (combined target for S2 and G1)	end of 2027
	Target of zero compliance violations in 2026	2026 and continuous

[5] TRIFR (Total Recordable Injury Frequency Rate) is calculated per 1,000,000 hours worked for the own workforce (excluding non-employees) and corresponds to the ESRS metric Rate of recordable work-related accidents

1.2.6 Risk management and internal control mechanisms for sustainability reporting

RWH Management holds overall responsibility for the consolidated sustainability statement and the completeness and accuracy of the information disclosed while RWH ESG & CSR Management is responsible for the operational implementation of the reporting obligations and manages the overarching concept and editorial refinement. While RWH ESG & CSR Management develops the majority of the report's content, it aligns all information with the relevant departments. When specific sections are drafted by individual departments, RWH ESG & CSR Management coordinates these contributions and conducts regular reviews of these contributions with RWH Management. Within this process, sustainability reporting poses various risks, primarily regarding data inconsistencies across decentralized departments and entities, evolving and changing regulatory requirements resulting in uncertainties and tight reporting timelines that must be aligned with the entities and departments and RWH Management. Risks in this context are identified by RWH ESG & CSR Management by continuous dialogue with departments and local ESG coordinators within the entities. Additionally legal monitoring, participation in expert events or other industry working groups and training regarding sustainability reporting as well as external expertise (e.g. consultancies) form important measures to identify risk. Risks regarding sustainability reporting are mitigated through standardized data collection templates and processes documented in the Reporting Manual, validation steps and strict milestone tracking and timelines. Additionally, RWH Management is directly informed of any critical reporting risks or data gaps during regular meetings with RWH ESG & CSR Management, ensuring that corrective action can be aligned and implemented. To ensure alignment with the general strategy of the Group, all mitigation measures regarding reporting risks must be approved by RWH Management.

The materiality assessment process within the DMA and the general risk management process differ with regard to assessment methodologies, applied time horizons and materiality thresholds and gross-versus-net risk considerations, resulting in financial risks being assessed differently for the consolidated sustainability statement compared to the consolidated financial statement (see also Chapters *1.1.5, Assessment of future financial risks* and *1.3.2, Assessment of risks and opportunities*)

Internal control system for sustainability reporting

RWH ESG & CSR Management focuses on the key activities required for the preparation of the consolidated sustainability statement within the reporting scope. This includes coordinating data collection for ESRS data points with the entities of RWH Group, drafting and alignment of texts for the respective report chapters, coordination of the external limited assurance audit of the consolidated sustainability statement, and oversight of the graphical design and layout of the report. Data collection for the individual ESRS data points is coordinated within the entities by the local ESG coordinators. These local ESG coordinators work in close cooperation with local departments (e.g., environmental management, controlling or procurement) to collect required data for the respective reporting year. As mentioned above, sustainability reporting entails the risk of incorrect disclosures due to human error or incomplete data. To ensure consistent, transparent, and traceable data collection, the Reporting Manual (including definitions, system boundaries, approximation methods, responsibilities, and control mechanisms) was developed by RWH ESG & CSR Management. This manual defines the individual data points, data collection processes and internal controls. The Reporting Manual primarily focuses on the standardized collection of quantitative data points. Qualitative topics are coordinated individually with the entities and are consolidated at group-level by RWH ESG & CSR Management for the sustainability statement. To ensure easy accessibility for all employees involved in the process, the manual is available in both German and English language. A summary of the key internal controls defined in the manual is provided below:

- Review of legal and content-related requirements for sustainability reporting by RWH ESG & CSR Management
- Standardized processes for data archiving and version control (data management) to ensure internal and external progress traceability
- Training and briefing of local ESG coordinators on relevant processes and topics by RWH ESG & CSR Management
- Regular meetings between local ESG coordinators and RWH ESG & CSR Management to ensure continuous dialogue and progress alignment
- Regular meetings between RWH Management and RWH ESG & CSR Management to ensure continuous dialogue and to obtain approvals
- Data collection according to the processes within the manual by local ESG coordinators in cooperation with local departments
- Review of entity-level data by RWH ESG & CSR Management through comparison with prior-year figures and internal benchmarks
- Alignment of entity-level results and consolidated Group results with RWH Group Controlling
- Alignment of financial figures used for selected KPIs (e.g., emissions intensity) with RWH Group Controlling

The Reporting Manual thus serves as the central governance and control instrument for sustainability reporting. The manual is regularly reviewed and updated to mitigate risk

within the reporting process and to reflect changes in processes, responsibilities, and regulatory requirements. Revisions are systematically incorporated and communicated to the relevant entities and functions, ensuring that updates are implemented and considered for subsequent reporting cycles.

In the coming reporting years, additional internal controls will be progressively implemented to eliminate the assessment differences regarding financial risks (see Chapters *1.1.5, Assessment of future financial risks* and *1.3.2, Assessment of risks and opportunities*) and to ensure a gradual alignment of risk assessment within the DMA and the general risk management process.

1.2.7 Stakeholder management

Understanding different expectations and concerns is a key prerequisite for fulfilling the Group's responsibilities towards its broad range of stakeholders. In the context of sustainability reporting, stakeholders are understood to be those individuals or groups whose interests are affected or could be affected positively or negatively by the Group's activities and its direct and indirect business relationships across its value chain and stakeholders, that are users of sustainability statements and respective disclosures. For RWH Group, responsibility towards these stakeholders arises from multiple dimensions: from its core production activities for downstream industries, from its significant role as an employer in the different regions and from its obligations towards its shareholders. The key stakeholder groups are summarized in the following table "Stakeholder overview" and also includes information on stakeholder engagement within the DMA (see column "Stakeholder engagement in the DMA", which is described in detail in Chapter *1.3*). End-users and consumers are not included in the table, as RWH Group operates exclusively in B2B markets. As our products are neither sold directly to nor used by consumers or end-users as defined by the ESRS, consumers and end-users are not considered a relevant stakeholder group (see also *1.3.6, S4 Consumers and end-users*).

Stakeholder overview

Stakeholder groups	Stakeholder	Communication types		Stakeholder engagement in the DMA
Shareholders & financial institutes	↗ Owners ↗ Banks/Financial institutes	↗ Financial reporting ↗ Discussions with banks & owners	↗ Owner meetings	↗ **Financial institutes:** No direct engagement ↗ **Owners:** No direct engagement
Business partners	↗ Customers ↗ Suppliers ↗ Science & Research	↗ Audits ↗ Reporting ↗ Research projects ↗ Social Media ↗ Talks & Conferences	↗ Conferences ↗ Customer and supplier questionnaires ↗ Group's websites	↗ **Customers and suppliers:** Engagement with surveys for IRO evaluation ↗ **R&D:** No direct engagement
Supply chain workers	↗ Workers in the supply chain (Tier-1 – Tier-n)	↗ Costumer and supplier questionnaires ↗ Plant visits		↗ **Workers in the supply chain:** Indirect engagement through secondary data (studies, industry reports, etc.)
Public	↗ Science & Research ↗ Residents and local communities ↗ Associations & Organizations ↗ Media ↗ Competitors	↗ Participation in associations, committees and working groups ↗ Reporting ↗ Social Media ↗ Plant tours & visits	↗ Complaint management ↗ Dialogs & individual discussions ↗ Press relations	↗ **R&D:** No direct engagement ↗ **Residents & local communities:** No direct engagement ↗ **Associations & Organizations:** No direct engagement ↗ **Media:** No direct engagement; monitoring of media coverage on RWH entities and their external perception ↗ **Competitors:** No direct engagement; Screening activities (e.g., website analysis)
Social partners & state bodies	↗ Authorities ↗ Legislators (EU, federal, state) ↗ Trade unions	↗ Authorization procedure ↗ Dialogs and individual discussions ↗ Presentations	↗ Statements ↗ Plant visits ↗ Webinars	↗ **Authorities:** Indirect involvement using official documents and reports for IRO assessment (e.g., emissions measurements) ↗ **Legislators:** Indirect involvement through comprehensive review of applicable laws and regulations ↗ **Trade Unions:** No direct engagement
Internal stakeholders	↗ Employees ↗ Management ↗ Supervisory Board ↗ Works Council	↗ Intranet/Apps ↗ Internal newsletter (e.g., ESW News) ↗ Continuous improvement process (CIP) ↗ Staff meetings ↗ Management meetings & conferences	↗ Works council meetings ↗ Employee performance reviews & discussions	↗ **Employees:** Direct involvement of employees from relevant departments in the identification and assessment of IROs through participation in workshops; additional perspectives of human resource departments and the works council represented in the workshops ↗ **RWH Management:** Direct involvement in the DMA and related workshops, including approval of results ↗ **Works Council:** Direct involvement of the works council as the formal representative of employees in the IRO assessment workshops ↗ **Supervisory Board:** Indirect involvement through written ESG updates for the Supervisory Board meetings
Silent stakeholders	↗ Nature & Environment	↗ Reference to scientific data	↗ Inclusion of research data in the field of biodiversity	↗ **Nature & Environment:** Indirect involvement using scientific studies for IRO assessment and identification and for conducting of the Climate Risk Analysis

1.3 Double materiality assessment

(ESRS 2 IRO-1, IRO-2, SBM-2, SBM-3)

For the identification of material IROs and to derive the relevant disclosure requirements a DMA was conducted in accordance with the principles and requirements outlined in ESRS 1. The DMA was carried out for the first time from October 2024 until April 2025 following four main phases that are described in detail in the following chapters:

- **Step 1:** Identification of impacts, risks and opportunities
- **Step 2:** Assessment of impacts, risks and opportunities
- **Step 3:** Preliminary decision on materiality
- **Step 4:** Validation with external stakeholders & final decision

Approach to stakeholder engagement across Steps 1 to 4

Prior to carrying out the operational activities associated with steps 1–4 of the DMA, the extent and form of stakeholder engagement in the DMA process were determined. The objective was to integrate the perspectives of relevant stakeholders on impacts, risks and opportunities related to the Group. Based on the stakeholder groups in table "Stakeholder overview" in Chapter *1.2.7*, it was determined by RWH ESG & CSR Management in collaboration with relevant departments such as environmental management, procurement and RWH Management which groups should be actively involved or being kept informed in subsequent steps of the DMA process (e.g., active involvement through workshops, interviews, or informed through other conversations formats or written updates) as outlined in column "Stakeholder engagement in the DMA" the table. The type of engagement/consideration during the DMA for the specific stakeholder groups is additionally described in detail below:

- **Shareholders & financial institutes:** Owners were not actively involved in the DMA process but were regularly informed and updated throughout the DMA process through written ESG updates in Supervisory Board meetings, as owners are members of the Group's Supervisory Board. The perspective of financial institutes was considered only to a limited extent by participation in industry-related exchange formats such as the ESG roundtables. These exchanges provided insights into current expectations and requirements of the financial sector regarding sustainability reporting. A direct bilateral dialogue with banks or other financial institutes did not take place during the first DMA.
- **Business partners:** Key business partners, such as customers and suppliers, were actively involved through structured surveys. These surveys were intended to assess and evaluate the IROs and ESRS topics previously identified internally. Customers and suppliers were also able to raise concern, to communicate additional IROs and to provide feedback on ESRS topics previously assessed as uncertain. The results of these surveys were qualitatively analyzed and integrated into the final IRO assessment. Perspectives from science and research in this stakeholder group were incorporated indirectly using scientific publications, for example in the assessment of IROs related to climate change or circular economy. In addition, internal expert reports and official measurement reports (e.g., water quality or air emissions assessments) were considered. Assessments were based on recognized scientific and technical standards, such as those applied in operating permits and environmental guidelines. This ensured that the evaluation of identified IROs was as fact-based and transparent as possible.
- **Supply Chain Workers:** The perspectives of workers along the supply chain were considered indirectly through studies, industry reports, and similar sources - examples of these sources are *Steel value chain: Sustainability in international comparison– iW Consult (2022)* or *Shabani, S., Bachwenkizi, J., Mamuya, S.H. et al. The prevalence of occupational injuries and associated risk factors among workers in iron and steel industries: a systematic review and meta-analysis. BMC Public Health 24, 2602 (2024), https://doi.org/10.1186/s12889-024-20111-w.*
- **Public:** This stakeholder group includes science & research institutes, residents and local communities, associations & organizations, media, and competitors which are either interested in or affected by the Group's economic activities. In the first DMA, none of these stakeholders were directly involved. Regarding competitors, a screening was carried out for benchmarking purposes. At the time of the analysis, no sustainability statements in accordance with *Commission Delegated Regulation (EU) 2023/2772*, or other established standards (e.g., GRI) were available from competitors that could be used for benchmarking. Instead, information from sustainability statements of companies within the iron & steel industry were analyzed to integrate relevant perspectives from upstream and downstream value chain into our IRO identification and to use these insights for benchmarking of IROs.
- **Social partners & state bodies:** Social partners & state bodies, including authorities, legislators (EU, federal, and state level), and trade unions, were primarily considered indirectly through the review and screening of regulatory requirements and legislation at EU-level and national level, while no direct engagement took place.
- **Internal stakeholders:** Comprehensive engagement with internal stakeholders was a key element during the DMA. Within RWH Group, this stakeholder group primarily includes departments and its employees, employee representatives (works council), RWH Management and the RWH Supervisory Board. To capture diverse perspectives, representatives from relevant departments were involved in workshops to assess the Group's material IROs. In addition, the collection of entity-specific IROs generally involved collaboration with different departments, such as environmental management, maintenance, HR, and other functions. This ensured continuous exchange and integration of knowledge throughout the process (further information in Chapter *1.3.2*).
- **Silent stakeholders:** The perspective of nature & environment was considered indirectly using research results and other scientific data in the identification and assessment of IROs, as well as in the identification and evaluation of physical and transitional risks.

1.3.1 Step 1: Identification of impacts, risks and opportunities

Key activity 1: Analysis of strategy and business model

Conducting the DMA required a comprehensive understanding of the Group's business model and strategy, as well as its related value chain. For this purpose, as an initial step, a clear description of the Group's strategy and business model was composed and the value chain was mapped to identify causal relationships and influencing factors (see Chapter *1.2.2*). The strategy and business model was analyzed using existing descriptions of the business model of the specific entities within the financial statements and management reports. With the involvement of RWH Management and by incorporating feedback from employees from relevant departments, such as environmental management and procurement, an illustration of the value chain was developed, illustrating the various processes and activities of our Group operations. The description of the strategy and business model as well as the illustration of the Group's value was reviewed and subsequently approved by RWH Management.

Key activity 2: Creation of the IRO long list

The identification and collection of IROs was conducted using a hybrid approach that combined top-down and bottom-up elements and comprised impacts caused by the Group's own activities (inside-out perspective) as well as risks and opportunities arising from external factors affecting RWH Group or individual entities (outside-in perspective) following the double materiality approach in ESRS 1. The top-down process started with the identification of an initial set of IROs from Group perspective by RWH ESG & CSR Management in close cooperation and alignment with the relevant group-level departments and additional ESW functions, including Human Resources (RWH), Controlling (RWH), Environmental Management (ESW), Procurement (ESW), Sales (ESW) and the CTO (ESW). Additionally, financial statements and management reports from the individual entities were analyzed by RWH ESG & CSR Management and identified IROs within these reports were transferred into an initial IRO long list. Climate-related IROs (regarding physical and transitional risk) in the context of ESRS E1 were identified and integrated on a high-level during the initial IRO identification process. A detailed Climate Risk Analysis (CRA) was conducted at a later stage. Aspects regarding climate-related IROs were assessed using different external sources (see Table "Overview of external tools used in connection with ESRS E1 to E4" below) and in consultation of respective departments (e.g., environmental management or maintenance) at the respective sites. More details regarding the Climate Risk Analysis can be found in Chapter *2.1.2*. Local environmental risk factors in relation to ESRS E2, ESRS E3 and ESRS E4 were also considered by using the external tools and databases listed in the table below to assess local environmental conditions, including water-related risks, protected areas, biodiversity-sensitive areas, and other relevant environmental characteristics.

Overview of external tools used in connection with ESRS E1 to E4

Natural Hazard Overview & Risk Assessment Austria (HORA) – BMLUK	*Climate Change Knowledge Portal of the World Bank Group*
Environmental Atlas of the Slovenian Environment Agency	*Climate Change 2023 Synthesis Report – IPCC*
Biodiversity Risk Filter - WWF	*Water Risk Filter – WWF*
Report „Wasserschatz Österreich" (2021)	*Hydroportal ISOK Poland*
Crisis Response and Intervention Supported by Semantic Crisis Response and Intervention Supported by Semantic Datapooling (CRISO) – Complexity Science Hub	*Climate Change Impact Maps for Austrian Regions – Geosphere Austria*

ESG-related risks from the Group compliance risk catalogue, documenting financial and regulatory risks across various compliance areas, were also included into the IRO long list in alignment with the Chief Compliance Officer (CCO). External sources were also considered to identify IROs within this process, using reports or documentations regarding working conditions or supply chain risk along the value chain published by industry peers. Overall methodological guidance was provided by using the EFRAG implementation guidance and supporting documents[6], the official legal documents of the CSRD Directive and the ESRS Standards, as well as already published sustainability statements of companies in related industries.

To incorporate bottom-up perspectives, the local ESG coordinators were initially briefed by RWH ESG & CSR Management on the IRO collection process and requested to report entity-specific IROs. This included risks and impacts documented in local management reports in connection with ISO14001 management systems and other internal reports (e.g., environmental reports). Additionally, data on energy, material consumption, waste volumes and other environmental metrics as well as results from emissions measurements at production sites were requested from the entities and analyzed on group-level by RWH ESG & CSR Management to comprehensively capture all potentially material environmental IROs. IROs related to social and governance aspects were primarily identified at group level in collaboration with human resources (RWH) and consolidated with the individual social-related IROs submitted by the entities. Other social and governance aspects were incorporated into the IRO long list through discussions with various departments (e.g., Procurement (ESW), Compliance (RWH), Sales (ESW) and Maintenance (ESW)). All IROs submitted by the entities and identified with the different departments were cross-checked by RWH ESG & CSR Management with the existing IRO long list to avoid redundancies. Subsequently, all identified IROs were allocated to the different ESRS topics by ESG & CSR Management and reviewed with RWH Management.

The result of step 1 "Identification of impacts, risks and opportunities" was a consolidated IRO long list with IROs mapped to the respective ESRS topics and incorporated to the internally developed DMA template.

[6] EFRAG guidance document library: *Link*

1.3.2. Step 2: Assessment of impacts, risks and opportunities

Key activity 1: Defining the assessment methodology

The second main step in the DMA formed the assessment of the identified IROs in the IRO long list following the assessment methodology in ESRS 1. For the assessment of impacts, each item was assigned additional attributes, including the type of impact (negative or positive), status (potential or actual), time horizon (see *1.1.3*) and location of occurrence within the value chain (own activities/upstream activities/downstream activities). For risks and opportunities, only time horizon and location of the potential risk or opportunity within the value chain was assigned.

Assessment criteria and scales for impacts risks and opportunities

Depending on the IRO type, the following assessment criteria were used to calculate either an Impact Score for impacts or a Financial Score for risks and opportunities:

- **Assessment of negative impacts:** Negative impacts were assessed using the criteria Scale, Scope and *Irremediability*, and, in the case of potential impacts, *Likelihood*
- **Assessment of positive impacts:** Positive impacts were assessed using the criteria Scale and Scope, and, where the impact is potential, additionally *Likelihood*
- **Assessment of risks and opportunities:** Risk and opportunities were assessed using the criteria (Financial) Scale and Likelihood. The assessment methodology applied in this context currently differs from the methodology used within the general risk management process as also stated in Chapter *1.1.5*, *Assessment of future financial risks* and Chapter *1.2.6*)

The rating scales for the categories Scale, Scope, and Irremediability were defined as integer values ranging from 0 (low) to 5 (very high), while Likelihood was defined with the values 0.75, 0.80, 0.85 and 0.90, where 0.75 corresponds to the lowest probability of occurrence (<25%) and 0.90 to the highest probability of occurrence (>75%). Using the formulas below and the values of the rating scales, the Impact Score was calculated for each positive or negative impact and the corresponding Financial Score for risks and opportunities:

$$Impact\ Score_{(negative\ impact)} = (Scale + Scope + Irremediability)\ x\ Likelihood_{(only\ for\ potential\ impacts)}$$

$$Impact\ Score_{(positive\ impact)} = (Scale + Scope)\ x\ Likelihood_{(only\ for\ potential\ impacts)}$$

$$Financial\ Score_{(Risk/Opportunity)} = (Financial)Scale\ x\ Likelihood$$

Key activity 2: Pre-assessment of impacts, risks and opportunities by RWH ESG & CSR Management

A pre-assessment of all IROs was carried out by the RWH ESG & CSR Management using the respective scales and formulas based on the available documents and reports and in consultation of different departments in order to establish an initial scoring of the IROs long list. This pre-assessment served as the basis for the further evaluation of the IROs within the organization and was presented to and reviewed by the RWH Management for the subsequent preparation of the pre-assessed IRO long list for subsequent assessment workshops.

Key activity 3: Assessment workshops with internal departments

Assessment process & workshops

The main assessment of IROs was conducted through internal workshops with relevant functions and departments.

Departments and functions were divided into two workshops teams by RWH ESG & CSR Management, each having a specific topical focus (focus on environmental and social & governance). Regarding environmental topics experts from environmental management, maintenance as well as the CTO (ESW) and CEO (RWH) were involved. Regarding social & governance topics, the workshop team involved experts from human resources (RWH & ESW), Controlling (RWH & ESW), Procurement (ESW), Works Council (ESW) and the CTO (ESW) and CEO (RWH). The teams were briefed in advance on the workshop objectives and received the pre-assessed IRO longlist. This allowed them to conduct preliminary assessments of the IRO long list, leveraging local risk analyses, relevant departmental documentation and their own professional expertise in line with the due diligence process (see Chapter *1.2.4*). During the workshops led by RWH ESG & CSR Management, each IRO was discussed and assessed within the teams and documented in the template. All participants in the workshop had equal standing in the assessment process, and decisions regarding the evaluations were made jointly within the team. For complex IROs, RWH ESG & CSR Management prepared benchmark materials (e.g. reports from industry peers) to support informed assessment within the teams. The objective was to ensure a transparent and consistent classification, which was particularly achievable in environmental topics, where quantitative data was more readily available compared to social and governance topics. Nevertheless, the assessment of IROs was still predominantly based on qualitative judgments from the expertise of the workshop teams.

Calibration of materiality thresholds for impacts, risks and opportunities

Materiality thresholds for impacts were subsequently defined based on the ranking according to the Impact Scores of all identified impacts. By adjusting the materiality thresholds within the template and using the automatic calculation of Impact Scores within the template, it was possible to directly visualize whether an impact was classified as material or not material (above or below the threshold) based on its current assessment. If inconsistencies were found, such as impacts being over- or under-scored compared to others based on the judgement of the workshop participants, the assessments were reviewed and adjusted accordingly. Through iterative adjustments of the thresholds and parallel analysis of the impacts within the template, the materiality thresholds were calibrated to a level at which all impacts collectively considered as material by the teams were positioned above the materiality threshold. This process resulted in the final definition of the materiality thresholds for impacts.

Materiality thresholds for risks and opportunities were defined using a different approach. In this context, the ranking based on the Financial Score played a secondary role. No predefined quantitative threshold for financial materiality was applied. Instead, the risks and opportunities identified through local risk assessments within the entities' management systems and consolidated in the IRO long list following the due diligence process (see Chapter *1.2.4*) were assessed by the workshop teams, including management representatives and controlling experts, based on their evaluation of the potential financial effects on the Group and the likelihood of occurrence of the respective risk or opportunity. Based on the evaluations and expert judgments within the workshop teams, the materiality thresholds were calibrated by ensuring that no risk or opportunity assessed as important or significant was positioned below the materiality threshold. The materiality thresholds applied here differ from those used in the general risk management process, as also stated in Chapter *1.1.5*, *Assessment of future financial risks* and Chapter *1.2.6.*

Result of the step 2 "Assessment of impacts, risks and opportunities" was an IRO short list with the preliminary decision on materiality for each IRO.

1.3.3 Step 3: Preliminary decision on materiality

After the assessment of the IRO long list and determination of the materiality thresholds resulting in the IRO short list, IROs were subsequently finalized regarding documentation and phrasing and sent out to the workshop teams and RWH Management for final review and approval of the results. As no comments or objections were raised by the teams, the final feedback initiated the next step of the IRO assessment process regarding the external validation of the results briefly described in Chapter *1.3.1, Key activity 2: Stakeholder management and engagement definition.*

Result of step 3 "Preliminary decision on materiality" was the reviewed and approved IRO short list including thorough documentation in the DMA template.

1.3.4 Step 4: Validation with external stakeholders & final decision

Key activity 1: Validation with external stakeholders

Following the completion of the workshops and the preliminary determination of the IRO short list, external stakeholders (customers and suppliers) were involved in the evaluation of the results. For this purpose, an online survey was conducted to gather feedback on the general results of the IRO assessment and to additionally address topics that had been discussed controversially during the workshops (primarily regarding water consumption and withdrawal). The questionnaire also provided customers and suppliers with the opportunity to communicate further topics or IROs that might be relevant and to give general feedback on the sustainability performance of the Group. The selection of customers was guided by broad geographic distribution, relevant sales markets and the financial significance of the customer relationship. Supplier selection for the involvement in the surveys aimed to cover the key raw materials and inputs for the Group's products. The feedback by customers and suppliers was largely consistent with our own assessment. Different perspectives emerged regarding water withdrawal and water consumption - while suppliers assigned a higher level of relevance to this topic, customers considered it to be of lower priority in the context of the Group's economic activities. Following discussions with the RWH Management, as well as environmental management and maintenance department regarding this topic, it was decided that the IROs related to water withdrawal and consumption would ultimately be classified as not material. This decision was based on the fact that differing views persisted during the external evaluation.. No further changes were made in other areas after the external validation of the internal IRO assessment.

Key activity 2: Approval of final IRO short list by RWH Management and RWH Supervisory Board

After finalizing the IRO short list and reviewing the allocation to the respective ESRS topics by RWH ESG & CSR Management, the results were finally reviewed and approved by RWH Management. Subsequently, the Supervisory Board was informed during the RWH Supervisory Board meeting about the results of the DMA and the subsequent reporting obligations for the first consolidated sustainability statement.

The result of step 4 "Validation with external stakeholders and final decision" was the approved short list including all IROs classified as material as well as the table stating the material ESRS topics for 2025.

1.3.5 Material ESRS topics for 2025

The table below shows the material ESRS topics for RWH Group's consolidated sustainability statement for the year 2025 resulting from the IROs classified as material. Specific IROs for each ESRS topic are listed in the respective Chapters (*2.1.1, 2.2.1, 2.3.1, 3.1.1, 3.2.1* and *4.1.1*). The material disclosure requirements connected to the ESRS topics are listed in the *ESRS Index (ESRS 2 IRO-2)*. No additional entity-specific IROs that are not covered by the topical ESRS have been classified as material.

Topical ESRS	Topics, sub-topics and sub-sub-topics	Impact Materiality	Financial Materiality
E1 Climate Change	Adaption to climate change	X	X
	Climate change mitigation	X	X
	Energy	X	X
E2 Pollution	Substances of concern	X	
	Substances of very high concern	X	
E5 Circular Economy	Waste	X	X
	Resource inflows, including resource use	X	X
S1 Own workforce	**Working conditions**		
	Health and Safety	X	X
	Secure employment	X	
	Collective bargaining, including rate of workers covered by collective agreements	X	X
	Freedom of association, the existence of works councils [...] and participation rights of workers	X	
	Adequate wages		X
	Equal treatment and opportunities for all		
	Gender equality and equal pay for work of equal value	X	
	Measures against violence and harassment in the workplace	X	
	Training and skills development	X	
S2 Workers in the value chain	**Working conditions**		
	Health and safety	X	X
	Equal treatment and opportunities for all		
	Gender equality and equal pay for work of equal value	X	
	Measures against violence and harassment in the workplace	X	
	Other work-related rights		
	Child labor	X	
	Forced labor	X	
G1 Business conduct	**Corporate culture**	X	X
	Protection of whistle-blowers	X	
	Management of relationships with suppliers	X	X
	Corruption and Bribery		
	Prevention and detection including training		X
	Incidents		X

1.3.6 Information on non-material ESRS topics

As a result of the first DMA, some ESRS topics were classified as not material for the reasons stated below:

E3 Water and marine resources: Water represents an important resource for the entities of RWH Group, primarily for process cooling, however ESRS E3 was not assessed as material in the first DMA. As described in Chapter *1.3.4*, this decision was based on the fact that no clear consensus could be reached during the internal assessment regarding the materiality of the topic, and differing views also persisted during the external evaluation.

E4 Biodiversity and ecosystems: Within the scope of the DMA, impacts, risks and opportunities related to biodiversity and ecosystem services were identified in the IRO long list. These impacts predominantly related to the upstream value chain, particularly in connection with raw material extraction. In addition, during the workshops, biodiversity-related IROs were assessed less severe compared to other ESRS topics and did not exceed the materiality threshold and were therefore classified as not material for the first consolidated sustainability statement.

S3 Affected communities (S3): Under ESRS, affected communities include indigenous peoples, minorities, economically dependent communities, and groups, as well as local residents. For RWH Group and its production sites, potential impacts on local residents are of particular importance. Accordingly, IROs related to possible impairments of quality of life, such as noise emissions, were included in the double materiality assessment. These IROs are, however, assessed as not material in the initial assessment.

S4 Consumers and end-users: As a manufacturer of rolling mill rolls, components for motor applications and specialized tools, the Group does not maintain direct business relationships with end-consumers (B2C). Consequently, topics such as consumer health and safety or information-related impacts apply indirectly within business-to-business relationships. The topic is therefore assessed as not material in the first DMA.

2 Environment

2.1 E1 – Climate Change

2.1.1 Material IROs (ESRS 2 SBM-3

2.1.2 Interaction with strategy and business model (ESRS 2 SBM-3, GOV-3, E1-1)

2.1.3 Management of material IROs (ESRS IRO-1, E1-2, E1-3)

2.1.4 Targets (ESRS E1-4)

2.1.5 Metrics (ESRS E1-5, E1-6)

2.2 E2 – Pollution

2.2.1 Material IROs (ESRS 2 SBM-3)

2.2.2 Management of material IROs (ESRS 2 SBM-2, IRO-1, E2-1, E2-2)

2.2.3 Targets (ESRS E2-3)

2.2.4 Metrics (ESRS E2-4)

2.3 E5 – Circular Economy

2.3.1 Material IROs (ESRS 2 SBM-3)

2.3.2 Management of material IROs (ESRS 2 SBM-2, IRO-1, E5-1, E5-2)

2.3.3 Targets (ESRS E5-3)

2.3.4 Metrics (ESRS E5-4, E5-5, E5-6)

2.1 E1 – Climate Change

2.1.1 Material IROs (ESRS 2 SBM-3)

Material impacts (Inside-Out)

ESRS topic	Impact description	Actual/Potential Positive/Negative	Time horizon	Causation/ Localization
Climate change mitigation	RWH Group contributes with its activities to climate change, increasing the frequency of flooding caused by heavy rainfall, forest fires, through the GHG emissions it produces.	actual negative	long-term	own sites/ value chain
	High Scope 3 GHG emissions from the purchase of raw materials with a significant negative impact on climate change (Note: this impact is material for G1, E1 and E5 in Chapters *2.1.1*, *2.3.1* and *4.1.1*)	actual negative	long-term	value chain
	Scope 1 GHG emissions have a negative impact on climate change due to the use and combustion of fossil fuels and the use of electricity from non-renewable sources in production processes	actual negative	long-term	own sites
	Use of recycling material reduces the negative impact caused by Scope 3 GHG emissions by reducing the need for primary raw materials and contributing to climate protection.	actual positive	long-term	own sites
Energy	High energy consumption at the sites due to energy-intensive production processes and the use of non-renewable energy sources	actual negative	short-term	own sites
	Positive contribution through 100% renewable electricity at the ESW site	actual positive	short-term	own sites
	Energy-intensive industrial processes in the upstream and downstream value chain with negative effects on the climate when using non-renewable energy sources	actual negative	short-term	value chain

Material risks and opportunities (Outside-In)

ESRS topic	Risk/opportunity description	Risk/Opportunity	Time horizon	Causation/ Localization
Adaptation to climate change	Heavy rain, heavy snow, flooding, hail can cause damage to infrastructure, potentially resulting in repairs or operational disruptions with financial consequences **(physical risk)**	risk	medium-term	own sites
	Storms can cause damage to infrastructure, potentially resulting in repairs or operational disruptions with financial consequences **(physical risk)**	risk	medium-term	value chain
	The increase in the severity and frequency of extreme weather events increases the risk of supply bottlenecks, delayed deliveries, and unpredictable price increases due to the global supply chains **(transitional risk)**	risk	long-term	value chain
Climate change mitigation Energy	Potentially increased costs associated with decarbonization measures in line with European and national legislation. **(transitional risk)**	risk	medium-term	own sites
	Climate change mitigation measures can have a positive impact on the Group's reputation and strengthen its market position. **(transitional risk)**	opportunity	medium-term	own sites
	Increased customer requests regarding sustainability data can result in higher costs (personnel, know-how, etc.). **(transitional risk)**	risk	medium-term	own sites
	Increased expenses from the procurement process due to CO2 certificates and the Carbon Border Adjustment Mechanism (CBAM). **(transitional risk)**	risk	medium-term	own sites
Energy	Financial risk due to volatility of energy prices **(transitional risks)**	risk	medium-term	value chain
	Blackouts or failure of gas or energy supply **(physical risk)**	risk	medium-term	own sites
	ESW: Change in demand towards high-alloy products) results in higher energy consumption **(transitory risk)**	risk	medium-term	own sites
	No or insufficient availability of renewable energy at production sites for decarbonization **(transitory risk)**	risk	medium-term	own sites

2.1.2 Interaction with strategy and business model

(ESRS 2 SBM-3, GOV-3, E1-1)

Transition plan for climate change mitigation (ESRS E1-1)

RWH Group is committed to climate protection and the continuous improvement of environmental and energy performance. The Group targets a reduction of GHG emissions intensity across Scope 1, Scope 2 and Scope 3 by 19.5% by 2030 from the 2024 baseline considering the target scope stated Chapter *2.1.4, Target boundaries*. The decarbonization path presented in *Figure 1* shows the GHG emissions intensity within the scope of the Group's decarbonization target boundary (see also Footnote *7*) for the base year 2024 of 1.54 tCO_2e per ton sold goods and the respective expected contributions of the different decarbonization levers to achieve a target GHG emissions intensity of 1.24 tCO_2e per ton sold goods until the target year 2030 (for details see Chapter *2.1.4*.). The decarbonization plan is coordinated with and approved by RWH Management. The operational implementation of measures and progress monitoring is managed by RWH ESG & CSR Management in collaboration with the local ESG coordinators in the entities.

Decarbonization Plan: The plan outlines the key decarbonization levers at group-level, including expected GHG emission reduction for each lever. The levers focus on renewable electricity, energy efficiency & electrification and Scope 3 decarbonization. The Group has not yet assessed the financial resources to implement the transition plan and does therefore not provide quantitative disclosure of investments, nor financial resources allocated to the different decarbonization levers of the transition plan. However, several important climate change mitigation actions are already in the planning or implementation phase (e.g., the modification of the melting furnace at ESW) and are accordingly covered by internal budgeting processes. An assessment of the financial resources required to implement the transition plan will be conducted in 2026, prioritizing those related to scaling up renewable electricity as a main decarbonization lever, followed by the other levers described below. As the Group does not report under the EU Taxonomy Regulation (Regulation (EU) 2020/852)), no disclosures are made with regard to key performance indicators on taxonomy-aligned Capex (see scope of the external limited assurance audit in the *Independent Assurance Report*).

Decarbonization levers and their contributions to the decarbonization plan:

- **Renewable electricity:** Electricity from renewable energy sources represents a key decarbonization lever within the Group's transition pathway. The transition to electricity sourced from 100% renewable energy is expected to contribute approximately 13% to the reduction of Scope 1–3 GHG emissions within the target scope compared to the base year 2024, corresponding to an GHG emissions intensity reduction of approximately 0.20 tCO_2e per ton of sold goods by 2030 of the base year GHG emissions intensity. Detailed measures regarding renewable electricity can be found in Chapter *2.1.3*.
- **Energy efficiency & electrification:** Energy efficiency improvements and electrification measures form an important component of the Group's decarbonization strategy, particularly at energy-intensive foundry operations. Based on current assessments, energy efficiency improvements are expected to contribute at least 2% reduction in Scope 1 and Scope 2 GHG emissions by 2030, corresponding to an approximate reduction of 0.01–0.02 tCO_2e per ton of sold goods of the base year GHG emissions intensity. Electrification represents an additional decarbonization lever, particularly for heat treatment and auxiliary processes at foundry sites. However, according to internal analysis, electrification is associated with high investment requirements and technological constraints which currently limit large-scale implementation under existing market conditions. RWH Group therefore continuously evaluates electrification but due to uncertainties regarding feasibility and economic viability, no quantitative emissions reduction potential from electrification is currently included in the decarbonization plan. Accordingly, electrification is presented in brackets in *Figure 1* below to reflect its qualitative consideration within the decarbonization strategy without a quantified contribution to the current decarbonization path. Detailed measures regarding energy efficiency & electrification can be found in Chapter *2.1.3*.
- **Scope 3 decarbonization:** Indirect GHG emissions through purchased goods represent a major share of the Group's GHG emissions and therefore constitute a key lever within the decarbonization plan (see details in Chapters *2.1.4* and *2.1.5*). The Group's decarbonization approach focuses on increasing the procurement of GHG emissions-reduced raw materials and semi-finished products as well as increasing the share of recycled and secondary materials where technically feasible. Based on current analyses, with these activities a reduction of Scope 3 GHG emissions within the target boundary (see Chapter *2.1.4*, Target boundaries) by 8% is achievable, corresponding to an overall reduction of approximately 6% of Scope 1-3 target boundary GHG emissions and an GHG emissions intensity reduction of approximately 0.09 tCO_2e per ton of sold goods of the base year 2024 GHG emissions intensity. The realization of these reductions depends significantly on technological developments, market availability, supplier decarbonization progress, regulatory developments and product quality requirements. Detailed measures regarding Scope 3 decarbonization can be found in Chapter *2.1.3*.

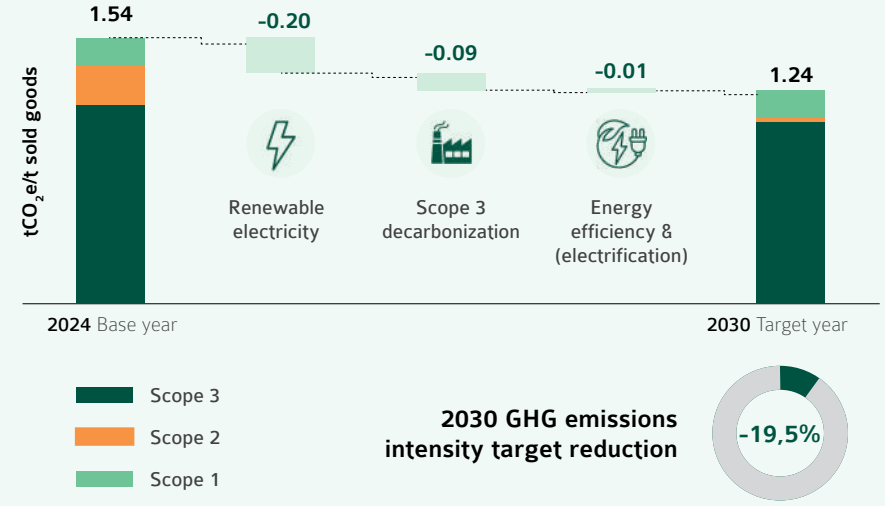


Figure 1: Decarbonization path and emissions intensity reduction target of RWH Group under the Iron & Steel methodology[7]

A qualitative assessment of locked-in emissions relating to the transition plan indicated that the Group's foundries at the ESW, VALJI, and MCC sites are the largest contributors to overall emissions. Within these sites, melting and heat treatment processes represent a significant source of energy consumption, with VALJI being particularly relevant due to its natural gas-fired heat treatment furnaces. Electricity-related emissions are also notably high at VALJI and MCC, as their market-based electricity mix is still largely based on non-renewable energy sources. The substitution of current energy sources is subject to substantial technical and operational challenges. These locked-in emissions may therefore jeopardize the achievement of the Group's climate targets if investments are not economically viable or technically feasible, or if renewable electricity is unavailable from the local grid or not available at competitive prices. Furthermore, the long service life of existing assets and infrastructure may create transition risks, particularly if low-carbon technologies become available at scale.

Due to the first year of publication of the consolidated sustainability statement, no information on measurable progress in implementing the transition plan and corresponding decarbonization plan is disclosed. During the reporting year, RWH Group focuses primarily on establishing ESG management structures and fulfilling reporting requirements, including the development and implementation of processes for quantitative and qualitative metrics, which form the basis for tracking progress in future reporting periods.

Material impacts, risks and opportunities related to strategy and business model

The resilience of RWH Group's business model and strategy was initially analyzed during the DMA with a high-level analysis of climate related risks connected to the Group. Following the high-level analysis of climate-related risks during the DMA, a subsequent Climate Risk Analysis was conducted to identify and assess climate-related physical and transitional risks using the SSP1-1.9 and SSP5-8.5 scenarios taking into account all entity locations and considering supply chain aspects.

Climate Risk Analysis

The first Climate Risk Assessment evaluated physical and transition risks across all operational sites. While the primary focus was on the Group's own operations, climate-related risks within the value chain were also assessed at a high level to establish a baseline for future more detailed analysis. To identify physical (acute/chronic) and transition climate risks, the Group utilized local risk analyses from individual entities' management systems as well as external sources (including IPCC, GeoSphere, WWF Risk Filter, and HORA; see also Chapter 1.3.1, Table "Overview of external tools used in connection with ESRS E1 to E4"). As chronic climate risks intensify because of global warming, local acute hazards may also become more severe. To reflect this interaction in the risk assessment, individual risks and their potential evolution over time were analyzed across two climate scenarios, considering short-, medium- and long-term time horizons (see time horizons in Chapter 1.1.3). Scenario 1 (IPCC SSP5-8.5) assumes a rollback of climate protection measures, resulting in significant global warming and a pronounced increase in the severity and frequency of physical climate

[7] The visualized scope in the graph does not represent the Group's total GHG emissions intensity including all GHG emissions of the CCF of the base year 2024, but the GHG emissions intensity of Scope 1-3 GHG emissions covered by the decarbonization target under the Iron & Steel methodology including Scope 1 and 2 GHG emissions of ESW/RWH, VALJI and MCC and respective Scope 3 GHG emissions shares of all entities ESW/RWH, VALJI, DONAKO and MCC (details on the target scope are outlined in Chapter *2.1.4 Target boundaries*)

hazards. Scenario 2 (IPCC SSP1-1.9) assumes a gradual tightening of regulatory requirements for greenhouse gas emissions, with the objective of achieving net-zero emissions by 2050. Under this scenario, climate risks are expected to occur more frequently in the short and medium term, but to remain at a more moderate level in the long term compared to the SSP5-8.5 scenario.

The analysis showed that RWH Group is exposed to physical hazards such as flooding, heavy rainfall, hail, storms, and heat stress, which may lead to infrastructure damage, production interruptions, or negative effects on employee health. In the SSP5-8.5 scenario, heavy precipitation events are projected to be more frequent and intense than in the SSP1-1.9 scenario in the medium and long term, whereas both paths remain largely aligned in the short term. The impacts associated with these risks can have a considerable influence on the Group's business activities, as production interruptions due to infrastructure damage caused by acute hazards can result in significant financial losses. Potential financial implications also include increased capital expenditure for adaptation measures. Acute climate hazards do not only pose a climate risk at the Group's sites but also in the supply chain, as they can result in supply bottlenecks, delayed deliveries, and price volatility which can directly affect our business activity due to our high dependency on raw materials and energy. Under an SSP5-8.5 scenario, an increasing frequency and intensity of such extreme events can be expected in the medium to long term. As a result, not only the risk itself increases, but also the exposure and vulnerability: due to global climatic changes, countries of raw material suppliers that currently show only low exposure to extreme weather events from today's perspective may also be affected in the long term.

Transitional risks arise primarily from tightening climate related regulations, carbon pricing mechanisms, and decarbonization requirements. Due to our high energy consumption, RWH Group may be particularly affected by rising carbon prices, stricter emission standards, and increasing requirements for low-carbon production processes. These requirements are expected to be continuously tightened in the SSP1-1.9 scenario, as an ambitious transition toward a lower-carbon economy can only be achieved through stricter emission regulations worldwide. The transition toward a lower-carbon economy is therefore expected to impact on energy mix, operating costs, and investment requirements.

The assessment indicates that near-term climate-related risks are largely manageable through existing technical, organizational, and emergency measures, while mid- to long-term risks may increase significantly under higher-emission scenarios, particularly with regard to increased climate hazards within the supply chain potentially disrupting operational continuity. In addition, transitional risks under climate policy-driven scenarios (SSP1-1.9) must be mitigated through continuous monitoring of regulatory developments, the gradual implementation of decarbonization measures, targeted investments in low-carbon technologies and energy efficiency, as well as the progressive adaptation of procurement and production processes. Continuous monitoring and adaptive measures are therefore essential to maintain the long-term resilience of RWH Group's business model and strategy.

2.1.3 Management of material IROs (ESRS IRO-1, E1-2, E1-3)

Description of procedures for the identification and assessment of significant climate-related impacts, risks and opportunities (ESRS 2 IRO-1)

The impacts, risks and opportunities (IROs) related to climate change in accordance with ESRS E1 were identified as part of the DMA (see Chapter *1.3*) and the subsequent Climate Risk Analysis (see Chapter *2.1.2, Climate Risk Analysis*). Both assessments included own operation, upstream and downstream value chain considerations (for value chain overview see Chapter *1.2.2, Value chain of RWH Group and its entities*).

Impacts on climate change have been assessed by identifying and analyzing greenhouse gas (GHG) emissions of the Group and its entities, in particular carbon dioxide (CO_2) but also other climate-relevant gases (e.g., methane, nitrous oxide etc.). For this purpose, RWH Group prepared a comprehensive CCF in accordance with recognized GHG Protocol standard to identify emission hotspots across all entities and within the different scopes. The GHG Protocol distinguishes between the following emission scopes:

- **GHG emissions (Scope 1):** direct emissions such as the use of natural gas and fuels from sources owned or controlled by the Group
- **GHG emissions (Scope 2):** indirect emissions from purchased energy such as electricity, steam, district heating, or cooling generated outside the Group's organizational boundaries but consumed by and within the Group's sites
- **GHG emissions (Scope 3):** all other indirect emissions occurring along the value chain, both upstream and downstream (e.g., including purchased goods and services, transportation, processing of waste, business travel, or capital goods)

Based on the first Group CCF results for the year 2024, RWH Group identified negative climate-related impacts arising from emissions from its own production processes (Scope 1 and Scope 2), driven by the use of fossil fuels (e.g., natural gas) and the procurement of electricity from non-renewable sources. Additional negative impacts result from indirect emissions in the upstream and downstream value chain, which are systematically analyzed as part of the GHG accounting. Significant upstream Scope 3

GHG emissions mainly arise from purchased goods, reflecting the material- and energy-intensive nature of the Group's business model and the emissions associated with the processing and manufacturing of raw materials, alloying elements, and intermediate products in the upstream value chain, but also within other Scope 3 categories. At the same time, RWH Group tires to mitigate climate change through various measures aimed at reducing emissions and improving efficiency. The results of the comprehensive CCF for the year 2025 are disclosed in Chapter *2.1.5*. The process for identifying climate-related risks, as well as the data sources and scenarios used for their assessment, are documented in Chapters *1.3* and *2.1.2*, *Climate Risk Analysis*.

Policies, strategies and concepts (ESRS E1-2)

IROs related to E1 are managed at Group level through the ESG governance structure described in Chapter *1.2.3*. Operational management at Group level lies with RWH ESG & CSR Management, which coordinates E1-related activities across the Group in collaboration with the local ESG coordinators of the individual entities. While the implementation of specific measures takes place at entity level, relevant E1-related are monitored and consolidated at Group level by RWH ESG & CSR Management. The policies described below provide the framework for managing E1-related IROs across the Group and its entities.

ESG Policy (ESW): The ESG Policy is intended as the central policy governing climate-related matters under ESRS E1. The ESG Policy was adopted for the first time in 2025 for ESW/RWH. At the time of reporting, the policy has not yet been rolled out across all other entities of RWH Group (DONAKO, VALJI and MCC). The objective of a group-wide implementation within all entities is therefore reflected in Chapter *2.1.5.* Following its rollout, the ESG Policy will serve as the central framework for the management of E1-related IROs across all entities of RWH Group. It establishes the overarching principles for the consistent promotion of sustainable development and aims to prevent sustainability-related risks by defining clear guidelines for responsible and sustainable business conduct. In this context, it promotes the implementation of preventive and effective measures to address environmental impacts, risks and opportunities. With regard to climate change mitigation, the policy focuses on reducing GHG emissions within its operations and along the value chain through renewable energy sources, energy efficiency measures, process optimization and circular material use. Regarding climate change adaptation, the ESG Policy addresses the consideration of physical climate-related risks and their potential impacts on operations, assets and the value chain as listed in the internal compliance risk catalog, the Climate Risk Analysis and DMA.

Environmental Management Systems (ISO14001) (at ESW, VALJI and DONAKO): A key pillar supporting local climate-related governance under ESRS E1 is the implementation of ISO14001 certified environmental management systems within these entities. ISO14001 is currently in place at ESW, DONAKO, and VALJI. At the time of reporting, no decision has been made regarding the certification of the environmental management system at MCC in accordance with ISO14001. The effectiveness of these management systems at ESW, DONAKO and VALJI is ensured through periodic internal and external audits covering defined operational areas. Responsibility for the implementation and maintenance of the environmental management systems lies within the local environmental departments of the respective entities. Local environmental reporting, including the continuous monitoring of production-relevant environmental KPIs, plays a significant role in setting site-specific objectives and managing environmental performance, particularly with regard to energy use, emissions, and resource efficiency.

Measures and activities (ESRS E1-3)

To address its material IROs in E1, RWH Group has implemented and is continuously developing a set of operational and strategic measures aimed at reducing greenhouse gas (GHG) emissions across its own operations and along the value chain.

Decarbonization plan: One of the key measures under ESRS E1 is the development and implementation of the transition plan for climate change mitigation and the corresponding decarbonization plan. It provides a structured roadmap for climate change mitigation, including prioritized decarbonization levers. A detailed description of the core measures within each decarbonization lever is provided below.

- **Renewable Electricity:** The procurement of electricity from 100% renewable sources forms a key measure of the decarbonization strategy and an important basis for reducing Scope 2 GHG emissions. Expanding the share of renewable electricity across the Group and its entities is therefore essential to achieving the defined emission reduction targets, with the greatest reduction potential identified at the VALJI and MCC sites, where the current electricity supply is still largely based on fossil energy sources. Where available, renewable electricity is therefore actively considered and integrated into the energy supply of the Group's sites, with the transition expected to be implemented through electricity supply contracts based on 100% renewable energy sources by 2030 in the entities VALJI and MCC. At the same time, the implementation of this measure depends on the availability of renewable electricity in the respective countries of operation and procurement at competitive market prices, as energy represents a critical cost and operational factor in the Group's energy-intensive industry.
- **Energy efficiency & electrification:** Energy efficiency measures are continuous process optimization within the foundries and machine shops including plant retrofits and technical upgrades, melting furnace refurbishments, electrification of selected processes thereby lowering energy consumption and subsequent Scope 1 and Scope 2 GHG emissions. Measures already implemented include the refurbishment of a melting furnace in 2024, while further refurbishments

of an additional melting furnace is being conducted in 2025 to further improve energy efficiency and reduce production-related emissions. Additional planned measures include further process optimization within all entities and the evaluation of electrification opportunities for heat treatment and auxiliary processes at VALJI, although some initiatives remain subject to high investment requirements, long amortization periods, and technological constraints under current market conditions and are continuously evaluated.

↗ **Scope 3 decarbonization:** Key measures regarding Scope 3 decarbonization include the increased procurement of emission-reduced raw materials, alloys, and semi-finished products from suppliers, as well as the increased sourcing of recycled and secondary raw materials instead of primary inputs where technically feasible. This is only possible through supplier engagement and reliable data to actively navigate Scope 3 decarbonization. Key actions are stated below:

- **Key action 1:** Key action 1 represents the improvement of data quality of Scope 3 emissions for key raw materials such as pig iron, alloys and electrical steel sheets. RWH Group therefore seeks to progressively increase the share of primary supplier-specific GHG emissions data and reduce reliance on secondary GHG emissions datasets for key raw materials and semi-finished products through supplier engagement. The objective is to obtain corresponding primary GHG emissions data for the main emission drivers at ESW by Q2 2027, as those represent the main contributors regarding Scope 3 GHG emissions within the Group. The substitution of secondary data sets of key Scope 3 GHG emission drives within the other entities is subsequently planned for 2027 prioritizing the entities VALJI and DONAKO.
- **Key action 2:** Key action 2 builds on the improved Scope 3 GHG emissions data quality achieved through Key Action 1. Based on the expected enhanced transparency regarding the GHG emissions data of key raw materials, RWH Group intends to initiate the procurement of emission-reduced raw materials in 2027. This particularly relates to key emission drivers such as pig iron, specific alloys and electrical steel sheets. Based on internal analyses, RWH Group expects that the largest Scope 3 GHG emission reduction potential can be achieved through the procurement of emission-reduced raw materials and semi-finished products. At the current stage, however, no specific procurement volumes can yet be defined, as the Group is still at an early stage of evaluating available market options, technological developments and supplier capabilities.
- **Key action 3:** Key action 3 focuses on evaluating the selective substitution of alloys with secondary materials where technically feasible and economically viable. Due to the high technical, material and quality requirements applicable to the Group's products, such substitution measures are expected to be limited to individual materials and are assessed on a case-by-case basis through dedicated quality assessments, material testing and feasibility analyses. Consequently, RWH Group does not expect large-scale substitution of primary materials with secondary materials in the period up to 2030 and currently anticipates that the majority of Scope 3 GHG emission reductions will be achieved through the procurement of emission-reduced raw materials as described under Key Action 2. At the current stage, no specific information can yet be provided regarding the relevant materials, substitution rates or procurement volumes.

Use of secondary materials: The maintenance of the current share of secondary materials in products, including internal production scrap and externally sourced scrap from suppliers represents a central measure to maintain the current demand of primary raw material sourced from suppliers in the upstream value chain. Further information on material management and circularity measures is provided in Chapter 2.3.2.

Conducting the ESG Policy roll-out: A key measure in 2026 and 2027 is the preparation and execution of the activities required for the roll-out of the ESG Policy as a uniform ESG framework across the Group entities. The roll-out is conducted and coordinated by the Chief Compliance Officer in cooperation with RWH ESG & CSR Management.

2.1.4 Targets (ESRS E 1-4)

Methodological approach

The quantitative reduction target outlined in the transition plan for climate change mitigation refers to market-based GHG emissions intensity in Scope 1-3 and represents a gross GHG emissions intensity reduction target without considering carbon credits or carbon removals. The target is developed by using the *Science Based Target Initiative Iron & Steel methodology*[8] and Steel Science-Based Target-Setting Guidance as guidance.

The target currently only provides orientation towards a 1.5°C-aligned decarbonization trajectory with the Paris Agreement[9] as it is not fully aligned with the SBTI framework and not formally approved by the Science Based Target Initiative (SBTi) and does therefore not constitute an official SBTI target. It is currently not fully aligned with the framework, as the quantitative Scope 3 target boundary currently covers approximately 47% of total Scope 3 base year GHG emissions and therefore does not exceed the minimum Scope 3 coverage threshold of 67% required under the SBTi framework (see details regarding target scope and coverage in *Target boundaries* below).

Reduction target details

RWH Group targets a reduction of GHG emissions intensity across Scope 1, Scope 2 and Scope 3 by 19.5% by 2030 from the base year 2024 covering the GHG emissions in Scope 1-3 outlined in section Target boundaries below and considers expected developments in production volumes and scrap rate according to the SBTi framework. Base year GHG emissions intensity within the target boundary is 1.54 tCO_2e per ton sold

[8] SBTi Steel Science-Based Target-Setting Guidance (Version 1.0, July 2023): *Link*

[9] RWH Group is not exempt from the Paris-aligned EU benchmarks in accordance with Commission Implementing Regulation (EU) 2022/2453 and Commission Delegated Regulation (EU) 2020/1818 (Article 12 (1))

goods (representing absolute target boundary Scope 1-3 GHG emissions in the base year of 66,942 tCO_2e) and the target GHG emissions intensity in 2030 is 1.24 tCO_2e per ton sold goods (representing absolute target boundary Scope 1-3 GHG emissions in the target year of 54,375 tCO_2e) , representing a reduction of GHG emissions intensity within the target boundaries by 19.5%.

The largest contribution to the planned decarbonization pathway (as outlined in Chapter *2.1.2, Transition plan for climate change mitigation (ESRS E1-1)* and Chapter *2.1.3, Measures and activities (ESRS E1-3)*) is expected to result from the transition to 100% renewable electricity at the sites VALJI and MCC, contributing approximately 13% to the reduction of Scope 1–3 GHG emissions within the target scope by 2030 compared to the 2024 base year, corresponding to a GHG emissions intensity reduction of approximately 0.20 tCO_2e per ton of sold goods. Energy efficiency improvements at all sites are expected to provide an additional contribution of at least 2% reduction in Scope 1 and Scope 2 GHG emissions, corresponding to approximately 0.01–0.02 tCO_2e per ton of sold goods. Furthermore, Scope 3 decarbonization measures, particularly relating to emission-reduced raw materials and supply chain activities, are expected to contribute approximately 6% to the overall reduction of Scope 1–3 target GHG emissions, corresponding to a GHG emissions intensity reduction of approximately 0.09 tCO_2e per ton of sold goods. Currently, no long-term targets until 2050 have been defined within RWH Group. The absence of long-term targets reflects the current stage of the group-wide decarbonization strategy and uncertainty regarding technological and regulatory developments and market conditions. RWH Group intends to reassess the development of long-term targets as part of future updates.

Target boundaries

The following target boundaries represent the covered emissions by the quantitative reduction target in the "Targets" table below.

- **Covered Scope 1 GHG emissions by reduction targets:** The covered base year GHG emissions for Scope 1 include direct emissions from production sites of ESW/RWH, VALJI, and MCC (> 98% of overall Scope 1 emissions of the Group's CCF of the 2024 base year) following the *Steel Science-Based Target-Setting Guidance*. Scope 1 GHG emissions from DONAKO do not fall within the iron & steel core boundary according to the *Steel Science-Based Target-Setting Guidance* and are therefore not included in the Scope 1 GHG emissions for the target (representing approximately <2% of RWH Group's Scope 1 GHG emissions in the base year). Emissions from Group vehicles of all entities are not included in Scope 1 and Scope 2 GHG emissions following the SBTi iron & steel core boundary.
- **Covered Scope 2 GHG emissions by reduction targets:** The covered base year GHG emission for Scope 2 include GHG emissions from the sites ESW/RWH, VALJI and MCC. Scope 2 GHG emissions from DONAKO are, similar to Scope 1, not within the SBTi iron & steel core boundary according to the *Steel Science-Based Target-Setting Guidance* and are therefore not included in the Scope 2 GHG emissions for the target. The Scope 2 GHG emissions covered by the target represent 85% of the RWH Group's overall Scope 2 GHG emissions of the Group's CCF of the base year. Approximately 15% of the Group's Scope 2 GHG emissions from the entity DONAKO are therefore not covered by the target.
- **Covered Scope 3 GHG emissions by reduction targets:** Scope 3 GHG emissions include the share of raw materials, alloys, and semi-finished products from category *3.1 Purchased goods* of the GHG Protocol across all sites including ESW/RWH, VALJI, MCC and DONAKO according to the *Steel Science-Based Target-Setting Guidance*, representing approximately 47% of overall Scope 3 GHG emissions of the base year. Ferroalloy GHG emissions in category *3.1 Purchased goods* are excluded following SBTi recommendations due to the lack of a widely accepted 1.5°C decarbonization pathway for ferroalloy production. All other Scope 3 categories according to the GHG Protocol are not covered within the target.
- **Overall covered Scope 1-3 GHG emissions by reduction targets:** Compared to overall gross GHG emissions according to the CCF for the base year 2024, the GHG emissions covered by the target represent 98.6% of overall emissions in Scope 1, 84.9% of overall GHG emissions in Scope 2, and 47.4% of overall GHG emissions in Scope 3 (excluding optional category *3.11 Use of sold products* acc. to *GHG Protocol*[10]). Considering the target boundaries across Scope 1–3, this represents a total coverage by the quantitative target of 54% of the overall GHG emissions in Scope 1-3.

Target details related to data quality improvement in Scope 3

In addition to the quantitative target, RWH Group is pursuing continuous improvement of data quality in Scope 3 through a supplier engagement target. In particular focusing on category *3.1 Purchased goods* in connection with the decarbonization levers in the upstream value chain as stated in the decarbonization plan in Chapter *2.1.2*. By increasing the implementation of primary data for key material categories (pig iron, alloys, and semi-finished products), emissions in this category can be better managed over the medium and long term. Furthermore, data quality in category *3.11 Use of sold products* will also be improved, with a specific focus on the DONAKO site. Due to the long service life of the products and installations in which DONAKO components are incorporated and depending on the energy sources applied during their service-live, this category currently results in significant emissions. As Category *3.11 Use of sold products* is not included in the quantitative target boundary due to being an optional category (see Footnote *10*), improvement in data quality for this category is considered an additional qualitative objective only and does not contribute to the quantitative GHG

[10] The products manufactured by RWH Group are typically embedded in industrial plants and machinery, where energy consumption occurs at plant or system level and do not directly consume energy during their service life. As such, any emissions arising during use are considered indirect emissions. Therefore, emissions from category *3.11 Use of sold products* are considered "optional" in accordance with GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Table 5.4, p. 36)

emissions reduction target in the table below). Nevertheless, improving data quality and engaging directly with key customers regarding production volume represents a crucial step to increase reliability of metrics reported under this category in ESRS E1-6.

Target details related to ESG Policy roll-out

The objective is to establish the ESG Policy as a uniform ESG framework across all Group entities by the end of 2027 and to ensure that employees and management functions receive appropriate training to enable its effective implementation and application.

Targets

Target	Target (year)	Note
Target reduction of market-based iron & steel core boundary GHG emissions intensity (Scope 1–3) per ton sold goods by 19.5% by 2030 (base year: 2024), from 1.54 tCO_2e per ton of sold goods in the base year to 1.24 tCO_2e per ton of sold goods in the target year	2030	No progress disclosure in first reporting year
Target of improvement of Scope 3 data quality for Category *3.1 Purchased goods* by substitution of secondary GHG emissions data with primary supplier-specific GHG emissions data for key raw materials and alloys at ESW until end of Q2 2027	2027	No progress disclosure in first reporting year
Target of improvement of Scope 3 data quality for Category *3.11 Use of sold products* by substitution of secondary GHG emissions data with primary supplier-specific GHG emissions data from key suppliers at DONAKO until end of Q2 2027	2027	No progress disclosure in first reporting year
Target of completing the roll-out of the ESG Policy in the entities VALJI, DONAKO and MCC (combined target for E1, S1, S2 and G1) until end of 2027 including training of employees	end of 2027	No progress disclosure in first reporting year

2.1.5 Metrics (ESRS E1-5, E1-6)

Energy consumption and energy mix (ESRS E1-5)

The main energy consumers at the production sites of RWH Group are the foundries and heat treatment processes. In the foundries, natural gas is predominantly used. Depending on the respective site, heat treatment processes for rolling mill rolls require significant amounts of either electrical energy or natural gas. Accordingly, the energy consumption of RWH Group consists of the use of fuels from non-renewable sources (natural gas, gasoline, diesel, heating oil, and propane) as well as the consumption of electricity for both production facilities and office buildings at the sites. The overall share of renewable sources in total energy consumption for 2025 is 46%. Corresponding measures regarding energy efficiency related to ESRS E1-5 are listed in Chapter 2.1.3, *Measures and activities (ESRS E1-3)*. The respective energy quantities are recorded in megawatt hours (MWh) based on the consumed quantities documented in the invoices of the energy service providers and are converted using applicable conversion factors. The net calorific values used to calculate energy consumption in MWh are derived, for entities located within the *European Union (EU)*, from the reporting requirements under the *EU Emissions Trading System (EU ETS)*. For MCC (US), net calorific values are based on official conversion factors published by the national energy authority (*U.S. Energy Information Administration*). Consumption of natural gas is subsequently classified in accordance with ESRS E1, AR 34 under the category *Fuel consumption from natural gas*, while consumption of gasoline, diesel and heating oil are allocated to the category *Fuel consumption from crude oil and petroleum products* in accordance with ESRS E1, AR 34, while propane is classified under the category *Fuel consumption from other fossil sources*. For the allocation of electricity consumption to the respective energy sources acc. to ESRS E1, AR 34, the electricity mix (share of each energy source in the electricity grid mix) on invoices from the electricity service providers are applied. The disclosures below therefore represent the market-based values acc. to ESRS E1, AR32 (j). A distinction is made between fossil energy sources (natural gas, coal, crude oil, and other fossil fuels), renewable energy sources (hydropower, wind, solar, biomass, geothermal and other renewable energy sources) and electricity from nuclear sources. The respective quantities are reported based on these percentage shares and the total purchased electricity in megawatt hours (MWh). The revenue of RWH Group used to calculate energy intensity is generated only from activities related to climate-intensive sectors (see the list of NACE codes in 1.2.1). Energy intensity is therefore calculated as the ratio of RWH Group's total energy consumption to the Group's total net revenue and is reported in MWh/EUR in the table "Energy consumption and energy mix" below.

46% Share of renewable sources in total energy consumption

108,796 MWh Total energy consumption

Energy consumption and energy mix	Unit	RWH Group (total)	RWH[11]	ESW	DONAKO	MCC	VALJI
Fossil fuels							
(1) Fuel consumption from coal and coal products	MWh	0		0	0	0	0
(2) Fuel consumption from crude oil and petroleum products	MWh	443		279	115	0	49
(3) Fuel consumption from natural gas	MWh	36,322		8,356	164	12,150	15,651
(4) Fuel consumption from other fossil sources	MWh	0		0	0	0	0
(5) Consumption from purchased or received electricity, heat, steam and cooling and from fossil sources	MWh	17,683		5	4,003	5,133	8,543
(6) Total consumption of fossil energy (sum of lines 1-5)	**MWh**	**54,448**		**8,640**	**4,282**	**17,283**	**24,243**
Share of fossil sources in total energy consumption	%	50%		16%	85%	83%	83%
Nuclear power							
(7) Consumption from nuclear power sources	MWh	4,779		4	0	2,772	2,003
Share of consumption from nuclear sources in total energy consumption	%	4%		< 1%	0%	13%	7%
Renewable sources							
(8) Fuel consumption for renewable sources, including biomass (also industrial and municipal waste of biological origin, biogas, hydrogen from renewable sources, etc.)	MWh	0		0	0	0	0
(9) Consumption from purchased or received electricity, heat, steam and cooling and from renewable sources	MWh	49,569		45,232	762	758	2,817
(10) Consumption of self-generated renewable energy other than fuels	MWh	0		0	0	0	0
(11) Total consumption of renewable energy (sum of lines 8-10)	**MWh**	**49,569**		**45,232**	**762**	**758**	**2,817**
Share of renewable sources in total energy consumption	%	46%		84%	15%	4%	10%
Total energy consumption (sum of lines 6, 7 and 11)	**MWh**	**108,796**		**53,876**	**5,044**	**20,814**	**29,063**
Energy intensity[12]	MWh/€	**0.00065**					

[11]Energy consumption data for RWH cannot be provided individually due to measurement issues. Energy consumption for RWH is included in the figures reported for ESW

[12]Energy intensity is calculated as the ratio of RWH Group's total energy consumption to the RWH Group's total net revenue (see Chapter *1.2.1*) in MWh/€

Gross GHG emissions (ESRS E1-6)

GHG emissions calculation for Scope 1, 2 and 3 follows the corresponding standards and guidelines of the GHG Protocol and the most recent Global Warming Potential (GWP) values published by the Intergovernmental Panel for Climate change (IPCC). On both the site- and the group-level, energy and GHG accounting follows the GHG protocol and ESRS E1 requirements.

Scope 1 GHG emissions: Scope 1 emissions include all direct greenhouse gas emissions from sources owned or controlled by the entities and are determined in accordance with the GHG Protocol. Conversion to CO_2 equivalents is conducted using specific emission factors from recognized data bases (*ecoinvent 3.11*) multiplied by the specified consumption quantities. Scope 1 includes the following categories and does not include GHG emissions from regulated emission trading schemes:

- Stationary combustion: e.g., natural gas, heating oil, liquefied petroleum gas
- Mobile combustion: e.g., Group-owned trucks and cars, forklifts

Scope 2 GHG emissions: Scope 2 GHG emissions for RWH Group arise from the generation of purchased energy consumed by the entities (in particular electricity). The calculation is based on the consumption values from the monthly or annual invoices of the respective energy service providers. Emissions are calculated according to the two approaches required by the ESRS, AR45 (d) using recognized databases and emission factors (*ecoinvent 3.11*). Scope 2 GHG emissions (location-based) represent the average GHG emissions intensity of the electricity or heating network in the respective country or region and emission factors are based on national or regional energy mix data. Scope 2 GHG emissions (market-based) reflect GHG emissions from electricity that companies have consciously chosen or are required to choose (if there is no alternative supplier) and respective emission factors are derived from contractual instruments. Regarding contractual instruments, 93% of the electricity purchased by ESW in 2025 is sourced from renewable energy and supported by Guarantees of Origin. According to supplier disclosures, 92% of this electricity originated from hydropower and 8% from other renewable sources. The remaining 7% of electricity purchased by ESW is sourced from hydroelectric power without Guarantees of Origin. At the time of reporting, no electricity in the remaining entities is purchased using contractual instruments such as Guarantees of Origin or other Renewable Energy Certificates.

Scope 3 GHG emissions: Scope 3 GHG emissions refer to all other indirect emissions within the accounting scope. Currently all relevant Scope 3 categories are disclosed, except for *3.8 Upstream leased assets*, *3.10 Processing of sold products*, *3.13 Downstream leased assets*, *3.14 Franchises* and *3.15 Investments*, as these are not applicable to RWH and its entities.

- *Category 3.1* includes all purchased goods and services in the reporting period. Regarding the purchased goods, >90% of the spend is covered including all relevant input materials and major contributors to emissions relating to purchased goods. The inputs in accordance with Chapter 2.3.4 cover the predominant share of Category 3.1. Intercompany transactions are not included in this category. The determined quantities in tons relate to the goods purchased in 2025 multiplied by the corresponding emission factors from the applied datasets using database *ecoinvent* 3.12. For purchased services, expenditure-based emission factors from the *Department for Environment, Food & Rural Affairs (DEFRA)*[13] database 2022 are allocated per site. These factors are expressed in kg CO_2e/EUR and the site-specific impact is calculated by multiplying the respective factor by the purchasing amount (EUR) of the respective service.
- *3.2 Capital goods* includes end products that are used by entities to manufacture their products for sale, storage and delivery of goods meaning tangible assets according to financial accounting such as equipment, buildings, machinery, and plants capitalized during the reporting year. Intercompany purchases are not considered in this category. Analogous to purchased services in category 3.1, the site-specific impact is calculated based on the multiplication of the expenditure-based emission factor with the purchasing value (EUR) of the capital good.
- Emissions from upstream and downstream transport (*Categories 3.4* and *3.9*) include transport of purchased goods from the suppliers to the RWH sites (upstream) and the transport routes of manufactured products from the RWH sites to the customers (downstream). Information on the origin of raw materials for key inputs (raw materials, alloys etc.) is requested directly from the suppliers. For other components within Scope 3.1, billing addresses are partially used as proxies. For Category 3.9 detailed logistics information forms the basis for the calculation of downstream transport emissions.
- The calculation of emissions for category *3.5 Waste* is based on the actual waste quantities determined at the production sites. Emissions from waste treatment are calculated based on recovery and disposal methods in accordance with Directive 2008/98/EU using the recovery certificates. These codes are fully available for the sites ESW, VALJI and DONAKO. For the MCC site a mapping of national waste treatment codes is conducted and assigned to equivalent codes in accordance with Directive 2008/98/EU. Although this approach involves minor uncertainties regarding data quality, this location generates the lowest amounts of waste within RWH Group. Waste streams that are recycled at a rate of 100% are calculated with an emission factor of 0 kg CO_2e for the recycling process (cut-off approach). In these cases, only emissions from waste collection (transport) is considered.that are recycled at a rate of 100% are calculated with an emission factor of 0 kg CO_2e for the recycling process (cut-off approach). In these cases, only emissions from waste collection (transport) is considered.
- *For 3.6 Business travel* all trips are collected by site and categorized into short haul flights, long haul flights, travel by car and travel by rail. For MCC, travel expenses are used, as data on

[13] *UK Department for Environment, Food & Rural Affairs*

distances travelled is currently not available. Therefore, CO_2 emissions are estimated using the ESW factor (tCO_2e per € of travel expenses). This factor is multiplied by the total travel expenses of MCC to calculate the estimated emissions.

- *3.7 Employee commuting* is calculated based on the weekly trips by employees between their home and workplace using a specific modal split model: Weekly trips are multiplied by 52 with vacation days and public holidays deducted per employee. Based on the modal split model a conservative calculation approach is applied for all sites assuming a rural commuting distance of 22 km one way.
- To calculate emissions from *3.11 Use of sold products* the sold quantities in tons are recorded per product type and linked to defined usage scenarios differentiating between the rolling mill rolls and rings business and the products from DONAKO. Defining robust usage scenarios for the roll and roll ring business presents a significant challenge primarily due to the wide variance in roll types and alloy combinations which result in significantly varying wear patterns. In addition, documentation of the performance of rolling mill rolls and rings at customer sites is not suitable for scenario modelling. Such data is neither standardized nor comparable as information on actual usage frequency, duration of use, or interim storage of rolls is generally not fully or identically documented. Therefore, reliable data driven modelling of usage across all product types is currently not possible. The selected scenarios are based on internal practical experience from the technical departments and are oriented toward typical usage patterns. This approach aims to provide the most realistic representation possible of product use and the associated GHG emissions. For DONAKO, representative products or components are selected for the different customer segments to define the respective usage scenarios. As an approach for each customer segment, a representative DONAKO product or component is defined based on sales data. These components are typically part of specific end products at customer sites. Accordingly, a representative "end product/plant" is determined for each customer segment to calculate the use phase emissions. Based on the defined component, product and use data, the usage phase emissions are calculated per component and segment. According to the current GHG emissions calculation this category accounts for the highest emissions within Scope 3 due to the expected long service lives and the fuels used to operate the end products in which DONAKO components are incorporated. At the same time, this category is subject to the highest level of uncertainty as it relies on extensive scenario-based assumptions. Accordingly, the improvement of data quality particularly at the DONAKO site in Category *3.11 Use of sold products* is defined as a qualitative objective under ESRS E1. The products manufactured by RWH Group are typically embedded in industrial plants and machinery, where energy consumption occurs at plant or system level and do not directly consume energy during their use phase. As such, any emissions arising during use are considered indirect emissions. Therefore, emissions from category *3.11 Use of sold products* are considered "optional" in accordance with *GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Table 5.4, p. 36)* and are presented separately in the following table.
- To calculate emissions in category *3.12 End of life of sold products*, sales volumes and packaging material are sorted by country of delivery and subsequently allocated to two disposal scenarios (scenario 1: disposal within Europe and scenario 2: disposal outside Europe). Recycling rates for disposal in and outside of Europe for sold goods made of iron and steel are taken from the Product Environmental Footprint (PEF) Annex C[14] or determined through additional research. Materials that are recycled at a rate of 100% are assessed with an emission value of 0 tCO_2e for the recycling process in accordance with the cut-off approach and only waste collection is being modelled. Emission factors for incineration and landfilling are taken from *ecoinvent* database. The evaluation of GHG emissions is finally conducted at site level by multiplying the respective emission factors for recycling, incineration, or landfill with the sold mass in tons and the corresponding treatment rates.
- RWH Group continuously strives to replace standard emission factors and database values with high-quality primary data obtained from suppliers and other partners along the value chain. Currently, the share of emissions calculated using primary data is limited to Scope 1 and Scope 2 GHG emissions related to natural gas and electricity consumption, accounting for approximately 15% of total GHG emissions (excluding the optional Scope 3 category *3.11 Use of sold products* in accordance with the GHG Protocol). At present, primary data is not yet incorporated into Scope 3 GHG emissions. RWH Group's total GHG emissions, including Scope 1, Scope 2 (both market-based and location-based) and Scope 3, are presented in the following table.

Data limitations: As stated in the descriptions of Scope 3 categories above, Scope 3 emissions are partially subject to uncertainties due to the use of expenditure-based emission factors, secondary GHG emissions datasets, proxy data and scenario-based assumptions where primary activity data is not available. Key limitations include the use of travel expenses as a proxy for business travel emissions at MCC, assumptions regarding employee commuting distances, partial reliance on supplier billing addresses as proxy for material origin for transport calculations and the modelling of product use-phase emissions based on internally developed usage scenarios.

6,683 tCO_2e	Total Scope 1 gross GHG emissions
11,447 tCO_2e	Total Scope 2 gross GHG emissions (market-based)
96,849 tCO_2e	Total Scope 3 gross GHG emissions (market-based)
114,980 tCO_2e	Total Scope 1-3 gross GHG emissions (market-based)

[14] PEF, Annex C: *Link*

Absolute emissions (in t CO_2 equivalents)	Unit	RWH Group (total)	RWH[15]	ESW	DONAKO	MCC	VALJI
Scope 1 gross GHG emissions							
Total Scope 1 gross GHG emissions	tCO_2e	**6,683**		1,586	61	2,195	2,841
Scope 2 GHG gross emissions							
Total Scope 2 gross GHG emissions (location-based)	tCO_2e	**19,287**		7,897	3,904	3,477	4,008
Total Scope 2 gross GHG emissions (market-based)	tCO_2e	**11,447**		526	1,819	3,477	5,625
Scope 3 gross GHG emissions							
3.1 Purchased goods and services	tCO_2e	**71,518**		29,123	25,693	7,443	9,259
3.2 Capital goods	tCO_2e	**2,499**		1,193	414	776	116
3.3 Fuel and energy-related activities (market-based)	tCO_2e	**7,178**		3,429	773	1,454	1,703
3.4 Upstream transportation and distribution	tCO_2e	**2,260**		823	255	182	1,000
3.5 Waste generated in operations	tCO_2e	**2,198**		1,555	289	34	321
3.6 Business travel	tCO_2e	**859**		249	464	116	29
3.7 Employee commuting	tCO_2e	**1,991**		628	767	168	428
3.8 Upstream leased assets	tCO_2e	**not material**		not material	not material	not material	not material
3.9 Downstream transportation and distribution	tCO_2e	**7,634**		4,561	657	275	2,141
3.10 Processing of sold products	tCO_2e	**not material**		not material	not material	not material	not material
3.12 End of life treatment of products	tCO_2e	**530**		333	91	46	59
3.13 Downstream leased assets	tCO_2e	**not material**		not material	not material	not material	not material
3.14 Franchises	tCO_2e	**not material**		not material	not material	not material	not material
3.15 Investments	tCO_2e	**not material**		not material	not material	not material	not material
Total Scope 3 gross GHG emissions (market-based)	tCO_2e	**96,849**		41,895	29,404	10,495	15,056
Total Scope 1-3 gross GHG emissions (location-based)[16]	tCO_2e	**122,752**		**51,310**	**33,370**	**16,168**	**21,905**
Total Scope 1-3 gross GHG emissions (market-based)[17]	tCO_2e	**114,980**		**44,006**	**31,284**	**16,168**	**23,522**
GHG emissions intensity (location-based)[18]	tCO_2e/€	**0,00074**					
GHG emissions intensity (market-based)[19]	tCO_2e/€	**0,00069**					
Scope 3 gross GHG emissions (optional category)							
3.11 Use of sold products (optional acc. to GHG Protocol)		**101,274,485**		1,089	101,272,995	167	234

[15] GHG emissions for RWH cannot be provided individually due to measurement issues. GHG emissions for RWH is included in the figures reported for ESW

[16] Excluding the optional category *3.11 Use of sold products* according to GHG Protocol

[17] Excluding the optional category *3.11 Use of sold products* according to GHG Protocol

[18] Emissions intensity (location-based) is calculated as the ratio of RWH Group's total GHG emissions (excl. category *3.11 Use of sold products*) to RWH Group's total net revenue (see Chapter 1.2.1) in tCO_2e/EUR

[19] Emissions intensity (market-based) is calculated as the ratio of RWH Group's total GHG emissions (excl. category *3.11 Use of sold products*) to RWH Group's total net revenue (see Chapter 1.2.1) in tCO_2e/EUR

2.2 E2 – Pollution

2.2.1 Material IROs (ESRS 2 SBM-3)

Material impacts (Inside-Out)

ESRS topic	Impact description	Actual/Potential Positive/Negative	Time horizon	Causation/ Localization
Substances of high and very high concern	Danger to human health if substances of high and very high concern are stored and handled improperly	potential negative	short-term	own sites
	Potential negative effects on the local environment if substances of concern and very high concern are handled and used improperly (e.g., inadequate storage or disposal)	potential negative	short-term	own sites

2.2.2 Management of material IROs (ESRS 2 SBM-2, IRO-1, E2-1, E2-2)

Description of procedures for the identification and assessment of significant impacts, risks and opportunities (ESRS 2 IRO-1)

Detailed information on how we identified and assessed IROs in connection with E2 can be found in Chapter *1.3*. Environmental management systems reports in accordance with ISO14001, alongside corresponding risk analyses and results of pollutant measurements for air and water emissions, were central to identify and assess IROs related to environmental topic E2.

According to the results of the DMA, substances of concern (SoC) and substances of very high concern (SVHC) in accordance with ESRS E2-5 were assessed as material. This materiality stems from their use in production processes across all sites and their sourcing from the upstream value chain. In contrast, the relevance of SoC and SVHC is not primarily linked to substances contained in the final products placed on the market by the RWH Group. The products manufactured by the RWH entities qualify as "articles" within the meaning of the REACH Regulation (*Regulation (EC) 1907/2006 (REACH)*), while primary metals and alloys used by the Group are classified as "substances or mixtures" under REACH. Based on the identified quantities of SoC and SVHC incorporated into or applied to these "articles", it has been determined that no disclosure obligations arise under Article 7(2)(a) and (b) of the REACH Regulation. Nevertheless, RWH Group fulfils its obligations both as a manufacturer and as a downstream user of auxiliary and operating materials that contain SoC and SVHC. This includes the continuous review of auxiliary and operating materials, as well as alloys with regard to potential changes in substance composition, updates to the ECHA candidate list, and restrictions or authorization requirements under Annex XIV and Annex XVII of the REACH Regulation.

Regarding ESRS E2-4 Pollution of air, water and soil, IROs have been identified in the IRO long list but were finally not assessed as material in the IRO short list, as current environmental management processes and regular mandatory emission measurements and inspections are considered effective in limiting and controlling potential pollution-related impacts.

Policies, strategies and concepts (ESRS E2-1)

The management of IROs regarding SoC and SVHC within RWH Group is currently not governed through a dedicated group-wide policy. Chemicals management is implemented at local entity level by the respective environmental management departments in accordance with applicable national legal requirements and operational entity-specific conditions supported through internal controls as well as external audits within the framework of the ISO14001 management systems currently implemented at ESW, VALJI and DONAKO. Within the ISO14001 framework, the respective local *Corporate Mission Statements* serve as the local policy. At MCC, the management of IROs in connection with SoC and SVHC is conducted following internal procedures (see details below). At DONAKO aspects relating to the handling of hazardous substances are additionally managed within the ISO45001 certified occupational health and safety management system, particularly regarding employee protection, risk assessments, operational procedures and training.

Local procedures, operational instructions and safety documentation govern topics such as the handling, storage, use and monitoring of SoC and SVHC as well as related compliance obligations. Relevant employee groups are provided with access to applicable

operating instructions and safety data sheets and receive regular training regarding the handling of hazardous substances. Due to the different operational conditions across the entities, RWH Group currently does not plan to establish a centralized group-wide chemicals policy and management framework and intends to continue managing these topics locally within the entities. Only alignment of data collection and consolidation of disclosures regarding SoC and SVHC in accordance with ESRS 2 will be continuously conducted at group level by the RWH ESG & CSR Management in cooperation with the local ESG coordinators following the requirements of the consolidated sustainability statement. Currently, the disclosure requirements in Chapter *2.2.4* do not include the entity MCC due to limited data availability related to SoC and SVHC as stated in the section *Data limitations* in the respective chapter.

Environmental Management System (ISO14001) (at ESW, VALJI and DONAKO): The management of IROs in relation to ESRS E2 is primarily implemented through ISO14001-certified environmental management systems at ESW, DONAKO and VALJI. These systems ensure structured processes, defined responsibilities, and continuous improvement in the management of environmental impacts, risks and opportunities across the sites. No ISO14001-certified environmental management system is currently implemented at MCC. SoC/SVHC management at MCC is organized through dedicated responsibilities and processes at the site.

Occupational Health and Safety Management System (ISO45001) (at DONAKO): The DONAKO site is additionally certified in accordance with ISO45001. At this site, substances of concern and substances of very high concern are directly used in production processes, particularly paints, varnishes, and coatings. Accordingly, the safe handling, storage and implementation of appropriate protective measures are of particular relevance at this site (see also Chapter *3.1.4, Subtopic: Working conditions*).

Measures and activities (ESRS E2-2)

Continuous chemicals management: The continuous maintenance and updating of lists of hazardous substances and associated safety data sheets are carried out by the local chemicals management or environmental management departments at the entities ESW, VALJI and DONAKO and forms an important ongoing measure in regard to E2. These are reviewed and updated annually as part of evaluation of relevant materials for the metrics under ESRS E2. All relevant technical information regarding the products of RWH Group is communicated directly to customers (e.g., roll inspection certificates). The inclusion of SoC/SHVC metrics of MCC for the next reporting year forms an additional measure conducted in 2026.

Continuous health and safety management: This ongoing measure focuses on the continuous improvement and further development of these systems across all entities (see also Chapter *3.1.4, Working conditions*). As improper handling of substances of concern (SoC) and substances of very high concern (SVHC) may lead to acute and severe health impacts on employees, health and safety management systems and processes are implemented at all sites, while only being certified in accordance with ISO45001 at DONAKO. Designated health & safety officers define measures for the safe handling and storage of SoC and SVHC and communicate these measures to employees in accordance with applicable local legal requirements. This includes, for example, mandatory personal protective equipment (e.g., eye, mouth, and respiratory protection) for specific activities and workplaces, as well as clearly defined requirements and procedures in the event of emissions of Soc/SVHC to air, water, or soil).

For the implementation of the action plan and corresponding measures defined for ESRS E2 it is not required to allocate significant additional financial resources in future periods compared to the financial resources already allocated in the reporting period.

2.2.3 Targets (ESRS E2-3)

In accordance with ESRS requirements, targets are generally expected to be measurable, outcome-oriented, and time-bound in order to assess progress on material sustainability matters. For the material topics under ESRS E2, RWH Group has currently only defined qualitative targets. This approach reflects the nature of the identified impacts, risks and opportunities, which are primarily managed through compliance-based processes, operational controls, and management systems rather than through quantitative metrics. RWH continues to evaluate the appropriateness of introducing measurable targets for ESRS E2-5 in the future. The Group aims to continuously improve the quality, consistency and transparency of data related to substances of concern (SoC) and substances of very high concern (SVHC) at its sites. This includes the ongoing enhancement and further development of centralized data collection in connection with ESRS E2-5, as well as the systematic monitoring of quantities across all entities (additionally including MCC as stated in *Measures and activities (ESRS E2-2)*. The Group aims to ensure continuous compliance with applicable legal and regulatory requirements related to SoC and SVHC at its sites. This objective is supported by ongoing legal monitoring and regular reviews of substances used, taking into account updates to the REACH Candidate List as well as restrictions and authorization requirements under Annex XIV and Annex XVII of the REACH Regulation.

Targets

Target	Target (year)	Note
Target of zero cases of confirmed violation of SoC/SVHC legislation	2026 and continuous	No progress disclosure in first reporting year

2.2.4 Metrics (ESRS E2-4)

Substances of concern and substances of very high concern (ESRS E2-5)

The definition of SoC and SVHC is set out in Annex II of the ESRS. Substances of concern, as defined under the ESRS, Annex II, Table 2, are substances that meet the criteria laid down in Article 57 and are identified in accordance with Article 59 (1) of Regulation (EC) No 1907/2006 (REACH), and that are classified in Part 3 of Annex VI to Regulation (EC) No 1272/2008 (CLP Regulation) under one or more of the specified hazard classes or hazard categories (see tables below). Substances of very high concern are defined as substances that meet the criteria laid down in Article 57 of Regulation (EC) No 1907/2006 (REACH) and have been identified in accordance with Article 59 (1) of that Regulation using the ECHA candidate list.

Substances/materials containing SoC and/or SVHC are identified based on the hazard statements/categories derived from the safety data sheets (SDS) that are filed and maintained in the entities' chemical inventories. The quantity of a specific SoC or SVHC in a chemical substance, mixture or material is determined based on its percentage concentration stated in the SDS (generally stated in section *3.2 Mixtures* within SDS) provided by the suppliers. The total input quantity of SoC/SVHC (in metric tons) represents the absolute value of SoC/SVHC, irrespective of whether a SoC/SVHC falls into more than one hazardous class/category. A breakdown of SoC and SVHC quantities by hazard class/category is provided in the following tables, presented separately for SoC and SVHC. The predominant share of SoC/SVHC used at RWH Group sites does not leave the entities as products, or parts of products. This is because the majority of the disclosed quantities at foundry sites arise from auxiliary and operating materials, such as molding materials used in the foundries, which partially remain within the sites due to internal recycling processes or are handed over to designated waste service providers (see hazardous waste volumes in Chapter 2.3.4) and therefore do not leave the Group as products or parts of products as defined in disclosure requirements E2-5. The substances of concern that are used as input material in metallurgical processes (e.g., alloys) become permanently bound within the material matrix and lose hazardous properties of the specific substance/mixture in the final product or "article" according to REACH. In general, processes such as drying, curing or polymerization, hazardous solvents or binders either chemically react or evaporate during the application, so that no significant hazardous substances remain in or on the final product regarding paintings, coating, and varnishing processes at DONAKO. Accordingly, only SoC and SVHC inputs are disclosed in this metric, representing the proportion of SoC/SVHC in the quantities procured during the reporting period.

Data limitations: The quantities of SoC and SVHC are based on the weights of the respective materials recorded through goods receipt notes in the ERP systems, therefore representing purchases and not actual consumption. Therefore, the metrics in the table represent an approximation. Due to limited data availability related to hazardous substances, the respective quantities of SoC/SVHC of the entity MCC are not included at this stage, resulting in reduced data completeness. Based on the overall production output of the foundry sites ESW, VALJI and MCC, approximately 10% is attributable to the latter. Against this background, it can be assumed that the current exclusion does have a limited impact on the overall amount of SoC/SVHC reported for RWH Group. Nevertheless, the objective is to include the respective volumes of MCC in the next reporting year.

570.87 t	Total quantity of SoC (t)
52.19 t	Total quantity of SVHC (t)

Substances of concern (SoCs) according to hazard classes of RWH Group (total)	Hazard statement	Input (t)[20]
Skin Sensitization 1, 1A, 1B	H317	**337.18**
Respiratory Sensitization 1, 1A, 1B	H334	**0.48**
Germ cell mutagenicity 1A, 1B	H340	**0.00**
Germ cell mutagenicity 2	H341	**0.48**
Carcinogenicity 1A, 1B	H350, H350i	**0.48**
Carcinogenicity 2	H351	**358.03**
Reproductive toxicity 1A, 1B	H360, H360D, H360F, H360FD	**52.59**
Reproductive toxicity 2	H361, H361d, H361f, H361fd	**0.25**
Specific target organ toxicity (single exposure) 2	H371	**<0.01**
Specific target organ toxicity (repeated exposure) 1	H372	**488.70**
Specific target organ toxicity (repeated exposure) 2	H373	**25.42**
Hazardous to the aquatic environment, long-term hazard 1	H410	**1.42**
Hazardous to the aquatic environment, long-term hazard 2	H411	**1.27**
Hazardous to the aquatic environment, long-term hazard 3	H412	**1.47**
Hazardous to the aquatic environment, long-term hazard 4	H413	**0.58**
Total quantity of SoC (t)		**570.87**

Substances of very high concern (SVHC) according to hazard classes of RWH Group (total)	Hazard statement	Input (t)
Skin Sensitization 1, 1A, 1B	H317	**0.09**
Respiratory Sensitization 1, 1A, 1B	H334	**<0.01**
Reproductive toxicity 1A, 1B	H360, H360D, H360F, H360FD	**52.11**
Hazardous to the aquatic environment, long-term hazard 1	H410	**<0.01**
Hazardous to the aquatic environment, long-term hazard 3	H412	**0.08**
Total quantity of SVHC (t)		**52.19**

[20] Values are rounded to two decimal places; values lower than 0,01 are presented as "<0.01"

2.3 E5 – Circular economy

2.3.1 Material IROs (ESRS 2 SBM-3)

Material impacts (Inside-Out)

ESRS topic	Impact description	Actual/Potential Positive/Negative	Time horizon	Causation/ Localization
Resource inflows, including resource use	High Scope 3 GHG emissions from the purchase of raw materials with a significant negative impact on climate change Note: this impact is material for G1, E1 and E5 in Chapters *2.1.1*, *2.3.1* and *4.1.1*)	actual negative	long-term	value chain
Waste	Resource-intensive production generates substantial amounts of waste, which has a negative impact on the environment due to downstream processing and disposal.	actual negative	short-term	own sites

Material risks and opportunities (Outside-In)

ESRS topic	Risk/opportunity description	Risk/Opportunity	Time horizon	Causation/ Localization
Resource inflows, including resource use	Risk of production disruptions and increased costs due to shortages in the supply of raw materials, consumables, and operating supplies across production sites, primarily driven by climate change impacts and natural hazards affecting extraction, production, and transportation processes within global supply chains	risk	medium-term	value chain
	Risk of supply bottlenecks, price volatility, and logistical constraints in the scrap market in the medium term, driven by rising export volumes and increasing global demand, potentially leading to intensified competition for available quantities	risk	medium-term	value chain
Waste	Opportunity to reduce dependency on primary raw materials and achieve positive financial effects through the extensive use of recycled and secondary materials in production	opportunity	medium-term	own sites
	Risk of increased operating costs and reduced profitability due to increasing waste disposal and treatment costs.	risk	medium-term	own sites
	Risk of administrative penalties, legal consequences, and reputational damage resulting from improper storage, handling, or disposal of waste.	risk	medium-term	own sites

2.3.2 Management of material IROs (ESRS 2 SBM-2, IRO-1, E5-1, E5-2)

Description of procedures for the identification and assessment of significant climate-related impacts, risks and opportunities (ESRS 2 IRO-1)

The approach for identifying and assessing impacts, risks, and opportunities regarding resource use and circular economy in E5 is integrated into the DMA process described in detail in Chapter 1.3. For the specific E5 assessment, the environmental management systems (ISO14001), local waste and materials management systems, site-specific risk analyses, and internal monitoring of material and waste streams were of central importance.

Policies, strategies and concepts (ESRS E5-1)

Within the RWH Group, operational responsibilities and processes related to ESRS E5 are managed decentrally at the entity level to effectively address site-specific resource use and circular economy matters. Consequently, rather than a single standalone Group policy related to E5, topic-specific governance is embedded within the entities' local operational frameworks. Central coordination is provided by the RWH ESG & CSR Management regarding harmonized ESG data collection methodologies and consolidation of the disclosure requirements under E5 in cooperation with local ESG coordinators.

Operational implementation and management systems: At ESW, VALJI and DONAKO, resource-related processes in E5 are governed through ISO14001-certified environmental management systems, supported by local procedural instructions and standard operating procedures. The respective local *Corporate Mission Statements* serve as the local environmental policy. These processes support the management of resource inflows, recycling activities, waste handling and the use of secondary materials. In this context, waste management practices are aligned with applicable legal requirements and the waste hierarchy pursuant to Directive 2008/98/EC (Article 4), including requirements regarding the compliant handling, temporary storage and disposal of hazardous and non-hazardous waste as well as the commissioning of licensed and authorized disposal companies. No ISO14001 system is currently implemented at MCC. Instead, E5-related topics are managed through dedicated responsibilities and operational procedures within the entity. Regarding waste management, respective volumes are collected and separated in accordance with local regulatory requirements in the State of Pennsylvania, distinguishing between residual and hazardous waste and is transferred to local disposal companies for appropriate treatment according to regulatory requirements.

Overarching ESG Framework: To gradually harmonize sustainability governance, an overarching ESG Policy has been developed (as described in Chapter 2.1.3). Currently implemented at ESW, this policy builds upon the entities' *Corporate Mission Statements*. Upon its group-wide roll-out, it will formalize general ESG commitments across the RWH Group, including E5 topics such as energy efficiency, waste management, the utilization of recycled materials, and the mitigation of supply chain risks.

Measures and activities (ESRS E5-2)

To address its material impacts, risks and opportunities related to resource use and circular economy, RWH Group has implemented and is continuously developing a set of operational and strategic measures aimed at ensuring the efficient use of raw materials, strengthening circular material flows, and mitigating supply-related risks across its own operations and along the value chain. For the implementation of the action plan and corresponding measures defined for ESRS E5 it is not required to allocate significant additional financial resources in future periods compared to the financial resources already allocated in the reporting period.

Continuous monitoring and management of scrap rates (at ESW and VALJI)[21]: A key measure constitutes the continuous maintenance and implementation of quality management processes aimed at maintaining the scrap rate in line with the annually agreed entity-specific scrap rate targets. "Scrap rate" in this context refers to production scrap resulting from defective products (e.g. due to manufacturing errors) and must not be confused with "scrap rate" as the share of reused or recycled secondary components, products or materials used to manufacture the Group's products disclosed in Chapter 2.3.4. Each occurring scrap incident is systematically analyzed and, where necessary, corrective and preventive actions are implemented to minimize the risk of recurrence. This is essential to prevent increased material demand resulting from higher scrap rates. Scrap rates are continuously measured and monitored through the respective ERP systems in the entities.

[21] "Scrap rate" in this context refers to production scrap resulting from defective products (e.g. due to manufacturing errors) and does not refer to the "scrap rate" as share of reused or recycled secondary components, products or materials used in the manufacture of the Group's products as disclosed in chapter 2.3.4.

Continuous management of the share of secondary raw materials in rolling mill rolls production (at ESW and VALJI): The use of internal production scrap and externally sourced scrap constitutes a continuous measure to manage the demand for primary raw materials. By continuously maintaining the share of reused or recycled secondary components used in the manufacture of the Group's products by approx. 70-75% (including external sourced scrap and internal production scrap according to the target in Chapter *2.3.3*) for rolling mill rolls production at ESW and VALJI, the Group maintains a constant reliance on primary raw material inputs and supports circular material flows within production processes (see current share in Chapter *2.3.4*). This is managed continuously within these entities through material-specific separation of the scrap for targeted reintegration into the casting process and is monitored through the respective ERP systems in the entities.

Continuous waste management (at all sites): All entities continuously follow their local waste management processes to ensure compliance with applicable regulatory requirements related to waste handling and disposal in the respective country of the entity. Continuous measures include the proper segregation, storage and disposal of waste in accordance with statutory provisions and the monitoring of waste volumes and waste streams including reporting to officials.

R&D and application partnerships (at ESW): ESW's research and development department plays a central role in advancing sustainable material solutions that minimize resource use, extend product life cycles, and support circularity across the value chain. The development work increasingly focuses on material efficiency, low impact alloy concepts, and the responsible use of critical raw materials. A key pillar of this approach is the establishment of application partnerships with customers. These collaborations enable products to be installed, monitored and optimized under real operating conditions directly at customer sites. Such joint projects allow rapid data driven improvements and ensure that new solutions deliver measurable benefits in practice. By developing highly wear resistant materials with significantly extended service life, ESW contributes directly to reducing material consumption, cutting replacement frequency, and lowering energy and GHG emissions associated with production and logistics. This leads to tangible resource savings for customers and strengthens sustainability performance across the downstream value chain. In addition, R&D increasingly integrates principles of the circular economy such as maximizing yield in production, lowering scrap rates, optimizing recycling of metallic by-products, and evaluating re manufacturing routes for used components. These initiatives support responsible material management and help reduce waste and environmental impact throughout the product life cycle.

Implementation of a raw material risk analyses process to mitigate supply chain risks (at ESW): A measure currently being initiated by the Group to systematically address raw material-related risks and dependencies is the development of a structured raw material risk analysis tool and methodology, which is currently being piloted at the entity ESW in collaboration between RWH ESG & CSR Management and Procurement (ESW) (see detailed description of the raw material risk analysis process in Chapter *4.1.3*). Within the context of ESRS E5, this measure should support the identification and management of risks related to material inflows, particularly risks arising from dependencies on individual suppliers, regions or countries of origin of raw materials, as well as country-specific ESG risks associated with the raw materials. The final analysis tool, which is planned as a separate assessment tool complementing supplier evaluations, is intended to support procurement-related decision-making, increase transparency regarding critical raw material dependencies and origin, and enable the prioritization of mitigation measures within the sourcing process. The current pilot phase at ESW, initiated in 2025 and expected to be completed by the end of 2026, is intended to evaluate the data availability, effectiveness and applicability of the methodology in order to establish a robust risk analysis tool prior to the planned roll-out to additional entities within the Group in 2027. The described risk assessment approach should also contribute to the identification of potential risks related to governance aspects within the upstream value chain. Further information regarding these aspects is provided in the related disclosures under ESRS G1 in Chapter *4.1.3*.

Continuous Improvement Process (CIP) (at all sites): CIP promotes the submission of ideas and improvement proposals through dedicated process within the entities (see also Chapter *3.1.3*). These suggestions can contribute to measurable efficiency gains, resource use or waste reductions and can subsequently generate significant cost savings for the Group and respective entities.

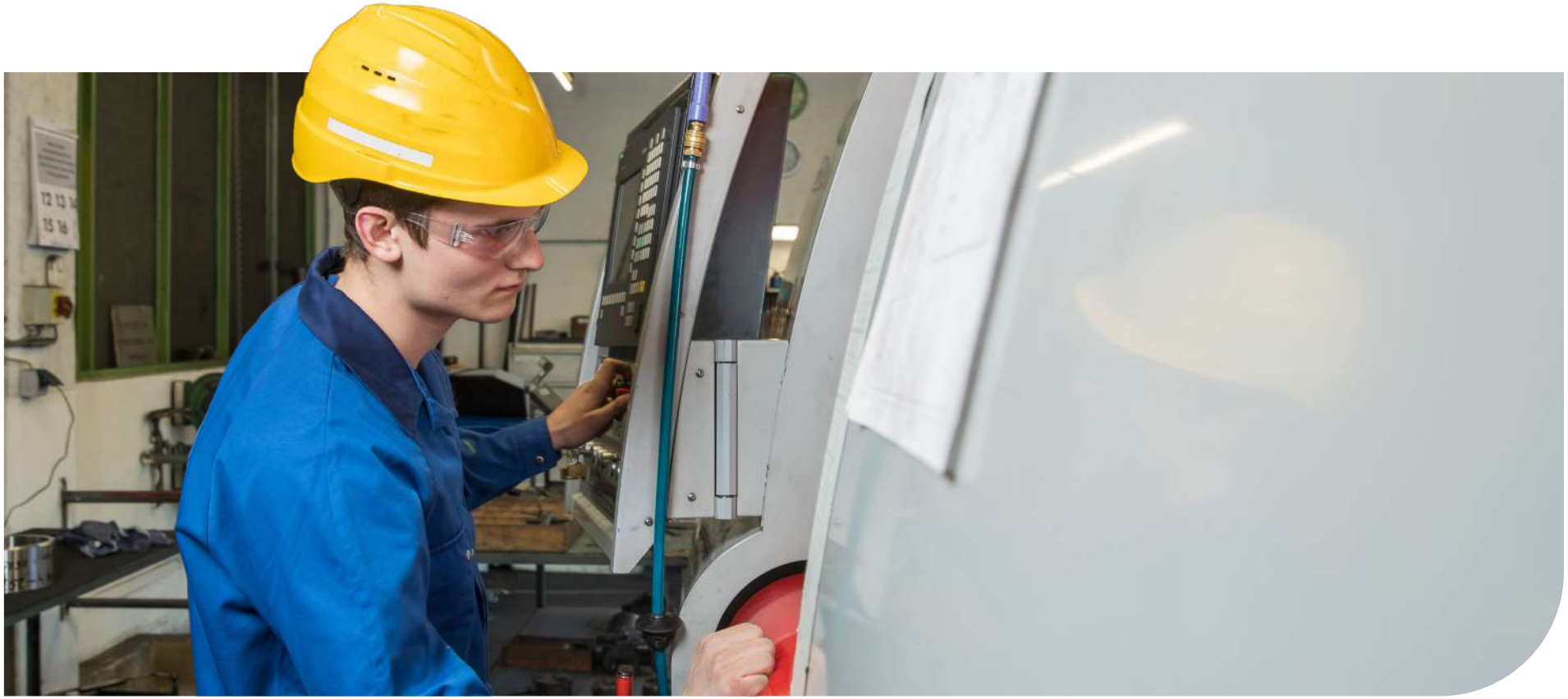
Local environmental reports and monitoring (at ESW and VALJI): At the sites ESW and VALJI additional internal environmental reports are regularly prepared by the local environmental management departments on an annual basis and represent an ongoing measure to ensure tight monitoring of key performance indicators related to energy consumption, material use, and waste generation, thereby supporting the early identification and effective management of material IROs.

2.3.3 Targets (ESRS E5-3)

The targets related to scrap usage apply to the two primary foundry sites ESW and VALJI. Maintaining a high scrap usage rate through externally sourced scrap and internally recycled material makes a significant contribution to reducing the use of primary raw material. The target is voluntary and reflects the Group's long-standing practice in circular material use. The share of secondary raw material is monitored through the respective ERP systems in the entities. Regarding waste, no voluntary targets have currently been defined for RWH. While waste management is addressed through compliance with applicable legal requirements and continuous re-certification of the environmental management systems, the derivation of further strategic and voluntary targets based on the commitment to the principle of circularity has not yet been completed.

Targets

Target	Target (year)	Note
Target of maintaining the average share of secondary raw materials in foundries at ESW and VALJI at 70-75% (including externally purchased scrap and internal production scrap in relation to total foundry input)	2026 and continuous	No progress disclosure in first reporting year



2.3.4 Metrics (ESRS E5-4, E5-5)

Resource inflows (ESRS E5-4)

Used materials excl. water: The main raw material inputs for the manufacture of rolling mill rolls and rings, as well as for the production of components and products at DONAKO, include primary materials such as pig iron and alloying elements (e.g. chromium, molybdenum, vanadium, nickel etc.), scrap and semi-finished products (e.g. electrical steel sheets), with the latter being used in particular at the DONAKO site. In addition, a variety of tools and consumables (e.g., grinding wheels, paints, varnishes), foundry auxiliaries (e.g., inoculants), and packaging materials (e.g., wooden boxes, steel skids, corrosion protection films) are used. The largest share of material inputs relates to raw materials (pig iron), alloys and scrap. Due to confidentiality reasons and considering the competitive sensitivity of product composition data, material inflows are disclosed only on a consolidated level for RWH Group, categorized by material type. A disaggregation by individual entities is currently not provided.

Data limitations

The quantities of resource inflows reported are based on the weights recorded through goods receipt notes in the ERP systems. Therefore, the metrics in the table represent an approximation based on material purchases and do not reflect the actual material consumption within the entities. No significant amount of biological material is used in manufacturing the Group's products.

Entity metrics covering ESW and VALJI: The amount and share of reused or recycled secondary components, products or materials used in the manufacture of the Group's products and services in the table represent actual consumption data based on the melt input derived from the ERP systems and includes consumption quantities of externally sourced scrap as well as used internal production scrap.

Data limitations

These values currently include consumption quantities from ESW and VALJI only and are therefore separated in table, as internal scrap use is not yet tracked consistently at MCC, resulting in data quality uncertainties. Based on the overall production output of the foundry sites ESW, VALJI and MCC, approximately 10% is attributable to the latter. Against this background, it can be assumed that the current exclusion has a limited impact on the overall result. At DONAKO, occurring scrap during production is primarily sold to external scrap merchants and is also not considered a relevant input and therefore not included within this metric. For the consistency of this KPI, the denominator of the percentage indicator required under paragraphs 31(c) regarding the share of reused or recycled secondary components, products or materials used in the manufacture of the Group's products and services in the bottom line of the table, represents the overall total weight of materials used during the reporting period at the foundry sites ESW and VALJI (see also Footnotes *22* and *23*).

Used materials excl. water	Unit	RWH Group (total)
Raw material	t	9,680
Alloys	t	2,632
Scrap (externally sourced)	t	19,209
Semi-finished products	t	7,407
Tools/consumables	t	421
Foundry auxiliaries	t	4,195
Packaging		480
Total	t	**44,024**
Entity metrics covering ESW and VALJI		
Amount of reused or recycled secondary components, products or materials used in the manufacture of the Group's products and services (including use of externally sourced scrap and internal production scrap)[22]	t	**28,580**
Share of reused or recycled secondary components, products or materials used in the manufacture of the Group's products and services (including use of externally sourced scrap and internal production scrap)[23]	%	**71**

[22]The value only considers the quantities of externally sources scrap and internal recycling material at the sites ESW and VALJI

[23]To ensure the consistency of the KPI, the percentage value only includes the consumption of externally sourced secondary material (scrap) and internal recycled material from the sites ESW and VALJI as the numerator, and only the total material consumption (primary and recycled material) of ESW and VALJI as the denominator.

Waste (ESRS E5-5)

Waste generated at RWH and its entities is disposed of through licensed contractors. Waste is categorized in accordance with applicable national legal requirements. All metrics presented in the table "Waste" are based on direct weight measurements. The quantity of each waste shipment leaving RWH Group's production sites is measured and documented on invoices/waste collection receipts. Depending on the respective entity, waste quantities for the reporting period are either derived from entity-specific waste reports obtained from national waste platforms (e.g., at DONAKO and VALJI) or from internal ERP system waste report (at MCC and ESW). The recovery or disposal of waste is assessed based on the operation codes according to *Directive 2009/98/EC Annex I and II* provided by the contractors. These codes are either automatically evaluated via reports of the national waste platforms, or the respective data is obtained through direct coordination with waste disposal contractors. For the MCC site, no waste operation codes acc. to *Directive 2009/98EC Annexes I and II* are available. The recovery and disposal methods are instead derived from the Residual Waste Biennial Report submitted to the *Pennsylvania Department of Environmental Protection*. Based on the information provided in this report, waste streams are assigned to corresponding recovery or disposal categories (e.g., recycling, landfill, incineration). For internal control purposes, waste volumes of the entities are reconciled with the prior-year figures and reviewed for plausibility and consistency. Waste is presented in the table "Waste" below in the two main categories of *Waste diverted from disposal (recovery)* and *Waste directed to disposal (disposal)* and additionally broken down into hazardous and non-hazardous waste. Quantities and percentage values are rounded to whole numbers.

Waste	Unit	RWH Group (total)	RWH[24]	ESW	DONAKO	MCC	VALJI
Total waste generated	**t**	**12,734**		**5,247**	**5,360**	**337**	**1,789**
Total waste diverted from disposal (recovery)	t	**11,830**		**4,885**	**5,282**	**0,28**	**1,663**
Hazardous waste diverted from disposal	t	**727**		**706**	**19**	**0,30**	**1**
Hazardous waste preparation for reuse	t	0		0	0	0	0
Hazardous waste recycling	t	3		0	3	0	0
Hazardous waste other recovery operations	t	724		706	16	0,30	1
Non-hazardous waste diverted from disposal	t	**11,103**		**4,178**	**5,263**	**0**	**1,662**
Non-hazardous waste preparation for reuse	t	0		0	0	0	0
Non-hazardous waste recycling	t	10,317		3,519	5 241	0	1,557
Non-hazardous waste other recovery operations	t	786		659	22	0	105
Total waste directed to disposal (Disposal)	**t**	**904**		**362**	**78**	**337**	**126**
Hazardous waste directed to disposal	t	**249**		40	78	12	118
Hazardous waste incineration	t	**8**		0	5	0	3
Hazardous waste landfill	t	**0**		0	0	0	0
Hazardous waste other disposal operations	t	**241**		40	73	12	115
Non-hazardous waste directed to disposal	t	**655**		**322**	**0**	**325**	**8**
Non-hazardous waste incineration	t	0		0	0	0	0
Non-hazardous waste landfill	t	655		322	0	325	7
Non-hazardous waste other disposal operations	t	0,50		0	0	0	0,50
Percentage of non-recycled waste	**%**	**7%**		**7%**	**1%**	**100%**	**7%**
Total amount of non-recycled waste	**t**	**904**		**363**	**78**	**337**	**126**
Total amount of hazardous waste	**t**	**975**		**747**	**97**	**12**	**119**

[24]Waste amounts for RWH cannot be provided individually due to measurement issues. Waste amounts for RWH is included in the figures reported for ESW

3 Social

3.1 S1 – Own Workforce

3.1.1 Material IROs (ESRS 2 SBM-3)

3.1.2 Interaction with strategy and business model (ESRS 2 SBM-3)

3.1.3 Involvement of affected stakeholders (ESRS 2 SBM-2, ESRS S1-2)

3.1.4 Management of material IROs (ESRS S1-1, ESRS S1-3, ESRS S1-4)

3.1.5 Targets (ESRS S1-5)

3.1.6 Metrics (ESRS S1-6 to S1-17)

3.2 S2 – Workers In The Value Chain

3.2.1 Material IROs (ESRS 2 SBM-3)

3.2.2 Interaction with strategy and business model (ESRS 2 SBM-3)

3.2.3 Involvement of affected stakeholders (ESRS 2 SBM-2, S2-2)

3.2.4 Management of material IROs (ESRS S2-1)

3.2.5 Targets (ESRS S2-5)

3.1 S1 – Own workforce

3.1.1 Material IROs (ESRS 2 SBM-3)

Material impacts (Inside-Out)

ESRS topic	Impact description	Actual/Potential Positive/Negative	Time horizon	Causation/ Localization
Working conditions ↗ Health and Safety ↗ Secure employment ↗ Collective bargaining agreements ↗ Freedom of association	Work-related injuries, accidents, and acute or chronic health impacts in case of insufficient compliance with occupational health and safety standards.	actual negative	short-term	own sites
	Serious workplace accidents and injuries due to inadequate maintenance or delayed repairs of machinery and equipment.	actual negative	short-term	own sites
	Potential increased physical strain and health impacts on employees due to inadequate workplace temperatures in summer and winter, with effects exacerbated by climate change.	potential negative	short-term	own sites
	Failure to comply with legal requirements on employee representation and collective bargaining may result in negative impacts on employees' interests and working conditions and may cause reputational damage.	potential negative	long-term	own sites
Equal treatment and opportunities for all ↗ Gender equality and equal pay for work of equal value ↗ Measures against violence and harassment in the workplace ↗ Training and skills development	Inequalities in pay or insufficient measures to promote equal opportunities may foster discriminatory structures and place psychological strain on disadvantaged groups within the Group. This contradicts the Group's values and negatively affects employees' well-being, motivation, and engagement.	potential negative	short-term	own sites
	Targeted training and skills development of employees contribute to the Group's long-term competitiveness and innovative capacity. By strengthening qualifications and knowledge, the Group can improve individual performance as well as employee motivation and satisfaction.	actual positive	long-term	own sites

Material risks and opportunities (Outside-In)

ESRS topic	Risk/opportunity description	Risk/ Opportunity	Time horizon	Causation/ Localization
Working conditions ↗ Health and Safety ↗ Collective bargaining agreements	Non or insufficient compliance with occupational health and safety regulations may result in fines or sanctions from authorities and reputational damage.	risk	medium-term	own sites
	Failure to regularly maintain machinery and equipment, or to carry out necessary repairs, increases the risk of workplace accidents, potentially leading to significant financial consequences and reputational damage for the Group.	risk	medium-term	own sites
	High wage settlements in collective bargaining agreements driven by elevated inflation, increase personnel costs, as well as substantial increase in national minimum wage levels, can significantly impact on the Group's financial position.	risk	medium-term	own sites
Adequate wages	Strong local competition for workers at individual sites can result in increased staff turnover and high costs for recruitment, onboarding and training of new employees.	risk	medium-term	own sites
Equal treatment and opportunities for all ↗ Measures against violence and harassment in the workplace ↗ Training and skills development	A safe, healthy, and respectful working environment is a key prerequisite for quality and efficiency. Violence or harassment in the workplace not only endanger the well-being of affected employees, but also undermine trust, cooperation, and pose a risk for the overall organizational stability.	risk	medium-term	own sites
	Targeted training and skills development of employees contribute to the Group's long-term competitiveness and innovative capacity. By strengthening qualifications and knowledge, the Group can improve individual performance as well as employee motivation and satisfaction.	opportunity	medium-term	own sites
	Investments in apprenticeship programs and continuous training and skills development opportunities for employees strengthen expertise and know-how within the Group, supporting long-term workforce development and organizational resilience.	opportunity	long-term	own sites

3.1.2 Interaction with strategy and business model (ESRS 2 SBM-3)

RWH Group, as an employer of more than 800 people, considers a healthy, qualified, and motivated workforce as a central pillar of its business and long-term competitiveness. The workforce of the RWH Group consists of blue-collar and white-collar employees, apprentices, as well as non-employees[25]. With regard to non-employees, the Group makes use of the phase-in option in accordance with the ESRS 1, 10.4 and therefore does not disclose non-employee metrics related to ESRS S1-7 in the first reporting year (see Chapter *3.1.6*). Material impacts, risk and opportunities stated above apply to the whole workforce of the Group. Regarding health and safety of employees, the Group recognizes that non-compliance with occupational health and safety regulations or insufficient maintenance does not only endanger employee health but also poses a direct threat to production stability, product quality, and regulatory standing. While the current workforce includes both blue- and white-collar employees, production-related roles face a higher inherent risk of physical hazards. Consequently, maintaining high safety standards is an integral part of the operational health & safety management. Regarding equal treatment, the Group acknowledges that any failure to ensure a non-discriminatory environment directly affects employee well-being and productivity and exposes the organization to reputational damage and legal risks. Due to the geographical location of the Group's operations and the strict applicable regulatory frameworks, there is no significant risk of forced, compulsory, or child labor at the Group's sites and therefore these matters are not considered material.

3.1.3 Involvement of affected stakeholders (ESRS 2 SBM-2, ESRS S1-2)

Overall responsibility for employee engagement and the integration of feedback into strategic and operational decision-making lies with RWH Management and the respective local management functions in the entities. Operational implementation of engagement formats is driven by local human resource departments. Currently, engagement and communication formats differ across entities, as no overarching Group-wide process is established. These formats include site noticeboards, email communications, newsletters, staff meetings, intranet platforms and apps, employee surveys, and continuous improvement processes (CIP). While structured annual employee development interviews are conducted at ESW, DONAKO and MCC to formally address development needs and suggestions, this process is not yet uniform across these entities. The introduction of employee interviews is planned at VALJI.

The effectiveness of these measures is assessed locally through regular feedback from employees regarding the various communication formats, as well as through cooperation with worker representatives. Where established (at ESW and DONAKO), works councils represent the primary employee representation body, safeguarding the interests of both blue- and white-collar workers in operational and corporate matters (see details in Chapter *3.1.6*, *Collective bargaining coverage and social dialogue metrics (ESRS S1-8)*). At VALJI, trade unions serve as the key representative bodies and maintain a regular exchange with local human resource departments. Employees can also address workforce-related concerns through local human resource departments or supervisors, as applied at MCC, as they are a non-union company. For reporting misconduct or specific incidents, whistleblowing channels are available on the entities' websites or intranets (see Chapter *3.1.4*, *Grievance mechanisms*).

To ensure that workforce perspectives are directly considered in identifying material impacts, risks, and opportunities regarding the own workforce, both employee representatives (ESW works council) and HR were actively involved in the materiality assessment process (see Chapter *1.3*).

[25] Non-employees are defined as self-employed persons who have a contract with the Group to supply labor and workers provided by temporary employment agencies

3.1.4 Management of material IROs (ESRS S1-1, S1-3, S1-4)

HR topics are primarily governed at local level by the respective human resource departments within the individual entities. Responsibility for operational human resource management, implementation of labor-related measures and compliance with local employment laws and regulations therefore remains with the respective local entities. Since 2024, a dedicated Group HR function has been established. As for now, this function oversees human resource agendas and personnel development activities for entities ESW and VALJI only. Beyond these responsibilities, human resource governance remains largely decentralized.

Policies (ESRS S1-1)

Code of Conduct: Code of Conduct represents the overarching policy framework governing material impacts, risks and opportunities (IROs) in connection with the Group's own workforce. At state, the Group has not assessed compliance of the Code of Conduct with *UN Guiding Principle for Business and Human Rights, the ILO Declaration of Fundamental Principles and Rights at Work* and the *OECD Guidelines for Multinational enterprises*. At the time of reporting, it had not yet been determined whether and how compliance with these standards would be assessed and implemented. In accordance with the process described in Chapter *4.1.3*, policies are developed centrally for ESW/RWH and subsequently rolled out within the respective entities. However, the Code of Conduct is not implemented as a Group-wide policy but is locally adopted and harmonized into an entity policy. While local legal and regulatory requirements are taken into consideration during implementation, the content, underlying principles and formal requirements of the Code of Conduct remain aligned across the Group. Oversight of the implementation and alignment of the Code of Conduct and also other policies within the Group is centrally coordinated and managed by the Chief Compliance Officer (CCO). At the reporting date, the Code of Conduct has been rolled out in the entities ESW/RWH, VALJI and DONAKO. Within MCC, the MCC Handbook currently represents the central workforce-related policy document. The handbook reflects the principles and values of the Code of Conduct, while not yet fully aligned with the Code of Conduct in all aspects and is available for employees in print at the respective site. The Code of Conduct is made available to employees through various channels, including dedicated applications (e.g. the ESW app), entity intranets (e.g. at DONAKO), company websites (e.g. at ESW and DONAKO) and printed copies available at all sites.

Besides the Code of Conduct, the Group does currently not maintain additional comprehensive group-wide human resource policies governing IROs in connection with its own workforce.

Strategies and concepts (ESRS S1-1)

Employment relationships within the Group are governed locally within the entities by the respective human resource departments following the applicable legal and contractual frameworks. Depending on the local context, this includes labor laws, collective bargaining agreements, works agreements and individual employment contracts. In Austria, for ESW/RWH, the relevant legal framework includes in particular the *General Civil Code (Allgemeines Bürgerliches Gesetzbuch, ABGB) Austrian Labor Constitution Act (Arbeitsverfassungsgesetz)*, the *Employee Protection Act (ArbeitnehmerInnenschutzgesetz)*, the *Working Hours Act (Arbeitszeitgesetz, AZG)*, the applicable collective agreements for blue- and white-collar workers of the *Austrian Metal Technology Industry Association, Foundry Industry Division*. For the U.S. site MCC, the key labor law foundations include the *National Labor Relations Act*, the *Fair Labor Standards Act*, and the *Occupational Safety* and *Health Act*, supplemented by additional statutory requirements of the Commonwealth of Pennsylvania. In Poland, for the entity DONAKO, the rights and obligations of employees are primarily governed by the *Polish Labour Code* and its implementing acts, while specific aspects of employment relationships are regulated by additional statutory provisions. Sources of labor law in Poland also include collective bargaining agreements concluded between employers or employers' organizations and trade unions, as well as workplace regulations, remuneration rules and company statutes based on statutory law. In Slovenia, the central legal framework is the *Employment Relationship Act (ZDR-1, Official Gazette "Uradni list" No. 21/2013)*, which establishes the legal basis for the rights and obligations of employers and employees in both the private and public sectors. The *Collective Agreements Act (ZKolP, 2006)* defines the parties to collective agreements, regulates their conclusion, content, form, duration, termination, and extension, and distinguishes between interest and legal disputes, including provisions for mediation and arbitration. Furthermore, in Slovenia, a company-level collective agreement is negotiated between the entity and the relevant trade union(s), detailing salaries, working hours, rest periods, and other employment conditions. The Group strictly upholds employees' rights regarding fair working time arrangements and appropriate remuneration, prohibits child labor and all forms of forced labor and modern slavery, and respects freedom of association and the right to collective bargaining in accordance with applicable national legislation.

Subtopic: Working conditions

- **Secure Employment:** The strategic approach to long-term employment management aims to ensure that current and future employee needs are covered across all entities and are managed locally within the entities by the respective human resource departments in local human resource

frameworks and guidelines. To ensure long-term and secure employment for our employees, employment contracts are generally concluded on a permanent basis within all entities. Fixed-term employment contracts are generally limited to specific cases in connection with project-related activities with a clearly defined end date and with apprentices (only at ESW). Apprentices are employed on a fixed-term basis for the duration of their apprenticeship - upon successful completion of their apprenticeship and mutual agreement to continue employment, their contracts are converted into permanent employment relationship following our strategic approach. For measures addressing secure employment see *Measures and activities (ESRS S1-3, S1-4)*.

- **Employment contracts and collective bargaining agreements:** The employment relationship of employees is based on a written employment contract that complies with all applicable legal requirements in the respective countries of the entities stated in the Code of Conduct. The Group commits to upholding all legal obligations regarding employment contracts and collective bargaining (see Chapter 3.1.6) within the respective entities and also supports additional local work agreements. Examples of those works agreements at entity-level include flexible working time model arrangements, working from home arrangements for administrative employees or commuter allowances. The objective of such works agreements is to create attractive working conditions for employees and to provide benefits that go beyond statutory requirements, thereby supporting long-term employee retention.
- **Works councils and freedom of association:** RWH Group recognizes and upholds the right of all employees, in compliance with applicable local legislation, the right of employee representation, to form employee representative bodies and to engage in collective bargaining regarding working conditions as stated in the Code of Conduct. All employees have the right to join or establish associations of their choice in accordance with legal requirements in the respective countries, and to stand as candidates in works council elections. Employees are neither advantaged nor disadvantaged based on their membership or non-membership in a trade union or employee representation body. The Management and works councils in the respective entities maintain an open and constructive dialogue, aiming to address employees' concerns in the best possible manner. The objective is to achieve balanced and sustainable solutions that reconcile the economic interests of the Group and entities with the interests of its employees (see Chapter 3.1.6 regarding the availability of works councils within the entities).
- **Adequate wages:** RWH Group is committed to fair remuneration that corresponds at least to the statutory minimum wage applicable at the place of employment and guided by the principle of equal pay for work of equal value, regardless of gender. No specific group-wide wage or remuneration framework or policy is implemented. At ESW, the minimum wage stipulated in the collective agreement serves as the benchmark for appropriate remuneration. At the DONAKO, the statutory minimum wage serves as the reference point. Wage and salary structures are aligned with standard remuneration levels in the region and fully comply with all EU and national legal requirements. At VALJI, the remuneration system is based on the Slovenian minimum wage as well as the systematization of positions and salaries negotiated with the trade union, resulting in pay levels above the statutory minimum. Management and expert positions are not covered by the systematization but are also significantly above the Slovenian minimum wage. At MCC, employee remuneration complies with U.S. Federal and Pennsylvania minimum wage laws and is further guided by industry standards. An internal framework additionally takes into account job responsibilities, experience, and performance, ensuring competitive pay while maintaining full regulatory compliance.
- **Health and safety:** RWH Management and the management of the individual entities bear overall responsibility for occupational health and safety of employees at the respective sites. Compliance with applicable national occupational health and safety regulations is managed decentral within the individual entities by designated health and safety officers and anchored in internal procedures and guidelines. According to the Code of Conduct in the entities ESW, VALJI and DONAKO and the MCC Handbook, the strategic approach to health and safety is based on the continuous improvement of the working environment through prevention programs and measures promoting occupational health and accident prevention and employees are required to comply with applicable safety instructions and are expected to actively contribute to the continuous improvement of workplace safety. At DONAKO, processes regarding occupational health & safety are additionally certified with the international occupational health and safety management standard ISO45001, which is currently not in place in the entities ESW/RWH, VALJI and MCC.

Subtopic: Equal treatment and opportunities for all

- **Gender equality and equal pay for work of equal value:** RWH Group is committed to promoting equal opportunities and protecting all employees from discrimination in any form. In accordance with the respective Code of Conduct at ESW/RWH, VALJI and DONAKO, as well as the MCC Employee Handbook, no individual may be discriminated against or harassed on the basis of ancestry, ethnic origin, skin color, religion, gender, or any other protected characteristics. Recruitment and promotion decisions shall be based exclusively on qualifications, skills, and performance. RWH Group and its entities ensure that all employees receive appropriate remuneration for their work and commitment and that statutory provisions as well as any applicable collective bargaining agreements regarding working hours and minimum wages are strictly complied with (see also Subtopic: *Working conditions*).
- **Training and skills development:** Employee development within RWH Group is managed by the respective local human resource departments in coordination with the department supervisors and local management. Currently, there are no group-wide policies in place, specifically addressing the strategies and concepts regarding training and skills development for our employees. Nevertheless, the Group places strong emphasis on recognizing employees' goals and aspirations and enabling appropriate development opportunities. For measures addressing regarding training and skills development see *Measures and activities (ESRS S1-3, S1-4)*).
- **Actions against violence and harassment in the workplace:** Violence and harassment in the workplace are not trivial offenses and are therefore subject to a strict zero-tolerance policy across all sites of RWH Group. In accordance with the respective Codes of Conduct at ESW/RWH, VALJI and DONAKO, as well as the MCC Employee Handbook, no individual may be subjected to harassment, discrimination, or violence. Respectful interaction and the protection of personal dignity form a fundamental part of the Group's corporate culture. Employees who suspect unequal treatment or experience distressing incidents can report to local human resource departments, direct supervisors, works councils (at ESW and DONAKO), or through the grievance mechanisms available at each entity (with the listed limitations stated below and additional stated in Chapter 3.2.4). Currently, reports of harassment or violence in the workplace do not fall within the material scope of the *Directive (EU) 2019/1937* and the respective Whistleblowing Protection Policies in the entities. If a reported violation is not covered by the statutory whistleblower protection framework, the responsible recipient (Compliance Officer) must therefore explicitly inform the reporting person of this circumstance. Irrespective of the formally defined scope of application, all reports are treated confidentially and handled with due care.

Remediation (S1-3)

If its establishes that a material negative impact on its staff has occurred or is imminent in the entities of the Group, the entity concerned will immediately implement remedial measures. The local management will, if necessary, consult with local human resource departments, compliance officers, works council, or other relevant departments depending on the specification of the impact. The remedial action to be taken is determined on a case-by-case basis and selected in terms of measures that appear most suitable to prevent, immediately put an end to or minimize the extent of any negative impact. In order to prevent negative impacts with respect to occupational health and safety or take remedial action in case an accident occurs, measures such as immediate incident investigations, first aid measures (if necessary), case documentation in risk assessments, targeted communication with employees and supervisors, training or security briefings are taken. In particular, accident analyses, regular risk assessments, inspections or audits help to identify and eliminate accident black spots, unsafe conditions and risks as well as to review the efficacy of the relevant measures.

Grievance mechanisms

Regarding remediation, grievance mechanisms have also been implemented at the respective sites. The procedures for handling hints or reports are documented in the Whistleblowing policy. The grievance mechanisms in the entities cover the legally defined scope defined in Directive (EU) 2019/1937. As a result, certain employment-related matters, such as systematic violations of working time regulations, workplace bullying, wage dumping, unsafe working conditions or sexual harassment, fall outside the statutory scope of whistleblower protection. In such cases, reporting individuals are not covered by formal legal protection. Nevertheless, all hints and reports submitted outside the statutory scope are treated confidentially and assessed individually to determine appropriate follow-up and remedial actions. Where a reported matter does not fall within the statutory whistleblower protection framework, the reporting individual is informed accordingly. The Group maintains a strict non-retaliation principle for all good-faith reports, irrespective of their formal classification. For concerns related to working conditions and other employment-related matters that fall outside the legal whistleblowing scope, employees are encouraged to use internal channels, including local human resource departments, direct supervisors and works councils (where established). These channels ensure that concerns can be raised and addressed in an appropriate and structured manner. In addition to formal grievance mechanisms, the Group fosters regular dialogue with employees through structured individual employee interviews which allow employees to provide feedback, improvement suggestions, or complaints (currently implemented at ESW/RWH, DONAKO and MCC). These dialogues support internal communication, strengthens trust in internal processes and contributes to identifying potential negative impacts at an early stage. This ensures that the problems raised are addressed and that employee interests are considered.

Measures and activities (ESRS S1-3, S1-4)

Subtopic: Working conditions

Material impacts, risks and opportunities related to working conditions, in particular occupational health and safety, secure employment, collective bargaining agreements and freedom of association are addressed with preventive and mitigating measures embedded in the entities' operational structures. The measures described below are designed to address these material IROs in Chapter *3.1.1* and to implement the policies, strategies and concepts described in Chapter *3.1.4*. For the implementation of the action plan and corresponding measures defined for ESRS S1 it is not required to allocate significant additional financial resources in future periods compared to the financial resources already allocated in the reporting period.

Key overarching measures for the different topics include:

- **Secure employment:** In line with the strategy to ensure secure employment for employees, employment contracts for new employees were generally concluded on a permanent basis within all entities and this approach is being followed in the next year. Exceptions applied to contracts related to project-based employment as well as the employment of apprentices within ESW.
- **Employment contracts and collective bargaining agreements:** Measures in this area included the development of a new remuneration scheme at the VALJI site, aimed at establishing transparent and clearly structured salary frameworks. Amendments and requirements arising from applicable collective bargaining agreements at ESW, VALJI and DONAKO were implemented accordingly by the respective entities. No further specific measures were implemented in this area in 2025 and are currently planned for 2026.
- **Works councils and freedom of association:** The respective entities continued to ensure compliance with applicable legal requirements regarding employee representation, freedom of association and cooperation with works councils. No additional specific measures were implemented in 2025 and are planned for 2026.
- **Adequate wages:** The development of the new remuneration scheme at the VALJI site also represented a key measure in the area of adequate wages, contributing to greater transparency, consistency in salary structures and competitiveness. Wage adjustments in line with the requirements of the applicable collective bargaining agreements were implemented accordingly by the entities ESW, VALJI and DONAKO and will be implemented following upcoming adjustments in collective bargaining agreements.
- **Health and safety:** Local measures were continuously implemented by the respective health & safety officers to ensure compliance with applicable occupational health and safety laws and regulations. At DONAKO, the occupational health and safety management system was successfully recertified in accordance with the ISO45001 standard in 2025. With regard to occupational accidents, conducted measures in all entities included continuous systematic documentation and recording of workplace incidents, the performance of accident analyses, and the implementation of corrective and preventive actions aimed at avoiding similar incidents in the future. New employees received occupational safety instruction in line with the respective local onboarding processes. Preventive health checks were offered across all sites, including examinations related to lung function, hearing, vision, cardiovascular health and spirometry where required. These examinations are primarily intended for blue-collar workers but are also available to administrative employees (white-collar workers). In addition, a broad range of occupational health and safety awareness and qualification measures were conducted during the reporting year. These include training related to the handling of chemicals, proper use of personal protective equipment, safety procedures for working with railway wagons, loading and securing cargo in road and rail transport, as well as regular fire safety exercises for employees responsible for extinguishing incipient fires in foundry operations. For administrative employees (white-collar workers), workplace ergonomic assessments were specifically offered at the ESW site in order to prevent long-term health impacts, such as musculoskeletal disorders and eye strain.

Subtopic: Equal treatment and opportunities for all

Material impacts, risks and opportunities related to equal treatment and opportunities for all, in particular training and skills development, gender equality and equal pay for work of equal value and measures against violence and harassment in the workplace are addressed with preventive and mitigating measures embedded in the entities' operational structures. The objective is to prevent discriminatory practices, ensure equal access to employment and development opportunities and foster a respectful, performance-oriented, and inclusive working environment across all entities of RWH Group. The measures described below are designed to address these material IROs in Chapter *3.1.1* and to implement the policies, strategies and concepts described in Chapter *3.1.4*.

- **Training and skills development:** A key measure implemented in the entities ESW/RWH, DONAKO and MCC regarding the training and skills development of employees is the annual employee interview conducted with both blue- and white-collar workers. At VALJI, employee interviews are currently not implemented. While the structure of these interviews differs between entities and employee groups, they generally aim at reviewing performance during the previous year and identifying development measures and training opportunities to support employees' professional growth in the upcoming year in alignment with the local human resource department and Management. Depending on the employee's role and responsibilities, training opportunities include machine and equipment operation training, quality and environmental management training, occupational health and safety training, as well as IT and digital systems training, external leadership trainings, language courses, time management and organizational skills training, soft skills development, and other external professional education and certification programs for blue- and white-collar workers. This regular process is intended to foster engagement with the own workforce, provide targeted training and development opportunities, and support long-term employee retention.
  Independently of the annual employee interviews, specifically blue-collar workers receive various trainings related to occupational health and workplace safety, as well as the operation of specific equipment and machinery, such as forklifts and cranes. New employees receive training according to local onboarding processes. For blue-collar workers, this includes workplace-specific onboarding, machine training, and instruction on the mandatory use of personal protective

equipment and other safety measures. Administrative employees undergo a similar onboarding process, which likewise includes general occupational health and safety training and training on IT systems and data protection. Depending on the requirements and responsibilities of the respective administrative position, the onboarding process additionally include meetings with different departments and regular dialogues with supervisors and the local human resource department during the probationary period according to the onboarding plan.
Apprenticeship training has a long-standing tradition in Austria and is an integral part of workforce development at the entity ESW. In 2024, a new apprenticeship academy ("ESW Academy") was opened with approximately 900 m² of dedicated infrastructure. Currently, 25 apprentices are participating in apprenticeship training programs. Throughout the three-year apprenticeship period, apprentices benefit from state-of-the-art workshop equipment as well as dedicated training, learning, and recreation facilities. The ESW Academy thereby strengthens long-term skills development, supports succession planning, and contributes to securing qualified specialists for the future at ESW.

- **Gender equality and equal pay for work of equal value:** Through strict implementation of the requirements of collective bargaining agreement within the entities ESW/RWH, VALJI, and DONAKO, as well as adherence to the provisions set out in the MCC remuneration system, the Group continuously strives to ensure equal pay for equal work regardless of employees' gender. The newly introduced remuneration system at VALJI also supports transparency and prevents unequal treatment between genders. ESW has implemented targeted initiatives aimed at encouraging female apprentices (e.g social media campaigns) to pursue careers within our industrial work environment. Equal opportunities also require the establishment of appropriate organizational structures that enable all employees to participate equally in professional life. Within the entities, white-collar workers have the opportunity to work from home and to make use of flexible working time arrangements according to the requirements in collection bargaining agreements or additional local work agreements. These measures support administrative employees in balancing professional and private responsibilities and contribute to reducing structural barriers that may otherwise limit equal participation and career opportunities. This measure only addresses white-collar workers, as working-from-home arrangements and flexible working time arrangements are limited by local production and shift operation schedules for blue-collar workers.
- **Measures against violence and harassment in the workplace:** Measures include the continuous maintenance and operation of reporting channels (grievance mechanism) for submitting complaints related to violence and harassment, taking into account the limitations of the respective scope of application (see Chapter *3.1.4*, Grievance mechanisms and Chapter *3.2.4*, Whistleblowing Policy). Additional local measures included training regarding violence and harassment as part of the training on the Code of Conduct at ESW.

3.1.5 Targets (ESRS S1-5)

The targets are coordinated with Human Resources (RWH) and have been approved by RWH Management as well as Human Resources (RWH). Local human resource departments, health & safety officers and the CCO are responsible for implementing the operational measures for target achievement. The achievement of quantitative targets is measured based on the degree of target attainment, using the relevant metrics disclosed under ESRS S1. Data collection and performance monitoring are carried out in collaboration between RWH ESG & CSR Management, the local ESG coordinators, local human resource departments, the CCO, local compliance and health and safety officers.

Targets

Target	Target (year)	Note
Subtopic Working conditions and health & safety:		
Target of maintaining the TRIFR[26] accident rate at a target value of ≤ 40 in the year 2026 (value in 2025: 44.36)	2026	No progress disclosure in first reporting year
Target of maintaining zero fatalities in the year 2026	2026	No progress disclosure in first reporting year
Subtopic Equal treatment and opportunities for all:		
Target of completing the roll-out of the ESG Policy in the entities VALJI, DONAKO and MCC (combined target for E1, S1, S2 and G1) until end of 2027 including training of employees	end of 2027	No progress disclosure in first reporting year
Target of implementing continuous monitoring of training hours in RWH Group in connection with ESRS S1-13 metrics until end of 2027	end of 2027	No progress disclosure in first reporting year
Target of achieving zero confirmed incidents of discrimination or harassment within its own workforce during the reporting year 2026	2026	No progress disclosure in first reporting year
Target of achieving zero confirmed severe human rights incidents within its own workforce, including human trafficking, child labor, forced labor, or other forms of modern slavery during the reporting year 2026	2026	No progress disclosure in first reporting year

816	Total number of employees
737	Male
79	Female
17%	Fluctuation rate

[26] TRIFR (Total Recordable Injury Frequency Rate) is calculated per 1,000,000 hours worked for the own workforce (excluding non-employees) and corresponds to the ESRS metric Rate of recordable work-related accidents

3.1.6 Metrics (ESRS S1-6 to S1-17)

Unless explicitly stated otherwise, all disclosures and metrics cover RWH, ESW, DONAKO, VALJI and MCC. Data is derived from local ERP systems operated by the respective entities or through other reporting documents maintained by the local human resource departments and other relevant functions and is consolidated by RWH ESG & CSR Management in designated data collection templates on group-level. The Group makes use of the phase-in option in accordance with ESRS and is not disclosing non-employee metrics related to ESRS S1-7 in the first reporting year.

RWH Group employee metrics (ESRS S1-6)

RWH Group employees by contract type, gender and number of persons[27]	Unit	RWH Group (total)	RWH (Austria)	ESW (Austria)	DONAKO (Poland)	MCC (US)	VALJI (Slovenia)
Total number of employees	Headcount	**816**	7	298	288	61	162
Male	Headcount	**737**	6	273	253	59	146
Female	Headcount	**79**	1	25	35	2	16
Total number of permanent employees	Headcount	**809**	7	298	281	61	162
Male	Headcount	**732**	6	273	248	59	146
Female	Headcount	**77**	1	25	33	2	16
Total number of temporary employees	Headcount	**7**	0	0	7	0	0
Male	Headcount	**5**	0	0	5	0	0
Female	Headcount	**2**	0	0	2	0	0
Total number of full-time employees	Headcount	**795**	6	281	285	61	162
Male	Headcount	**732**	5	270	252	59	146
Female	Headcount	**63**	1	11	33	2	16
Total number of part-time employees	Headcount	**21**	1	17	3	0	0
Male	Headcount	**5**	1	3	1	0	0
Female	Headcount	**16**	0	14	2	0	0
Total number of non-guaranteed working hours employees[28]	Headcount	**0**	0	0	0	0	0
Male and Female	Headcount	**0**	0	0	0	0	0

Fluctuation metrics	Unit	RWH Group (total)	RWH (Austria)	ESW (Austria)	DONAKO (Poland)	MCC (US)	VALJI (Slovenia)
Total newly hired employees incl. re-hires	Headcount	**125**	0	40	20	27	38
Departures[29]	Headcount	**137**	1	33	37	33	33
Fluctuation rate[30]	%	**17%**					

[27] Headcount as of December 31, 2025

[28] Non-guaranteed hours employees generally include "casual workers" according to RWH Group's definition. Since RWH Group does not employ casual workers, the values are set to zero

[29] Includes all departures (voluntary and due to dismissal, retirement, or death)

[30] Fluctuation is calculated by dividing all departures (voluntary and due to dismissal, retirement, or death) by the total RWH workforce

Collective bargaining coverage and social dialogue metrics (ESRS S1-8)

Across RWH Group, employee representation structures vary by entity but generally include trade unions, works councils, and collective bargaining agreements. At DONAKO, two forms of employee representation are in place. Employees are represented by two trade unions, with voluntary membership. While the unions primarily represent their members, non-members may also seek representation in accordance with applicable law. Currently, approximately 40% of the DONAKO workforce are union members. The trade unions play a significant role in social dialogue, as management negotiates salary-related matters, company regulations, and individual employee concerns with them. In addition, a works council represents all employees excluding management. The works council primarily serves an advisory and consultative role, with more limited powers compared to the trade unions. The existing collective bargaining agreement applies to all employees except top management (CEO and directors). Additional benefits beyond general provisions include anniversary awards, retirement severance payments, and annual vacation allowances. Changes to these arrangements require negotiation with the trade unions. At VALJI, 7% of employees are employed under individual employment contracts, and all employees are covered by the *Employment Relationships Act (ZDR-1)*. In addition, company-level and sectoral collective agreements apply to employees not on individual contracts. For employees with individual contracts, selected provisions of these agreements apply, with specific exceptions defined in their employment contracts. At VALJI no works council is in place. At ESW, all employees except management are covered by collective bargaining agreements and are represented accordingly through employee representation structures. At RWH (holding company), employees do not have a works council and therefore no formal internal employee representation. However, employees (except for RWH Management) are covered by collective bargaining agreements. Data related to collective bargaining agreement coverage is derived from the local ERP systems and corresponding employee contract data maintained by the local human resource departments. The percentage values for the social dialogue metric reported below include only employees covered by entity-specific (internal) works councils. There is no agreement on representation by a European Works Council. The table "Collective bargaining coverage and workforce representatives" shows the coverage rates of the RWH Group on the left and the coverage rates of the individual entities on the right.

Collective bargaining coverage and workforce representatives

	RWH Group			By entity		
Percent	**Collective bargaining coverage**		**Social dialogue**	**Collective bargaining coverage**		**Social dialogue**
Coverage rate	**Employees – EEA[31]**	**Employees – Non-EEA**	**Workplace representation (EEA only)**	**Employees – EEA**	**Employees – Non-EEA**	**Workplace representation (EEA only)**
0 -19%	-	-	-	-	MCC	RWH
20 - 39%	-	-	-	-	-	-
40 - 59%	-	-	-	-	-	-
60 - 79%	-	-	RWH Group	-	-	-
80 - 100%	RWH Group	-	-	RWH, ESW, DONAKO, VALJI	-	ESW, DONAKO

[31] European Economic Area (EEA)

Adequate Wages (ESRS S1-10)

RWH Group is committed to fair remuneration that corresponds at least to the statutory minimum wage applicable at the place of employment and guided by the principle of equal pay for work of equal value, regardless of gender. Data regarding wages are derived from the local payroll systems operated at each entity. At ESW/RWH, the minimum wage stipulated in the collective agreement serves as the benchmark for appropriate remuneration. For 2025, this amounts to EUR 2,568.80 per month. At DONAKO, the statutory minimum monthly wage is EUR 1,100.55 (equivalent to PLN 4,666.00) serves as the reference value. Wage and salary structures are aligned with standard remuneration levels in the region and fully comply with all EU and national legal requirements. At VALJI, the remuneration system is based on the Slovenian statutory minimum monthly wage of EUR 1,277.72 and on a structured job classification and salary framework negotiated with the trade union, resulting in remuneration levels above the legal minimum wage. Management and expert positions are not covered by the systematization but are also significantly above the Slovenian minimum wage. At MCC, employee remuneration complies with U.S. federal and Pennsylvania minimum wage regulations, which establish a statutory minimum hourly wage of EUR 6.41 for 2025 (equivalent to USD 7.25), and is additionally aligned with industry standards. An internal framework additionally takes into account job responsibilities, experience, and performance, ensuring competitive pay while maintaining full regulatory compliance. Therefore, all employees receive wages that meet or exceed the applicable adequate wage benchmarks in the respective countries.

Training and skills development metrics (ESRS S1-13)

Training and skills development opportunities of employees are considered essential for employee engagement and employee satisfaction as well as for producing high-quality products and are therefore identified as material in the DMA. Due to technical and organizational challenges, metrics related to S1-13 are not disclosed in the first reporting year. The Group therefore makes use of the phase-in option in accordance with ESRS.

Health and safety metrics (ESRS S1-14)

Health and safety metrics represent the own workforce of RWH Group (excluding non-employees) and are disclosed only as consolidated values for the whole Group due to the current data collection and reporting structure of this metrics. The metrics presented in the following table "Health and safety" are prepared based on data collected from the local payroll systems and health and safety management systems of the respective entities. Occupational accidents and work-related ill-health cases are locally recorded and monitored in accordance with applicable legal reporting requirements and internal incident reporting procedures by the local health & safety officers. Data was subsequently harmonized at Group level according to definition in Annex III to Commission Delegated Regulation (EU 2023/2722), Table 2 "Recordable work-related injury or ill health". Days lost are derived from recorded absence periods attributable to work-related accidents or illnesses from the local payroll systems. Working hours are derived from local payroll systems and refer to actual working hours including overtime. More details can be found in the Footnotes *32*, *33*, *34* and *35*.

Health and safety	Unit	RWH Group (total)
TRIFR[32]	1.000.000 h	44.36
Number of recordable work-related accidents/illnesses[33]	Quantity	65
Number of days lost to work-related injuries/illnesses	Days	699
Number of fatalities of work-related injuries	Quantity	0
Number of cases recordable work-related ill health[34]	Quantity	1
Percentage of employees covered by the occupational health and safety management system	%	100%
Covered by ISO45001[35]	%	35%

[32] TRIFR (Total Recordable Injury Frequency Rate) is calculated per 1,000,000 hours worked for the own workforce (excluding non-employees) and corresponds to the ESRS metric Rate of recordable work-related accidents

[33] The number of recordable work-related accidents includes cases according to the definition in Annex II to Commission Delegated Regulation (EU) 2023/2772, Table 2 "Recordable work-related injury or ill health"

[34] Work-related illnesses include cases according to ESRS S1 AR92 and are also considered in "Number of recordable work-related accidents/illnesses" including one case related to hearing deterioration

[35] All employees of DONAKO are covered by ISO45001 representing 35% of RWH Group's own workforce. All other entities are not certified in accordance with ISO45001

Remuneration metrics (pay gap and total remuneration) (ESRS S1-16)

Gender-specific salary differences (gender pay gap): The difference between the salary of female and male employees, expressed as a percentage of the salary of male employees, is 7.58% for 2025. The calculation considers all employees including apprentices, blue-collar and white-collar workers, and management positions. The data is based on the local payroll systems of the ESW/RWH, DONAKO, MCC and VALJI sites and is calculated based on the average salary (gross hourly earnings) of male and female employees. The average salary for male and female employees comprises base salary, overtime compensation, all types of allowances and benefits in kind, as well as additional payments such as holiday allowances, bonuses, and other voluntary special payments granted by the employer. To determine the group-wide average gross hourly earnings for female and male employees in the currency *Euro (€)*, conversion is performed using the annual average exchange rates for the year 2025 following the financial statements[36]. Certain information required under ESRS 1, Paragraph 105-108 may not be disclosed if it is classified or sensitive, even when it has been identified as material (see Chapter *1.1.6*). This is currently applied to the *Annual total remuneration ratio*, as the corresponding information is considered sensitive management data.

Incidents, complaints and severe human rights impacts (ESRS S1-17)

During the reporting period, one complaint related to harassment was reported through the local HR department in one of RWH Group's entities. The complaint was reviewed in accordance with internal procedures and resolved between the parties involved and was subsequently closed. The case was not classified as a confirmed incident of discrimination according to internal definitions (see definitions in Footnotes *37* and *38*). No other cases were reported in the reporting period to the local human resource departments or through other channels (e.g. grievance mechanisms or works councils at ESW and DONAKO).

Discrimination, harassment and human rights incidents	Unit	RWH Group (total)
Discrimination and harassment		
Number of incidents of discrimination, including harassment[37]	Quantity	0
Complaints of discrimination and harassment filed through channels for people in own workforce	Quantity	1
Amount of fines, penalties, and compensation for damages as result of incidents of discrimination and harassment	EUR	0
Human rights		
Number of severe human rights issues and incidents connected to own workforce (e.g. child labor, forces labor, modern slavery)[38]	Quantity	0
Amount of fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce	EUR	0

[36] Average annual exchange rates for 2025: 1 Euro (EUR) ≙ 4.2397 Polish Zloty (PLN); 1 Euro (EUR) ≙ 1.130 US Dollar (USD)

[37] Incidents of discrimination and harassment are defined as incidents related to discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination affecting employees during the reporting period. This also includes harassment as a specific form of discrimination.

[38] Incidents of severe human rights issues are defined as incidents related to human trafficking, child labor, forced labor, or other forms of modern slavery affecting employees during the reporting period.

3.2 S2 – Workers in the value chain

3.2.1 Material IROs (ESRS 2 SBM-3)

Material impacts (Inside-Out)

ESRS topic	Impact description	Actual/Potential Positive/Negative	Time Horizon	Causation/ Localization
Health and safety	Potential negative impacts on labor rights and working conditions in the upstream and downstream value chain may arise where OHS standards are insufficiently implemented or monitored, potentially leading to workplace accidents as well as acute and chronic health issues, with production workers being particularly affected.	potential negative	short-term	supply chain
Equal treatment and opportunities for all ↗ Gender equality and equal pay for work of equal value ↗ Measures against violence and harassment in the workplace	Insufficient measures to prevent discrimination including discrimination in the upstream and downstream value chain can occur where social standards are not consistently applied.	potential negative	short-term	supply chain
	Lack of clear communication and enforcement of social standards such as training, reporting channels, or a Code of Conduct among suppliers and business partners increases the risk of workplace violence and harassment and reduces the effectiveness of reporting and remediation of violations.	potential negative	short-term	supply chain
Other work-related rights ↗ Child labor ↗ Forced labor	Due to global supply chains, there is a risk of labor and human rights violations, including child labor and forced labor along the value chain (Note: this impact is material for S2 as well as G1 in Chapter *4.1.1*)	potential negative	short-term	supply chain

Material risks and opportunities (Outside-In)

ESRS topic	Risk/opportunity description	Risk/Opportunity	Time Horizon	Causation/ Localization
Health and safety	Significant reputational damage to the Group may occur if OHS are not upheld, particularly by direct business partners, and if RWH Group has not implemented adequate prevention measures (communication, awareness etc.)	risk	medium-term	own sites

3.2.2 Interaction with strategy and business model (ESRS 2 SBM-3)

As a Group in the iron & steel industry, the Group is subject to a structural dependency on global raw material markets, as the procurement of alloying elements such as tungsten or manganese from regions with elevated human rights risks (e.g., China) is strategically necessitated by specific quality requirements and limited global substitutability. This dependency represents an inherent risk to the business model, as potential violations of labor and human rights standards in the deep supply chain not only result in negative outcomes for those affected but can also lead to regulatory sanctions and reputational damage. Regarding strategic management, the Group recognizes significant potential for optimization and works continuously to further embed human rights and health and safety aspects within supplier management and procurement processes. While the focus in the upstream supply chain is on the further development of due diligence processes, the Group addresses risks for workers in the downstream value chain by providing transparent product information (e.g. roll certificates) and comprehensive technical service for our customers, which can subsequently contribute to reducing risks of accidents during the service life of our products. This also includes comprehensive failure analysis to minimize accidents associated with roll or machine failures. For the implementation of the action plan and corresponding measures defined for ESRS S2 it is not required to allocate significant additional financial resources in future periods compared to the financial resources already allocated in the reporting period.

3.2.3 Involvement of affected stakeholders (ESRS 2 SBM-2, S2-2)

The Group tries to actively engage with stakeholders across the value chain to identify and address their interests and concerns. In the upstream value chain, communication is maintained through regular supplier dialogues primarily conducted by the local procurement departments and the provision of whistleblowing channels, which are accessible to internal and external stakeholders (e.g., employees, customers, suppliers, sub-suppliers etc.) for reporting of potential grievances (see details in Chapter 3.2.4, *Whistleblowing policy*). These channels are made available via the entity websites of ESW, VALJI and MCC and enable confidential reporting of potential incidents or concerns. At time of reporting, the local whistleblowing channel of DONAKO is only available to employees of the entity and accessible via the entity's local intranet.

Reports submitted through the whistleblowing channels are processed in accordance with the Group's whistleblowing procedures outlined in Chapter 4.1.3, *Whistleblowing and investigation procedures*. As additionally outlined in Chapter 3.1.4, *Remediation (S1-3)*, the current material scope of the whistleblower protection framework is aligned with the scope defined in Directive (EU) 2019/1937. As a result, certain topics relevant to workers in the value chain are presently not fully covered by the formal scope of statutory whistleblower protection outlined in the Whistleblowing policy. Consequently, individuals reporting such matters do not fall within the legally defined protection regime. Nevertheless, all reports submitted in good faith, irrespective of their formal classification under the current material scope of the Whistleblowing policy, are treated confidentially. Considering the impacts, risks and opportunities (IROs) identified under ESRS S2 as part of the DMA, the Group acknowledges that the current design of the whistleblower protection framework presents areas for improvement. In particular, the broader accessibility and thematic coverage of grievance mechanisms for workers in the value chain will be further evaluated as stated under in Chapter 3.2.4, *Maintenance of whistleblowing channels*.

In the downstream value chain, the Group ensures close cooperation with business partners through frequent and regular site visits and dedicated technical support for customers from the R&D, quality, and sales departments. To include the views of affected stakeholders in the value chain in the materiality analysis, the Group explicitly incorporated the perspectives of both suppliers and customers through a targeted survey. This systematic engagement ensures that the views of the value chain are considered in the identification and assessment of impacts, risks and opportunities. To further strengthen the materiality analysis and risk assessment, the Group incorporates secondary data and studies from recognized organizations (e.g., ILO, The World Bank) as credible proxies to assess and evaluate risks for supply chain workers, particularly including those in the deeper value chain with whom the Group does not maintain direct business relationships. The Group has not entered into any Global Framework Agreements or specific agreements with global union federations related to workers in the value chain. However, the Group promotes the right to collective bargaining and freedom of association in alignment with applicable national legislation in the respective countries through its policies (see Chapter 3.2.4).

3.2.4 Management of material IROs (ESRS S2-1)

Managing impacts and risks in the value chain

RWH Group is currently establishing its framework for targeted policies and measures regarding workers' rights within the value chain. We are aware that the Group's value chain due diligence processes are in their initial stages. Consequently, the current priority is to build a robust system that ensures compliance with evolving regulatory requirements, specifically addressing the main IROs in connection with ESRS S2. The strategic positioning of RWH Group is that of a *competitive follower*. This approach involves the prioritized adoption of established and proven industry standards to ensure that implemented measures are effective and aligned with market best practices. The methodological approach follows a centralized development with subsequent practical testing. This means that policies, concepts and measures are developed centrally under the responsibility of the RWH CCO and RWH ESG & CSR Management before being rolled out across the other entities in the Group. The most significant potential impacts in the upstream value chain, particularly in regions with lower labor and human rights protections, have been identified as insufficient health and safety standards, discrimination, labor and human rights violations and the risk of harassment or violence (see Chapter 3.2.1). To address these challenges, respective policies and measures addressing these topics are stated in the chapters below.

Policies (ESRS S2-1)

Code of Conduct (at ESW/RWH, VALJI and DONAKO): The key principles forming the basis for managing impacts, risks and opportunities related to workers in the value chain are anchored in the Code of Conduct in the entities. In its activities relating to human and labor rights as well as fair business practices, the Group is committed to the *United Nations Universal Declaration of Human Rights (UDHR)*. The Code of Conduct constitutes the central policy framework and guidance document for the Group's own workforce and establishes binding standards of conduct as is made available on the entity

websites. It also requires business partners to adhere to equivalent principles that are also reflected in the Supplier Code of Conduct (see *Supplier Code of Conduct (at ESW)* below). The Group explicitly prohibits child labor, forced labor, and discrimination, while promoting freedom of association, the right to collective bargaining, and strict adherence to occupational health and safety standards throughout its own operations and from business partners. As part of aligning internal documentation with the requirements of the ESRS framework, the Group identified that certain elements do not yet fully reflect all relevant international standards, including the *United Nations Guiding Principles on Business and Human Rights (UNGPs)*, particularly with regard to the systematic implementation of human rights due diligence processes. Ensuring compliance with due diligence obligations in the supply chain in relation to labor and human rights, as well as communicating expectations regarding occupational health and safety standards to business partners, is understood as an ongoing process. The Group is therefore progressively strengthening its governance structures and due diligence procedures in this area.

Supplier Code of Conduct (ESW): The Supplier Code of Conduct constitutes a key policy instrument directly addressing IROs related to S2 is currently only implemented at the ESW/RWH site but will be progressively rolled-out across all other entities (VALJI, DONAKO and MCC) as a central policy for managing IROs related to ESRS S2. At state, the Group has not assessed compliance of the Supplier Code of Conduct with *UN Guiding Principle for Business and Human Rights, the ILO Declaration of Fundamental Principles and Rights at Work* and the *OECD Guidelines for Multinational enterprises*. At the time of reporting, it had not yet been determined whether and how compliance with these standards would be assessed and implemented. The policy is communicated to employees during compliance training following the training cycle outlined in Chapter *4.1.3*, *Policies and strategies (ESRS G1-1, G1-2, G1-3, G1-4)*. The Supplier Code of Conduct builds upon the principles set out in the Code of Conduct and reflects the commitment that standards applied internally are equally expected from business partners as is therefore also made available on the entity website of ESW. This includes respect for human rights and the rejection of discrimination, the strict prohibition of any form of child labor, forced labor, and modern slavery, as well as the protection of workers' rights and compliance with working conditions in accordance with national labor standards, supporting a culture of diversity and inclusion. Furthermore, strict adherence to laws, regulations, and policies regarding equal opportunity and non-discrimination is expected from our business partners. In order to fulfil supply chain due diligence obligations in the upstream value chain, ESG criteria and compliance with the Supplier Code of Conduct have been incorporated into the general purchasing conditions of the entity ESW (see details in Chapter *4.1.3*), addressing human rights risks within our supply chain. In particular, suppliers are required to comply with applicable legal requirements relating to labor practices, environmental protection and occupational health and safety. Furthermore, suppliers are expected to continuously work towards reducing adverse impacts on people and the environment arising from their business activities.

Whistleblowing Policy (RWH Group Policy): The Whistleblowing Policy is the central Group policy for the protection of whistleblowers and establishes the framework for protecting employees as well as external stakeholders (e.g. customers, suppliers, sub-suppliers, etc.) when reporting concerns or suspected misconduct. The policy governs the design of the reporting system, the legal framework for whistleblower protection, as well as the related processes and responsibilities for handling reports. The current material scope of the whistleblower protection framework is aligned with the scope defined in Directive (EU) 2019/1937. The Whistleblowing Policy is currently not publicly available on the entities websites for workers in the value chain. However, the whistleblowing channels are available through the websites of ESW, VALJI and MCC. At time of reporting, DONAKO's local whistleblowing channel is available exclusively to employees and can be accessed via the entity's internal intranet.

ESG Policy (at ESW): In addition to the Code of Conduct and the Supplier Code of Conduct, the ESG Policy further formalizes the commitment to respecting human rights and upholding international labor standards both within the Group and throughout the value chain. All employees, including management and executive positions of the respective entity as well as external partners operating within the sphere of influence of the respective entity fall under the scope of the ESG Policy. The principles set out in the ESG Policy therefore also serve as an additional reference framework besides the Supplier Code of Conduct for external business partners. Where partners operate within the value chain of ESW/RWH, these principles are expected to be observed accordingly as part of responsible business conduct and value chain due diligence. The ESG Policy is planned to be made available to our business partners via the entity website which has not yet been implemented due to the current roll-out status (see Chapter *2.1.3*) and is planned to be conducted following the roll-out target of the ESG Policy stated in the targets Chapters *2.1.5*, *3.1.5*, *3.2.5* and *4.1.4*.

Measures and activities (ESRS S2-3, S2-4)

Supplier Code of Conduct (ESW) and cascading of due diligence requirements: The introduction and training of the Supplier Code of Conduct at ESW/RWH as a central policy for managing IROs related to ESRS S2 represents a key measure until the end of 2027. Currently, as described in the Chapter Policies (ESRS S2-1), it has yet been implemented in the entity ESW/RWH. The rollout to additional entities is a planned measure while taking into account local operational and regulatory requirements. Communication and cascading due diligence expectations to direct suppliers constitute a continuous measure regarding this policy aimed at strengthening responsible business conduct throughout the supply chain. At ESW/RWH, where the policy is already implemented, suppliers are required to acknowledge and accept the Supplier Code of Conduct. The implementation of this requirement, as well as continuous monitoring and improvement of acceptance rates, is carried out by the local procurement department at ESW. Particular focus is placed on key raw material suppliers first, with higher inherent risk in relation to the identified IROs for workers in the value chain. As described in *Policies (ESRS S2-1)*, in addition to the active requirement for suppliers to acknowledge and accept the Supplier Code of Conduct, compliance with the provisions of the Supplier Code of Conduct is also incorporated into ESW's general purchasing conditions, thereby reinforcing and safeguarding the expectations set out in the policy.

Maintenance of whistleblowing channels and remediation: The key measures related to whistleblowing channels include the operational implementation of and compliance with the processes defined in the Whistleblowing Policy, as well as the continuous maintenance of the systems by the CCO in cooperation with the local Compliance Officers. In this context, the measures primarily include the ongoing adaptation of the channels to changing legal requirements and the potential expansion of the material scope of the Whistleblowing Policy in order to better address due diligence obligations related to IROs in S2, as outlined under *Whistleblowing Policy (RWH Group Policy)* in Chapter *Policies (ESRS S2-1)*. This potential expansion is currently under evaluation. At the time of publication of this report, no final decision regarding such an expansion has been taken at time of publishment of the consolidated sustainability statement.

Remediation of negative impacts for value chain workers: In the event that grievances or incidents are reported, their assessment, investigation and resolution constitute an ongoing measure within the Group. Cases are handled in accordance with the procedures defined in the Whistleblowing Policy, and appropriate remedial and corrective actions are implemented on a case-by-case basis, taking into account the nature, severity and circumstances of the reported issue. In 2025, no severe human rights issues or incidents connected to the upstream or downstream value chain were reported.

3.2.5 Targets (ESRS S2-5)

The objectives related to workers in the value chain pertain exclusively to qualitative targets concerning the expansion and further development of due diligence processes. Targets are approved by RWH Management. Workers in the value chain, their representatives, or credible proxies were not directly involved in the target-setting process.

Targets

Target	Target (year)	Note
Target of completing the roll-out of the ESG Policy in the entities VALJI, DONAKO and MCC (combined target for E1, S1, S2 and G1) until end of 2027 including training of employees	end of 2027	No progress disclosure in first reporting year
Target of completing the roll-out of the Supplier Code of Conduct in the entities VALJI, DONAKO and MCC until the end of 2027 including training of employees (combined target for S2 and G1)	end of 2027	No progress disclosure in first reporting year

4 Governance

4.1 G1 – Business Conduct
4.1.1 Material IROs (ESRS 2 SBM-3)
4.1.2 Business Conduct and Corporate Culture (ESRS G1-1)
4.1.3 Management of material IROs (ESRS G1-1, G1-2, G1-3, G1-4)
4.1.4 Targets (ESRS G1-1, G1-2, G1-3, G1-4)

4.1 G1 – Business conduct

4.1.1 Material IROs (ESRS 2 SBM-3)

Material impacts (Inside-Out)

ESRS topic	Impact description	Actual/Potential Positive/Negative	Time horizon	Causation/ Localization
Management of relationships with suppliers	Due to global value chains, there is a risk of labor and human rights violations, including child labor and forced labor along the value chain (Note: this impact is material for G1 as well as S2 in Chapters *3.1.1* and *4.1.1*)	potential negative	short-term	value chain
	High Scope 3 GHG emissions from the purchase of raw materials with a significant negative impact on climate change (Note: this impact is material for G1, E1 and E5 in Chapters *2.1.1*, *2.3.1* and *4.1.1*)	actual negative	long-term	value chain
Protection of whistle-blowers	Insufficient protection for whistleblowers (both within the Group and in upstream and downstream value chains) can prevent negative incidents from being reported and may expose whistleblowers to physical and psychological harm.	potential negative	short-term	own sites/ value chain

Material risks and opportunities (Outside-In)

ESRS topic	Risk/opportunity description	Risk/ Opportunity	Time horizon	Causation/ Localization
Corporate culture	Reputational risk and financial risks due to compliance violations	risk	medium-term	own sites
	Lack of a clear corporate strategy may weaken credibility with customers and negatively affect the Group's competitiveness.	risk	medium-term	own sites
	Lack of a clear sustainability strategy may undermine customer trust and potentially limit the Group's competitive position.	risk	medium-term	own sites
	Increasing and evolving ESG requirements from national and international regulations put pressure on RWH Group to adapt its sustainability practices and strategic orientation, requiring additional investments in personnel, expertise, and systems.	risk	medium-term	own sites
	Risk of loss of trust among stakeholders due to non-compliance with regulatory requirements.	risk	medium-term	own sites
Management of relationships with suppliers	High dependence on raw material availability and quality, combined with insufficient risk management of suppliers, can lead to significant financial impacts.	risk	medium-term	own sites
Corruption and bribery	Cases of corruption or bribery can cause significant reputational damage to the Group and may result in substantial financial costs.	risk	medium-term	own sites

4.1.2 Business Conduct and Corporate Culture (ESRS G1-1)

Employees of RWH Group are expected to act with honesty and transparency in accordance with the Code of Conduct implemented at ESW/RWH, VALJI and DONAKO and according to the MCC Handbook at MCC. All employees are responsible for adhering to these standards and for contributing to a corporate culture based on integrity, tolerance, and responsible business conduct. Information on the competence and expertise of the administrative, management and supervisory bodies in relation to corporate governance aspects is provided in Chapter *1.2.3*. Over the past years, RWH Group has further developed its Compliance Management System, developed by the RWH Chief Compliance Officer (CCO), to prevent misconduct, minimize compliance risks and protect employees. Training in corporate governance and compliance-related topics supports employees in understanding the expected standards of conduct and contributes to a working environment in which concerns can be raised, and potential misconduct can be reported in a safe manner. RWH Group also expects its suppliers to adhere to high professional and ethical standards according to the Supplier Code of Conduct, which is currently being roll-out across the Group and currently implemented at ESW/RWH. Therefore, adherence to principles of responsible business conduct is not only expected within the Group's own operations but also from our suppliers along the value chain.

4.1.3 Management of material IROs (ESRS G1-1, G1-2, G1-3, G1-4)

Policies, strategies and concepts (G1-1)

RWH Group has identified several governance-related impacts, risks and opportunities (IROs) related to business conduct and corporate culture. Key risks include potential reputational and financial impacts arising from non-compliance with regulatory requirements, which may result in a loss of trust among stakeholders. In addition, the absence of clearly defined corporate and sustainability strategies may weaken credibility with customers and negatively affect the Group's competitive position. Further governance-related risks arise in connection with business relationships across the value chain. The globally interconnected iron & steel supply chain entails an ongoing risk of labor and human rights violations in the upstream value chain as well as negative impacts caused by GHG emissions arising from upstream processes (extraction, processing, transportation) in connection with raw materials. Dependence on the availability and quality of raw materials and insufficient supplier risk management may also result in financial impacts. In addition, increasing regulatory requirements and customer expectations related to sustainable supply chain management and carbon metrics reporting create pressure to provide reliable ESG-related information. Failure to adequately respond to such requirements may negatively affect the Group's reputation and competitiveness. The Group has also identified risks related to corruption and bribery, which may lead to significant reputational and financial damage. Functions that are subject to elevated corruption and bribery risks are sales and procurement functions as a result of their tasks and responsibilities, as well as administrative and management functions. Inadequate protection mechanisms for whistleblowers may also pose risks in relation to business conduct, as they can discourage the reporting of misconduct and expose whistleblowers to physical or psychological harm. To address and manage these risks, RWH Group has established a Compliance Management System (CMS) with a set of policies and governance frameworks aimed at promoting responsible business conduct, strengthening corporate culture, and ensuring compliance with applicable legal and ethical standards. At Group level, the Compliance Management System defines the overarching legal and governance framework through the respective policies. Based on these policies, entities implement the necessary processes and instructions locally in accordance with applicable national requirements and organizational structures. The Group Compliance Management System therefore focuses on defining and maintaining the overarching policy framework, ensuring their regular review and update and supporting their rollout across the entities. Legal and regulatory requirements are systematically monitored within the Group by the Chief Compliance Officer through externally sourced compliance updates. Changes and new requirements within these compliance updates are analyzed and considered in the development of new and the revision of existing policies. Where necessary, new regulatory developments trigger the introduction of new policies to ensure ongoing compliance with applicable legal requirements. The execution of related policy training in line with the defined training intervals is carried out locally under the responsibility of the respective entities and local Compliance Officers. A centralized platform for the publication of policies is currently not in place. Policies are made available to employees within the entities through different channels, including applications (e.g. "ESW app"), entity intranet (e.g. at DONAKO) and displayed in print at the respective sites (e.g. at VALJI and MCC). At present, policies are not yet made available uniformly across all entity websites for external stakeholders. Within this governance framework, several additional internal instruments in the entities structure the hierarchy of rules and procedures across the Group (e.g., works agreements, management handbooks, or procedural and work instructions at ESW below). No significant additional financial resources beyond the currently allocated financial resources are allocated to the action plan regarding the further development

of the Group Compliance Management System and associated measures defined for ESRS G1.

Policies (Group CMS): The local Code of Conduct (see also Chapter *3.1.4*) within the entities define the key principles governing compliance with laws and international regulations, equal treatment, respect and fair conduct, fair competition, the prevention of corruption, bribery and money laundering, the management of conflicts of interest, the handling of donations and sponsorships, environmental and climate protection, occupational health and safety, the protection of property rights, integrity and communication and data protection within the Group. In addition to Code of Conduct and its core principles, specific topics are addressed in dedicated policies (see table "Policies in connection with business conduct" below).

Works agreements (only for ESW, VALJI, DONAKO): Where applicable, works agreements represent the highest level in the hierarchy of applicable internal documents. These written agreements are concluded between the Management and the works councils within the respective entities and are only permissible where provided by law or collective agreements and are legally binding.

Management handbook & procedural instructions and work instructions: Following the requirements of management systems (ISO9001 at all entities, ISO14001 at ESW, VALJI and DONAKO and ISO45001 at DONAKO), management manuals and procedural instructions are established locally in all entities to operationalize the policies and overarching guidelines while taking local operational and regulatory requirements into account. These documents are not standardized at Group level and are maintained, reviewed and updated by the responsible departments within each entity as part of their respective management systems.

Current policy framework

Coordination and oversight of all group-wide policies are centrally managed by the Chief Compliance Officer (CCO) of RWH Group. Within the framework of the established Compliance Management System (CMS), all policies, whether currently valid, under implementation or in planning, are systematically managed. The CCO develops the content of new policies in close consultation with the relevant departments and RWH Management. The Group's established practice is to first develop and publish policies for the ESW/RWH entity. These are then rolled-out to other entities through a coordinated process by the CCO. This approach is based on organizational considerations, as the CCO is located at ESW and manages the group-wide governance processes from this location. Once approved by RWH Management, the policies are distributed to the other entities. The entities review the drafts for necessary adjustments, considering local legal requirements and implementing the final versions in coordination with the CCO. Subsequent training and communication of the content to employees in the respective entities is conducted by the local compliance officers. Training in individual subject areas is conducted on a two-year cycle, meaning that each employee should receive training on the relevant topics and policies every two years. As part of the preparations for the consolidated sustainability statement, an analysis was conducted by the RWH ESG & CSR Management and the CCO to determine which key topics are already covered by existing policies in accordance with the ESRS, and which areas require further development, such as the implementation of an ESG Policy specifically addressing ESG-related IROs. The Group's policy framework is continuously developed and updated in line with regulatory requirements. The policies on business conduct issued in the following table "Policies in connection with business conduct" are currently in force, in the roll-out or drafting stage as referenced in the column "Status."

Policies in connection with business conduct

Policy name	Content description	Scope of policy	Status	Covered IROs in G1
Code of Conduct	Basis for the legally, morally, and ethically correct behavior of all employees within the respective entity.	All employees, including management and executive positions of the respective entity	● ESW/RWH ● DONAKO ● VALJI ● MCC *(covered in MCC handbook)*	IROs in connection with *Corporate Culture*
Supplier Code of Conduct	Basis for responsible, lawful, and ethical conduct of our suppliers, including respect for human rights, environmental protection, health and safety and fair working conditions.	All employees, including management and executive positions of the respective entity and its suppliers	● ESW/RWH ▲ DONAKO ▲ VALJI ■ MCC	IROs in connection with *Management of relationships with suppliers*
Policy Whistleblowing (Group Policy)	Basis for the technical and organizational implementation of whistleblower protection within RWH Group.	All employees within RWH Group and its entities, including management and executive positions and external stakeholders (e.g., suppliers, customers etc.)	● ESW/RWH ● DON ● VALJ ● MCC	IROs in connection with *Protection of whistleblowers*
Corruption, embezzlement, fraud and bribery	Basis for ensuring that employees, management and executive positions, and business partners act in accordance with the highest ethical standards and actively prevent fraud, corruption, breach of trust, and bribery across all business relationships within and outside the entity.	All employees, including management and executive positions of the respective entity	● ESW/RWH ▲ DONAKO ▲ VALJI ● MCC	IROs in connection with *Corruption and bribery*
Data protection for employees	Basis for informing employees, business partners, and public authorities about how and why personal data is processed, the legal basis for such processing, and the rights of data subjects in relation to the handling of personal data.	All employees, including management and executive positions and employees of business partners and public bodies, whose personal data is processed in the context of business cooperation with the respective entity	● ESW/RWH ▲ DONAKO ▲ VALJI ● MCC	IROs in connection with *Corporate Culture*
Money laundering and terrorism financing	Basis for establishing principles and procedures to prevent money laundering and terrorist financing and to ensure compliance with all related legal requirements, as part of the Group's commitment to ethical business conduct.	All employees, including management and executive positions of the respective entity	● ESW/RWH ▲ DONAKO ▲ VALJI ● MCC	IROs in connection with *Corporate Culture*
Trade secrets	Basis for establishing procedures and measures to protect trade secrets and confidential information within the respective entity.	All employees, including management and executive positions, as well as all natural and legal people in a contractual relationship with the Group who may have access to trade secrets, data, information, or documents classified as confidential	● ESW/RWH ▲ DONAKO ▲ VALJI ● MCC	IROs in connection with *Corporate Culture*
Conflict of interests	Basis for establishing principles and procedures to prevent, identify, disclose, and appropriately manage conflicts of interest in accordance with international anti-corruption standards.	All applicants, employees, affiliated entities, contractors, and third parties working with or for the respective entity	● ESW/RWH ▲ DONAKO ● VALJI ● MCC	IROs in connection with *Corporate Culture* and *Corruption and bribery*

Unfair competition	Basis for ensuring compliance with the principles of fair competition and preventing unfair business practices that violate applicable competition laws or distort competition, including activities that may result in legal claims such as injunctions or damages.	All employees, including management and executive positions of the respective entity	● ESW/RWH ▲ DONAKO ▲ VALJI ● MCC	IROs in connection with *Corporate Culture*
Competition and Antitrust	Basis for compliance with applicable competition and antitrust laws by establishing principles and expectations that help employees avoid practices that may create competition law risks.	All employees, including management and executive positions of the respective entity	● ESW/RWH ▲ DONAKO ● VALJI ● MCC	IROs in connection with *Corporate Culture*
Sustainability (ESG)	Basis for promoting sustainable development by establishing principles and guidelines that support responsible business conduct and the prevention of ESG risks.	All employees, including management and executive positions of the respective entity as well as external partners operating within the sphere of influence of the respective entity	● ESW/RWH ■ DONAKO ■ VALJI ■ MCC	IROs in connection with *Corporate Culture* and *Management of relationships with suppliers*
Dealing with Artificial Intelligence (AI)	Basis for the responsible and legally compliant use of artificial intelligence by establishing principles, guidance, and responsibilities for employees to manage legal, data protection, intellectual property, and confidentiality risks when using AI tools.	All employees, including management and executive positions of the respective entity	ESW/RWH ▲ DONAKO ● VALJI ● MCC	IROs in connection with *Corporate Culture*
Export controls and US-trade controls and EU compliance (OFAC and EU sanctions)	Basis for ensuring compliance with national and international export control, sanctions, and trade regulations by establishing principles and procedures governing the export and import of goods, technologies and services and promoting ethical sourcing practices within the supply chain.	All employees, including management and executive positions of the respective entity	▲ ESW ■ DONAKO ■ VALJI ■ MCC	IROs in connection with *Corporate Culture* and *Management of relationships with suppliers*

Legend ● Local policy approved and signed ▲ Local policy draft created/legal coordination pending ■ Policy draft creation not yet started

Measures and activities (ESRS G1-2, G1-3, G1-4)

Whistleblowing and investigation procedures: To ensure the integrity of RWH Group, central reporting channels have been established that are accessible to internal and external stakeholders (see also Chapter *3.1.4, Remediation (S1-3)*). Every report is reviewed for its validity by the designated Compliance Officers. If a report is found to be valid, appropriate follow-up measures, such as internal investigations or further inquiries, are initiated promptly. If a report does not fall within the scope of the policy, is unfounded or false, the Compliance Officer is not required to take further steps and will inform the whistleblower accordingly. Compliance Officers are free from instructions regarding the receipt and follow-up of reports to ensure an objective and independent process. Through respective organizational measures, independence and impartiality of these employees is maintained, allowing the Compliance Officers to act without bias. RWH Group is committed to a high standard of whistleblower protection in accordance with Directive (EU) 2019/1937. The Group ensures that incoming reports are documented and that receipt is confirmed in writing within seven calendar days. Upon the whistleblower's request, an oral meeting regarding the report must be arranged no later than 14 calendar days. Within three months of receiving a report, the whistleblower is informed about the follow-up measures taken or intended, or the reasons why the report is not being further pursued. Furthermore, the Group strictly prohibits any form of retaliation. Any measures taken in retaliation for a legitimate report, such as suspension, termination, non-renewal of a fixed-term contract, demotion, or denial of promotion, are legally void. In such cases, the employer is obliged to restore the lawful state and provide compensation for any monetary loss or personal impairment suffered.

Management of relationships with suppliers (G1-2): While supplier management is implemented locally within each entity, the Group continues to establish a common framework to ensure that all suppliers adhere to the same high standards of fair and transparent business conduct, including anti-corruption practices, as well as the promotion of human, labor, and social rights. This is reflected in the continuous development of the compliance management system and specifically the roll-out of the Supplier Code of Conduct within all entities as outlined in Chapter *3.2.4, Supplier Code of Conduct (ESW)*. As stated in Chapter *3.2.2*, the Group has significant potential for improvement in the area of supply chain due diligence, which we are continuously working on by aligning our processes with industry's best practices and continuously enhancing our framework to meet due diligence obligations. Important ongoing measures in this regard represent the stated continuous development of the compliance management system, supplier management carried out through regular supplier evaluations, additional development of tools and controls:

- Supplier evaluation: Supplier evaluation and development processes are implemented independently within the procurement management of each entity and may therefore vary in their specific design and execution. In general, suppliers are assessed on an annual basis against a range of criteria to monitor and evaluate their performance. These assessments typically cover general procurement criteria, such as price, delivery reliability and customer support, as well as quality-related aspects, including material quality, complaint handling and service quality. In addition, the existence and maturity of relevant management systems, such as ISO9001, ISO14001 and ISO45001 certifications, are considered where applicable. The evaluations support the continuous monitoring of supplier performance, the identification of improvement opportunities and the development of long-term, reliable supplier relationships.
- Raw material risk analysis (currently piloted at ESW): To enhance transparency of supply chain risks and support the long-term development of supplier relationships, ESW initiated the development of a raw material risk analysis in 2025. The analysis complements the existing supplier evaluation process and focuses on key raw materials such as pig iron, alloys and scrap. It assesses country-level risks, taking into account sourcing volumes and supplier structures, and supports the identification of mitigation measures, such as diversifying suppliers for critical raw materials or sourcing from countries with lower risk profiles. The results also provide a basis for engaging with suppliers on risk mitigation, strengthening supply chain resilience and fostering long-term, reliable business relationships. The assessment is intended to be updated annually, including a review of sourcing data, countries of origin, suppliers and the effectiveness of implemented mitigation measures. Following its initial development at ESW in 2025, the methodology is currently being tested to evaluate data availability, effectiveness and practical applicability. Subject to the successful completion of the pilot phase by the end of 2026, the Group plans to roll out the approach to additional entities from 2027 onwards.

With these measures, the objective is to achieve improvements together with suppliers across all three dimensions (E, S and G) in line with our standards. Additionally measures to contribute to GHG emissions reduction within the supply chain are implemented as stated Chapter *2.1.2, Transition plan for climate change mitigation (ESRS E1-1)* and Chapter *2.1.3, Measures and activities (ESRS E1-3)*.

Prevention and detection of corruption and bribery (G1-3): RWH Group has a strict zero-tolerance policy for any form of corruption or bribery as set out in the Code of Conduct. To support this commitment, RWH has implemented a dedicated policy addressing corruption, embezzlement, fraud, and bribery. An assessment of the policy against the United Nations Convention against Corruption (UNCAC) has not yet been conducted and is scheduled to be performed during the next policy review cycle. The objective of this policy is to ensure that all employees, executive management, and business partners act in accordance with the Group's high ethical standards and that corruption, embezzlement, fraud, or bribery is prevented or uncovered. The policy further defines how potential indicators and warning signs related to corruption and bribery can be identified and provides clear guidance on reporting channels for actual

or suspected violations (Policy Whistleblowing) and outlines the protection mechanisms in place for whistleblowers. All reported or suspected cases of corruption and bribery are subject to those defined investigation procedures within the Group's compliance management system. Investigations are conducted independently by designated compliance personnel who are not subject to instructions in relation to the handling of reports, ensuring impartiality and objectivity. Depending on the nature and severity of the case, appropriate corrective and disciplinary measures are taken. Violations of the policy may result in severe consequences, including immediate termination of employment and potential criminal prosecution. In addition, the Group reserves the right to take legal action in the event of violations of applicable laws and regulations. During the reporting period, no confirmed cases, convictions, and no fines for violations of anti-corruption and anti-bribery laws were recorded within RWH Group. As part of compliance management, employees of RWH are trained and sensitized on anti-corruption and anti-bribery topics. Certain functions are the primary focus, although the topic is highly relevant for all employees. Functions that are subject to elevated corruption and bribery risks are sales and procurement functions as a result of their tasks and responsibilities, including administrative and management functions. Due to their role in financial transactions and interactions with external stakeholders, these functions are considered to be most at-risk regarding corruption and bribery. Anti-corruption and anti-bribery training is provided to employees in functions-at-risk following the rollout of the respective policies. In 2025, 22% of functions-at-risk across the Group participated in training covering the policy on corruption, embezzlement, fraud, and bribery. As of the reporting year, the policy has only been rolled out at ESW/RWH and MCC. At ESW, 63% of functions-at-risk completed the related training, while the remaining employees are scheduled to be trained within the defined two-year cycle. At MCC, no training had been conducted as of 2025, as the policy was introduced for the first time during the reporting year; corresponding training is planned within the same two-year cycle following the rollout. For the remaining entities, training for functions-at-risk will be implemented once the policy has been rolled out locally. The training program covers key policy principles, relevant risk areas, and expected standards of conduct. RWH Management is informed by the CCO about the training progress and policy roll-out. The CCO regularly informs RWH Management and on the status of the policy roll-out and training completion rates within the entities.

4.1.4 Targets (ESRS G1-1, G1-2, G1-3, G1-4)

To strengthen responsible business conduct and ensure compliance with applicable legal and regulatory requirements, the Group has defined governance-related targets focusing on the continuous development of the compliance management system, by tracking the rollout of key policies, and the prevention of compliance violations across all entities.

Targets

Target	Target (year)	Note
Target of completing the roll-out of the ESG Policy in the entities VALJI, DONAKO and MCC (combined target for S1, S2 and G1) until end of 2027 including training of employees	end of 2027	No progress disclosure in first reporting year
Target of completing the roll-out of the Supplier Code of Conduct in the entities VALJI, DONAKO and MCC until the end of 2027 including training of employees (combined target for S2 and G1)	end of 2027	No progress disclosure in first reporting year
Target of zero compliance violations in 2026	2026 and continuous	No progress disclosure in first reporting year

Information

ESRS INDEX (ESRS 2 IRO-2)
ESRS 2 – ANNEX B (ESRS 2 IRO-2)
List of Abbreviations and Glossary
Independent Assurance Report
Contact/Imprint

ESRS Index (ESRS 2 IRO-2)

ESRS standard	Disclosure requirement	page reference/ not material /phase-in
ESRS 2 – General information		
BP-1	General basis for the preparation of sustainability statements	6
BP-2	Disclosures in relation to specific circumstances	6
GOV-1	The role of the administrative, management and supervisory bodies	12
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	12
GOV-3	Integration of sustainability-related performance in incentive schemes	14
GOV-4	Statement on due diligence	16
GOV-5	Risk management and internal controls over sustainability reporting	19
SBM-1	Strategy, business model and value chain	9
SBM-2	Interests and views of stakeholders	22, 55, 67
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	31, 55, 66
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	22, 33, 43, 48, 55, 67
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	26
ESRS E1 – Climate change		
E1-1	Transition plan for climate change mitigation	31
E1-2	Policies related to climate change mitigation and adaptation	34
E1-3	Actions and resources in relation to climate change policies	34
E1-4	Targets related to climate change mitigation and adaptation	35
E1-5	Energy consumption and mix	38
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	40
E1-7	Removal of greenhouse gases and projects to reduce greenhouse gases, financed via CO_2 certificates	not material
E1-8	Internal carbon pricing	not material
E1-9	Expected financial effects of material physical and transitional risks and potential climate-related opportunities	phase-in
ESRS E2 – Pollution		
E2-1	Policies related to pollution	43
E2-2	Actions and resources related to pollution	44
E2-3	Targets related to pollution	44
E2-4	Pollution of air, water and soil	not material
E2-5	Substances of concern and substances of very high concern	45
E2-6	Anticipated financial effects from pollution-related risks and opportunities	not material

ESRS standard	Disclosure requirement	page reference/ not material /phase-in
ESRS E3 – Water and marine resources		
E3-1	Policies related to water and marine resources	not material
E3-2	Actions and resources related to water and marine resources	not material
E3-3	Targets related to water and marine resources	not material
E3-4	Water consumption	not material
E3-5	Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	not material
ESRS E4 – Biodiversity and ecosystem		
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	not material
E4-2	Policies related to biodiversity and ecosystems	not material
E4-3	Actions and resources related to biodiversity and ecosystems	not material
E4-4	Targets related to biodiversity and ecosystems	not material
E4-5	Impact metrics related to biodiversity and ecosystems change	not material
E4-6	Anticipated financial effects from impacts, risks and opportunities related to biodiversity and ecosystems change	not material
ESRS E5 – Resource use and circular economy		
E5-1	Policies related to resource use and circular economy	*48*
E5-2	Actions and resources related to resource use and circular economy	*48*
E5-3	Targets related to resource use and circular economy	*50*
E5-4	Resource inflows	*51*
E5-5	Resource outflows	*52*
E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	phase-in
ESRS S1 – Own workforce		
S1-1	Policies related to own workforce	*56*
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	*55*
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	*58*
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	*58*
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	*61*
S1-6	Characteristics of the undertaking's employees	*62*
S1-7	Characteristics of non-employees in the undertaking's own workforce	*62*, phase-in (material, but no disclosure in first reporting year)
S1-8	Collective bargaining coverage and social dialogue	*63*
S1-9	Diversity metrics	not material
S1-10	Adequate wages	*64*
S1-11	Social protection	not material
S1-12	People with disabilities	not material
S1-13	Training and skills development metrics	*64*, phase-in (material, but no disclosure in first reporting year)
S1-14	Health and safety metrics	*64*

ESRS standard	Disclosure requirement	page reference/ not material /phase-in
S1-15	Work-life balance metrics	not material
S1-16	Remuneration metrics (pay gap and total remuneration)	*65*
S1-17	Incidents, complaints and severe human rights impacts	*65*
ESRS S2 – Workers in the value chain		
S2-1	Policies related to value chain workers	*67*
S2-2	Processes for engaging with value chain workers about impacts	*67*
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	*69*
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 action	*69*
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	*69*
ESRS S3 – Affected communities		
S3-1	Policies related to affected communities	not material
S3-2	Processes for engaging with affected communities about impacts	not material
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	not material
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	not material
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	not material
ESRS S4 – Consumers and end-users		
S4-1	Policies related to consumers and end-users	not material
S4-2	Processes for engaging with consumers and end-users about impacts	not material
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	not material
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	not material
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	not material
ESRS G1 – Business conduct		
G1-1	Business conduct policies and corporate culture	*73*
G1-2	Management of relationships with suppliers	*76*
G1-3	Prevention and detection of corruption and bribery	*76*
G1-4	Incidents of corruption or bribery	*77*
G1-5	Political influence and lobbying activities	not material
G1-6	Payment practices	not material

ESRS 2 – Annex B (ESRS 2 IRO-2)

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference / EU Climate Law reference	Chapter reference / not material
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 5, Annex II	*1.2.3 Organizational integration of sustainability*
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Commission Delegated Regulation (EU) 2020/1816, Annex II	*1.2.3 Organizational integration of sustainability*
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1			*1.2.4 Sustainability strategy and due diligence*
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/24536 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Commission Delegated Regulation (EU) 2020/1816, Annex II	not material
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II	not material
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/18187, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	not material
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	not material
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14			Regulation (EU) 2021/1119, Article 2(1)	*2.1.2 Interaction with strategy and business model (ESRS 2 SBM-3, GOV-3, E1-1)*
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013 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	not material
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulating (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	*2.1.4 Targets (ESRS E1-4)*

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference / EU Climate Law reference	Chapter reference / not material
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator number 5 Table #2 of Annex 1			*2.1.5 Metrics (ESRS E1-5, E1-6)*
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1			*2.1.5 Metrics (ESRS E1-5, E1-6)*
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1			*2.1.5 Metrics (ESRS E1-5, E1-6)*
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicator 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, emission and residual maturity	Delegation Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)	*2.1.5 Metrics (ESRS E1-5, E1-6)*
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 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)	*2.1.5 Metrics (ESRS E1-5, E1-6)*
ESRS E1-7 GHG removals and carbon credits paragraph 56			Regulation (EU) 2021/1119, Article 2(1)	not material
ESRS E1-9 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	phase-in (material, but no disclosure in first reporting year)
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) Location of significant assets at material physical risk paragraph 66 (c)		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		phase-in (material, but no disclosure in first reporting year)
ESRS E1-9 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) 20022/2453 paragraph 34; Template 2: Banking book –Climate change transition risk: Loans collateralized by immovable property – Energy efficiency of the collateral		not material

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference / EU Climate Law reference	Chapter reference / not material
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Commission Delegated Regulation (EU) 2020/1818, Annex II	phase-in (material, but no disclosure in first reporting year)
ESRS E2-4 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			not material
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1			not material
ESRS E3-1 Dedicated policy, paragraph 13	Indicator number 8 Table #2 of Annex 1			not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1			not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1			not material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1			not material
ESRS 2 – IRO-1 – E4 paragraph 16(a) i	Indicator number 7 Table #1 of Annex 1			not material
ESRS 2 – IRO-1 – E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1			not material
ESRS 2 – IRO-1 – E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1			not material
ESRS E4-2 Sustainable land/agriculture practices or policies paragraph 24(b)	Indicator number 11 Table #2 of Annex 1			not material
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1			not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1			not material

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference / EU Climate Law reference	Chapter reference / not material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1			*2.3.4 Metrics (ESRS E5-4, E5-5)*
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1			*2.3.4 Metrics (ESRS E5-4, E5-5)*
ESRS 2 SBM-3 – S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex 1			not material
ESRS 2 SBM-3 – S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex 1			not material
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			*3.1.4 Management of material IROs (ESRS S1-1, S1-3, S1-4)*
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8 paragraph 21			Commission Delegated Regulation (EU) 2020/1816 Annex II	*3.1.4 Management of material IROs (ESRS S1-1, S1-3, S1-4)*
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex 1			*3.1.4 Management of material IROs (ESRS S1-1, S1-3, S1-4)*
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex 1			*3.1.4 Management of material IROs (ESRS S1-1, S1-3, S1-4)*
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex 1			*3.1.4 Management of material IROs (ESRS S1-1, S1-3, S1-4)*
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II	*3.1.6 Metrics*
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex 1			*3.1.6 Metrics*
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II	*3.1.6 Metrics*
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex 1			not material
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex 1			*3.1.6 Metrics*

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference / EU Climate Law reference	Chapter reference / not material
ESRS S1-17 Incidents of discrimination paragraph 103 (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)	*3.1.6 Metrics*
ESRS 2 SBM-3 – S2 Significant risk of child labour or forced labour in the value chainparagraph 11 (b)	Indicators number 12 and number 13 Table #3 of Annex 1			*3.2.2 Interaction with strategy and business model (ESRS 2 SBM-3)* *3.2.4 Management of material IROs (ESRS S2-1)*
ESRS S2-1 Human rights policy commitment paragraph 17	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1			*3.2.4 Management of material IROs (ESRS S2-1)*
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicators number 11 and 4 Table #3 of Annex 1			*3.2.4 Management of material IROs (ESRS S2-1)*
ESRS S2-1 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)	*3.2.4 Management of material IROs (ESRS S2-1)*
ESRS S2-1 Due diligence policies on issues adressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Commission Delegated Regulation (EU) 2020/1816, Annex II	*3.2.4 Management of material IROs (ESRS S2-1)*
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1			*3.2.4 Management of material IROs (ESRS S2-1)*
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1			not material
ESRS S3-1 Non- respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	not material
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1			not material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1			not material
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights 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)	not material

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference / EU Climate Law reference	Chapter reference / not material
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1			not material
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1			*4.1.3 Management of material IROs (ESRS G1-1, G1-2, G1-3, G1-4)*
ESRS G1-1 Protection of whistleblowers paragraph 10 (b)	Indicator number 6 Table #3 of Annex 1			*4.1.3 Management of material IROs (ESRS G1-1, G1-2, G1-3, G1-4)*
ESRS G1-4 Fines for violation of anti- corruption and anti-bribery laws, paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II	*4.1.3 Management of material IROs (ESRS G1-1, G1-2, G1-3, G1-4)*
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1			*4.1.3 Management of material IROs (ESRS G1-1, G1-2, G1-3, G1-4)*

List of abbreviations and glossary

ATLAS OKOLJA	Slovenian Environmental Atlas for the analysis of environmental indicators of the *Slovenian Environment Agency (ATLAS OKOLJA)*
CCF	Corporate Carbon Footprint
CCO	Chief Compliance Officer
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CLIMAMAP	*Climate Change Impact Maps for Austrian Regions* of *GeoSphere Austria - Federal Institute for Geology, Geophysics, Climatology and Meteorology*
CO_2e	CO_2 equivalent, standardized unit for the calculation of greenhouse gas emissions
CPI	*Corruption Perception Index, Transparency International*
CTO	Chief Technical Officer
CSRD	Corporate Sustainability Reporting Directive (*Directive (EU) 2022/2464*)
DEFRA	*Department for Environment, Food & Rural Affairs* (UK)
DMA	Double Materiality Assessment
EEA	European Economic Area
EFRAG	*European Financial Reporting Advisory Group AISBL*
EPI	*Environmental Performance Index*, *Yale Center for Environmental Law & Policy*
ESRS	European Sustainability Reporting Standards (*Commission Delegated Regulation (EU) 2023/2772*)
EU ETS	*European Union Emissions Trading System*
GeoSphere	*GeoSphere Austria - Federal Institute for Geology, Geophysics, Climatology and Meteorology*
GHG	*Greenhouse gas*
GHG Protocol	*Greenhouse Gas Protocol*, Standard for GHG accounting by the *World Resources Institute* and the *World Business Council for Sustainable Development.*
HORA	*Natural Hazard Overview & Risk Assessment Austria*, *Federal Ministry Agriculture and Forestry, Climate and Environmental Protection,Regions and Water Management*
HR	Human Resources
IPCC	*Intergovernmental Penal on Climate Change*, intergovernmental body of the *United Nations*
IRO	Impacts, Risks and Opportunities
KPI	Key Performance Indicator
OHS	Operational Health and Safety
PEF	Product Environmental Footprint
SBTi	*Science Based Target Initiative*, corporate climate action organization developing standards and guidance for setting science-based targets to reduce GHG emissions
SDS	Safety Data Sheet
TRIFR	Total Recordable Injury Frequency Rate corresponding to the ESRS metric Rate of recordable work-related accidents
UGB	The Austrian Business Code (*Unternehmensgesetzbuch*)
UNCAC	United Nations Convention against Corruption
WGI	*Worldwide Governance Indicators* of the *World Bank Group*
WWF Risk Filter	*Corporate and portfolio-level screening tool* of the *World Wide Fund for Nature (WWF)* for biodiversity and water related risks

Report on the independent audit of the consolidated sustainability reporting

We have performed a limited assurance engagement on the consolidated sustainability reporting of Rudolf Weinberger Holding GmbH for the financial year ending on 31 December 2025, included in a sustainability report and prepared applying the European Sustainability Reporting Standards (ESRS).

Summarised Assessment on the Basis of a Limited Assurance Engagement

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the consolidated sustainability reporting is not, in all material respects, in accordance with the applicable criteria, in particular

- compliance with the European Sustainability Reporting Standards (hereinafter ESRS), and
- the performance of the process to identify the information required to be reported under ESRS (hereinafter the "materiality analysis process") and its presentation in section 1.3 of the consolidated sustainability reporting.

Basis for the Summarised Assessment

We conducted our limited assurance engagement in compliance with the statutory provisions and in accordance with Austrian Standards on Other Assurance Engagements (KFS/PG13) and the Statement on Selected Issues in the Audit of Sustainability Reporting (KFS/PE28). The audit procedures for a limited assurance engagement differ in nature and timing from those for a reasonable assurance engagement and are less in scope. Consequently, the level of assurance obtained in a limited assurance engagement is significantly lower than in a reasonable assurance engagement.

Our responsibilities under those requirements and standards are further described in the "Responsibilities of the Auditor of the Consolidated Sustainability Reporting" section of our assurance report.

We are independent of the Group in accordance with Austrian company law and professional requirements, and we have fulfilled our other professional responsibilities in accordance with these requirements.

Our audit organisation is subject to professional regulations that essentially correspond to the requirements of International Standard on Quality Management (ISQM) 1 and applies a comprehensive quality management system, including documented policies and procedures for compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the audit evidence we have obtained up to the date of the assurance report is sufficient and appropriate to provide a basis for our summarised assessment as of that date.

Emphasis of Matter

We draw attention to the disclosures in section 1.1 of the consolidated sustainability report, which explain that, contrary to the requirements of ESRS 1.110, the consolidated sustainability reporting was not included in the Group management report due to the voluntary nature of the reporting. Our summarised assessment has not been modified in this respect.

Other Information

The legal representatives are responsible for the other information. The other information comprises all information included in the consolidated financial statements and in the Group management report.

Our summarised assessment of the consolidated sustainability reporting does not extend to this other information, and we do not express any form of assurance thereon.

In connection with our audit of the consolidated sustainability reporting, our responsibility is to read this other information when it becomes available and, in doing so, to consider whether it is materially inconsistent with the consolidated sustainability reporting or our knowledge obtained in the limited assurance engagement or otherwise appears to be materially misstated.

If, based on the work we have performed on the other information obtained before the date of the assurance report, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this context.

Responsibilities of the Legal Representatives and the Supervisory Board

The legal representatives are responsible for the preparation of the sustainability reporting, including the development and implementation of the materiality analysis process in accordance with the applicable requirements and standards. This responsibility includes

- the identification of actual and potential impacts, as well as risks and opportunities related to sustainability aspects, and the assessment of the materiality of these impacts, risks and opportunities,
- the preparation of the consolidated sustainability reporting in compliance with the statutory requirements, including compliance with ESRS,
- the design, implementation and maintenance of internal controls that the legal representatives consider relevant to enable the preparation of consolidated sustainability reporting that is free from material misstatement, whether due to fraud or error, and the performance of the materiality analysis process in accordance with the requirements of ESRS.

This responsibility also includes the selection and application of appropriate sustainability reporting methods and the use of assumptions and estimates for individual sustainability disclosures that are reasonable in the circumstances.

The Supervisory Board is responsible for monitoring the consolidated sustainability reporting process, including the materiality analysis process, and for reviewing the consolidated sustainability reporting.

Inherent Limitations in the Preparation of Sustainability Reporting

When reporting forward-looking information, the company is obliged to prepare this forward-looking information on the basis of disclosed assumptions about events that could occur in the future and possible future actions by the Group. Actual outcomes are likely to differ, as anticipated events often do not materialise as assumed.

As described in section 1.1.4 of the consolidated sustainability report, several of the disclosed metrics are based on estimates or are subject to a high degree of measurement uncertainty. In reporting greenhouse gas emissions, the scientific basis also plays a decisive role. This can lead to challenges, particularly in determining emission factors, for example when factors are required to combine emissions of different gases for presentation in a uniform unit of measurement such as CO2 equivalents. Incomplete scientific knowledge can therefore result in uncertainties in reporting.

Due to inherent limitations of sustainability reporting, particularly with regard to the collection and reliability of information from the upstream and downstream value chain, not all disclosures can be verified with the same level of assurance. Data provided by suppliers, business partners or other third parties is partly based on their own measurement systems, assumptions and estimates, which we can audit only to a limited extent. As a result, there is a risk that deviations or inaccuracies in reporting cannot be fully ruled out despite appropriate efforts by the company.

Responsibilities of the Auditor of the Consolidated Sustainability Reporting

Our objectives are to obtain limited assurance about whether the consolidated sustainability reporting, including the materiality analysis process presented therein, is free from material misstatement, whether due to fraud or error, and to issue an assurance report that includes our summarised assessment. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the sustainability reporting.

Throughout the limited assurance engagement, we exercise professional judgement and maintain a critical attitude.

Our responsibilities include

- performing risk-related audit procedures, including obtaining an understanding of internal controls relevant to the engagement, to identify representations that are more likely than not to be materially misstated, whether due to fraud or error, but not for the purpose of expressing a summarised assessment on the effectiveness of the Group's internal controls, and
- the development and performance of audit procedures in relation to disclosures in the sustainability reporting where material misstatements are more likely than not.

The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the Work Carried Out

A limited assurance engagement involves performing procedures to obtain evidence about the consolidated sustainability reporting. The nature, timing and scope of audit procedures selected depend on professional judgement, including the identification of disclosures in the sustainability reporting that are likely to be materially misstated, whether due to fraud or error.

In performing our limited assurance engagement with respect to the consolidated sustainability reporting, we proceed as follows:

- We gain an understanding of the Group's procedures that are relevant to the preparation of the sustainability reporting.
- We gain an understanding of the materiality analysis process and assess whether all relevant information identified through the materiality analysis process has been included in the sustainability reporting.
- We assess whether the evidence obtained from our audit procedures on the procedures implemented by the Group is consistent with the description in the disclosure on IRO-1 in accordance with ESRS 2.
- We assess whether the structure and presentation of the sustainability reporting are in accordance with the statutory requirements and ESRS.
- We conduct inquiries of relevant personnel and analytical procedures on selected disclosures in the sustainability reporting.
- We perform results-oriented procedures, on a random sample basis, on selected disclosures in the consolidated sustainability reporting
- We reconcile selected disclosures in the sustainability reporting with the corresponding disclosures in the annual and consolidated financial statements and the other sections of the annual and Group management report.
- We obtain evidence about the presented methods for developing estimates and forward-looking information.

Auditor Responsible for the Engagement

The auditor responsible for the assurance engagement on the sustainability reporting is Mr. MMag. Christoph Zimmel, auditor and tax advisor.

Limitation of Liability and Publication

The limited assurance engagement on the sustainability reporting is a voluntary audit. As our report is prepared exclusively on behalf of and in the interests of the company, it does not form the basis for any reliance by third parties on its content. Claims by third parties can therefore not be derived from it.

We issue this assurance report on the basis of the audit contract concluded with the client, which is also based on the attached General Conditions of Contract for the Public Accounting Professions (AAB 2018) with effect vis-à-vis third parties.

With regard to our responsibility and liability arising from the contractual relationship, point 7 of the AAB 2018 applies.

By way of derogation from point 7 para. 2 of the AAB 2018, our liability for gross negligence towards the company is limited, according to the size characteristics of the company and based on the size classes pursuant to section 221 UGB, applying half of the maximum liability amount pursuant to section 275 para. 2 UGB corresponding to the size class of the company.

The assurance report on the audit may only be made available to third parties together with the consolidated sustainability report and only in complete and unabridged form.

Vienna, 17 June 2026

Grant Thornton Austria Audit GmbH

Wirtschaftsprüfungs- und Steuerberatungsgesellschaft

MMag. Christoph ZIMMEL

Auditor and Tax Advisor

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