

voestalpine ROADMAP OF SUSTAINABILITY ACTIVITIES AND ACTIONS IN THE SUPPLY CHAIN



ESRS S3 AFFECTED COMMUNITIES

This chapter examines the impacts of business activities on local communities. It outlines how the interests and needs of these communities are taken into account and the actions being taken to address both positive and negative impacts.

voestalpine is committed to working closely with affected communities to ensure that their concerns are recognized and addressed at all times. This includes engaging the respective communities in decision-making processes, regular communication on the company's activities, and the implementation of initiatives to improve the quality of life and environmental conditions in the affected areas.

voestalpine's strategy is based on transparency and taking responsibility. Care is taken to ensure that the business activities not only bring economic success, but also make a positive contribution to society. Continuous data collection and ongoing dialogues maintained with communities ensure that their needs are taken into account and that solutions to challenges are jointly developed.

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Affected communities	<ul style="list-style-type: none"> Engagement with affected communities (own Group—Linz, Donawitz, Kapfenberg) 	<p>The communities affected by voestalpine's activities are engaged with through the provision of information (e.g., through the EMAS Environmental Statement for large sites) and their involvement in the company's activities, impacts, and plans. voestalpine also contributes to the social and economic development of local municipalities by creating jobs (Linz, Donawitz, Kapfenberg)</p> <p>As a secure employer, voestalpine ensures economic stability in many communities in the vicinity of its sites</p>

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

S3-1 – Policies related to affected communities

HUMAN RIGHTS

voestalpine is fully committed to upholding human rights in compliance with the International Charter of Human Rights, the UN Principles on Business and Human Rights, the Core Labor Standards of the International Labor Organization (ILO), the OECD Guidelines for Multinational Enterprises, and the UN Global Compact. The Code of Conduct and the Human Rights Policy explicitly reference and adhere to international frameworks.

The principles and requirements for doing business, including the mandatory Code of Conduct for Business Partners, are based on voestalpine's Human Rights Policy and Code of Conduct. For more details on the guidelines, please refer to chapter S1-1 Policies related to own workforce and chapter G1-1 Corporate culture and business conduct policies.

By signing the Code of Conduct for Business Partners as required, voestalpine's business partners confirm their obligation to respect and comply with human rights as fundamental values. This acknowledgment takes place on the basis of the European Convention on Human Rights and the UN Charter.

When developing its Human Rights Policy and training on human rights, voestalpine works with external experts and non-governmental organizations (NGOs) to ensure that the interests of affected communities are taken into account. For more details on human rights training, see chapter S1-1 Policies related to own workforce.

Impact on strategy and business model	Value chain	Time horizon	Affected stakeholders	Key
Improving employer attractiveness and corporate perception	>>>	●●●●	» Local communities	● Actual positive impact
Ensuring economic resilience			» Special interest and advocacy groups	● Actual negative impact
			» NGOs and NPOs	○ Potential positive impact
			» Employees and applicants	○ Potential negative impact
				+ Opportunity
				! Risk
				>>> Upstream
				>>> Own operations
				>>> Downstream
				●○○○ < 1 year
				○●○○ 1–5 years
				○○●○ 5–10 years
				○○○● 10+ years

In the business year 2024/25, no human rights violations or violations of the aforementioned guidelines and guiding principles were reported.

Channels for reporting violations

Evidence of violations of human rights can be reported through several channels: In person to the employee's direct manager, the local HR department or the Group HR department of voestalpine AG, and the executive management; to the Human Rights Officer of voestalpine or using the web-based whistleblower system at <https://www.bkms-system.net/voestalpine>. The latter option permits anonymous reports to be submitted by employees and external persons. For further details, please refer to chapter G1-1 Corporate culture and business conduct policies.

Human Rights Officer

In order to address human rights issues, voestalpine has appointed a Human Rights Officer. Concerns or reports of human rights issues can be sent to the following e-mail addresses: humanrights@voestalpine.com and menschenrechte@voestalpine.com. Messages received are reviewed and forwarded to the responsible departments for further handling.

Indigenous peoples

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

PRINCIPLES AND STRUCTURES OF STAKEHOLDER COMMUNICATION

Transparency, honesty, respect, and confidentiality are the key values on which voestalpine basis its dialogue with stakeholders. The principles of cooperation with affected communities are governed by Group-wide guidelines:

» Code of Conduct for voestalpine's Lobbyists (Lobbying Code of Conduct)

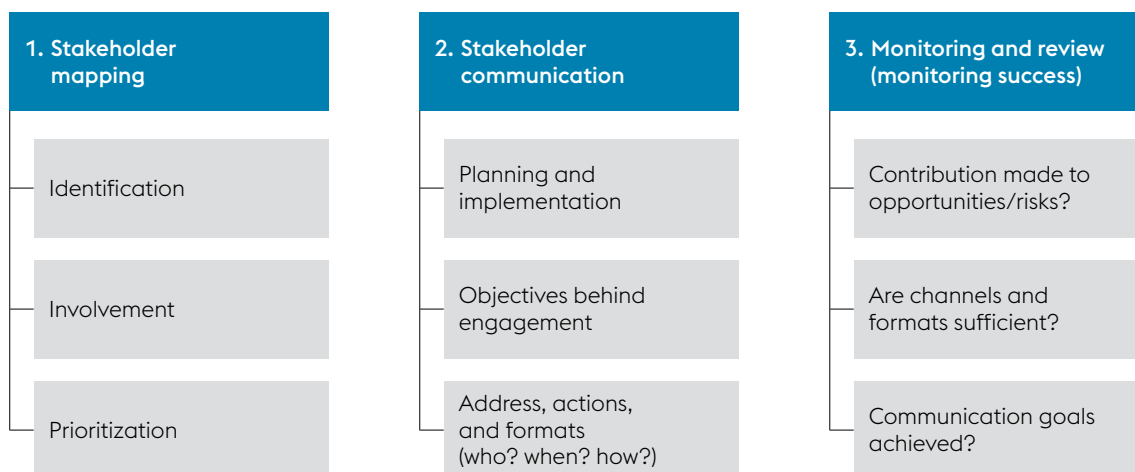
This code sets out clear and transparent rules for the voestalpine's lobbying activities. voestalpine's Lobbying Code of Conduct governs dealings with stakeholders in Austria as well as in Europe and on a global scale in accordance with the Austrian Lobbying and Advocacy Transparency Act.

» Communications policy

The policy sets forth the main aspects of voestalpine's internal and external communications. These include fulfilling the notification obligations incumbent on a listed undertaking, cooperating with the media and the press, communicating directly with affected communities using online and social media channels, and how to handle visits by politicians and business delegations. The policy also contains a separate chapter on crisis communication. Supplementary site-specific process instructions are issued with the aim of facilitating a rapid and situation-appropriate response—especially in the event of a crisis. The process instructions regulate the corresponding procedures and responsibilities for external communication. Responsibility for the development and implementation of these policies lies with the Management Board of voestalpine AG and the departments assigned to it.

A Group-wide stakeholder engagement process is currently in the pipeline and is scheduled for implementation by the end of the business year 2025/26. The aim behind the engagement process is to ensure coordinated stakeholders communication, taking into account the decentralized, global structure of voestalpine.

PRESENTATION OF THE STAKEHOLDER ENGAGEMENT (SIMPLIFIED OVERVIEW):



POLICY OVERVIEW

IROs addressed	Policy	Core content	Scope of the policy	Responsibility and monitoring	Other comments
Engagement with affected communities (own Group—Linz, Donawitz, Kapfenberg)	Communications policy	Internal and external communication, covering the following topics: » Ad hoc publicity » Press and media relations » Online and social media » Visits by politicians and business delegations » Communication in crisis scenarios	Own operations (companies in which voestalpine AG has a direct or indirect holding of 50% or more, or over which it exerts control in another manner)	Responsibility and monitoring: Head of Group Communications	» Takes into account communication with external parties (politician visits, press, media relations, social media, etc.) » Available on the intranet
	Human Rights Policy	Commitment to protecting human rights without exception through adherence to the International Charter of Human Rights, the UN Principles on Business and Human Rights, the ILO Core Labor Standards, and the UN Global Compact Commitment to the right to collective bargaining and freedom of association, compliance with legal labor regulations, abolition of child, forced, and compulsory labor as well as human trafficking and modern slavery, elimination of discrimination, and other human rights issues	Own operations (companies in which voestalpine AG has a direct or indirect holding of 50% or more, or over which it exerts control in another manner) All production companies Own workforce (employees and non-employees) Upstream and downstream value chain (all business partners)	Responsibility and monitoring: Head of Group Sustainability	» Available on the website
	Code of Conduct for voestalpine's Lobbyists (Lobbying Code of Conduct)	Regulates dealings with stakeholders in Austria as well as in Europe and internationally in accordance with the Austrian Lobbying and Advocacy Transparency Act (LobbyG) on the basis of a clear and transparent framework for lobbying activities	Own operations (companies in which voestalpine AG has a direct or indirect holding of 50% or more, or over which it exerts control in another manner) External lobbyists	Responsibility: Management Board/executive management Monitoring and compliance regulations: Compliance organization	» The result of numerous conversations and discussions at the level of the Management Board as well as among executive management and department heads of the voestalpine Group. » The Code of Conduct is reviewed on an ongoing basis and revised where necessary » The Code of Conduct as well as the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, and the core labor standards of the International Labor Organization (ILO) » Available in several languages on the intranet and on the website https://www.voestalpine.com/group/en/group/compliance/

S3-2 – Processes for engaging with affected communities about impacts

A continuous and direct dialogue with local stakeholders is maintained by voestalpine at its locations in Linz, Donawitz, and Kapfenberg. This enables residents and other stakeholders to get involved in retrofitting or expansion activities at an early stage. In certain cases, relevant stakeholders, such as citizens' initiatives, NGOs, political representatives, or the local media, are engaged with directly. Where technically and economically feasible, the results of these discussions are taken into account in specific investment projects.

In addition, event and topic-related as well as periodic exchanges take place across locations with the following stakeholder groups:

Stakeholders	Type of engagement	Frequency of engagement
Local residents	Direct dialogue for questions/complaints (telephone, e-mail) Proactive involvement in larger projects (e.g., projects communicated in advance at information events; media; social media channels)	Event and topic-related
Employees and their representatives	Discussions and communications on the latest transformation topics, policy positions, and shared perspectives and activities; for example, at regular meetings of the works council or on an ad hoc basis for certain topics with regard to current social policy aspects	Periodically, e.g., at works council meetings and events at Group or site level with varying frequency
Legislative and executive powers at national and European level (government, EU Commission, parliaments)	Participation in policy-making through topic-based bilateral outreach and peer review processes; participation in working groups, e.g., in ministries and in the framework of the EU Commission (Directorates-General); topic-based exchange with parliaments (e.g., specialist committees and representatives); participation in dialogue formats (e.g., the EU Commission's Strategic Dialogue on Steel, the site strategy, and the Climate-Neutral Industry initiative in Austria)	Event and topic-related
Political think-tanks; academic and research institutions; civil society and NGOs	Dialog maintained primarily within the framework of current topic and working groups (e.g., Austrian carbon management strategy, hydrogen, electricity market)	Event and topic-related
Legal and voluntary lobbying groups at national and European level	Representation in management and specialist committees, participation in the development of positions and lobbying priorities	Periodic (e.g., quarterly Executive Committee and twice-yearly General Assembly at EUFOER); Event and topic-related
Energy industry and energy-intensive industries	Informal exchange on common topics with the energy industry (e.g., electricity market design, hydrogen) Alliances at national and European level with other energy-intensive companies for joint positioning on key policy issues	Event and topic-related

As an undertaking, voestalpine is actively involved in political processes. Examples include the dialogue round Climate-Neutral Industry launched by the former Austrian Ministry for Climate Protection and the carbon management strategy process pursued by the Austrian Federal Government. In addition, voestalpine regularly participates in public discussions and events, and organizes plant and site visits for stakeholders if necessary. At the European level, voestalpine participated in the Joint Research Center of the EU Commission on Green Steel and participated in the Strategic Dialogue on Steel led by the Commission President in March 2025.

The project “Secure Power Supply for the Central Region of Upper Austria,” which entails upgrading existing 110 kV line infrastructure to 220 kV is one example of engagement with affected communities in the reporting period. In addition to an environmental impact assessment, comprehensive dialogue platforms were held with critical stakeholders, including public information events in Linz. These dialogues were conducted by voestalpine together with Austrian Power Grid (APG), the project promoter. Further discussions took place with network operators, provincial and federal politicians, environmental organizations, and citizen initiatives.

The timely and final approval of the environmental impact assessment by the Federal Administrative Court and, subsequently, the provision of the new power line, provided legal certainty for all parties involved and provided the conditions required for the successful realization of the project. The same applies to the power infrastructure project at the Donawitz site.

The Group Public Affairs department is responsible for the structured stakeholder dialogue. It also plans and coordinates event-related dialogue platforms with local stakeholders. Ultimate responsibility for stakeholder dialogues and their approval lies with the responsible chairperson or member of the Management Board.

Communication with stakeholders is organized Group-wide as an interdisciplinary function. Group Public Affairs works with Group Sustainability, Research & Development, the Group’s energy network, the works council, and other parties to ensure a consistent is maintained external image toward stakeholders. To facilitate this, periodic exchanges take place, for example at recurring meetings with the above-mentioned departments. These formats are not only used for internal coordination, but also to reflect on external perspectives: Insights, concerns, and expectations from the dialogue with stakeholders are incorporated into the technical debates and decision-making processes of the participating departments, where they are processed further. These platforms also help voestalpine to assess the effectiveness of working with affected communities.

In order to train employees, voestalpine provides mandatory training on human rights and compliance (see chapter Disclosure Requirement 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 and chapter G1-3 Prevention and detection of corruption and bribery). Specific training is available for senior executives on sustainability in development.

S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns

A comprehensive set of procedures has been implemented by voestalpine to address negative impacts on affected communities and provide them with a variety of channels for raising concerns, as explained in more detail below.

At all relevant sites, the company is subject to close regulatory monitoring and public scrutiny.

Processes are also in place that are specifically geared toward maintaining dialogues with affected communities—such as local residents. If unforeseen negative impacts occur during normal production and business activities, these site-specific procedures offer affected parties an immediate opportunity to get in touch and provide feedback. Depending on the situation, this involves examining whether there are any legal reporting obligations or whether an in-depth dialogue with the affected groups is necessary. The aim is not only to obtain information, but also to take their concerns seriously and—to the greatest possible extent—to take appropriate action to remedy the situation.

An environmental officer has been appointed at the Linz site since 1985, who is responsible for the legal requirements relating to the protected assets of air, water, soil, and noise. A specially established environmental on-call service therefore ensures that a qualified contact person is available around the clock for environmentally relevant incidents and also for internal and external environmental concerns. Immediate action is taken in line with a site-specific emergency plan together with the task force and, if necessary, the competent authorities are notified.

The on-call service also provides the point of contact for external complaints. Accordingly, any type of complaint will be investigated immediately, action will be taken if necessary, and the complainant will be informed about the status of the complaint if desired. Foreseeable environmental events, such as expected noise or dust emissions, are communicated in advance to the decentralized communication departments and, if necessary, to the media and authorities. External inquiries or complaints reach the environmental on-call service either through internal bodies—such as the switchboard or factory security—or are forwarded by authorities (e.g., Linz municipal authorities or the Upper Austrian Government).

The environmental on-call service centrally documents all incidents and complaints relevant to the environment and the actions taken. The handling of environmental incidents and complaints as well as the associated documentation is reviewed on an annual basis within the framework of an external audit, which ensures the effectiveness of the implemented processes and reporting channels.

In addition, reports can be submitted anonymously using the whistleblower system, which is available in 14 languages. Details on this and an overview of the number of cases can be found in chapter G1-1 Corporate culture and business conduct policies. Complaints can also be submitted using the general e-mail addresses and contact forms on the voestalpine website and on the websites of the respective divisional subsidiaries.

Another communication channel is the Group's social media channels, which are listed under the following link: <https://www.voestalpine.com/group/en/media/social-media>. A social media listening tool is used to monitor the Group's own channels and external comments. Responses to users are provided by Group Communications or commissioned agencies according to a defined process. A platform strategy is in place for each social media channel that is geared toward target groups.

Protection against retaliation is regulated in voestalpine's Code of Conduct. For further details on the Code of Conduct, see chapter G1-1 Corporate culture and business conduct policies.

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

The materiality assessment did not identify any material negative impacts, risks, or opportunities related to affected communities. The focus is therefore on the ongoing expansion of cooperation and dialogue with affected communities in the vicinity of the Austrian voestalpine production sites. Action taken aims to improve early engagement with affected communities in current and planned projects. Due to the Group's decentralized structure, these actions are primarily planned and implemented at the site, company, and divisional level, in each case in coordination with the responsible Group divisions. In addition to executive management at company, divisional, and Group level, the Group Public Affairs, Group Communications, and Legal departments are involved in managing the key IROs.

Examples of effective management in communications with affected communities in the reporting period include the project "Secure Power Supply for the Central Region of Austria" (see chapter S3-2 Processes for engaging with affected communities about impacts) and the construction of the stainless steel plant in Kapfenberg.

As part of the construction of the stainless steel plant in Kapfenberg, various actions have been implemented to take the perspectives of the affected stakeholders into account at an early stage and to be able to respond accordingly. Before the start of construction, a dialogue office was set up to give local residents the opportunity to obtain information directly and to raise any concerns they have. In addition, a telephone hotline and a separate e-mail address were provided.

A dedicated website provided information on the project, supplemented by a local info-point, which included a message box for people without internet access. In addition, information events were organized to enable a timely response to any concerns and suggestions raised by the public.

The actions listed for stakeholder involvement have helped the affected communities to obtain information, raise concerns, and actively participate in shaping the projects. At the same time, uncertainties were reduced and greater acceptance achieved.

In addition to the project-related actions, voestalpine also fulfills its corporate social responsibility throughout the Group. Initiatives in the arts, culture, and sports as well as in the social arena are pursued at the different sites and supported through monetary donations and donations in kind. One special example of this is the voestalpine cares run, which will be held for the third time in spring 2025.

voestalpine CARES RUN—“TOGETHER WE MOVE THE WORLD”

As part of an internal social responsibility program, voestalpine is motivating its employees for the second time to get active in sports, and at the same time do something for a good cause and for their own health. Moreover, voestalpine donates the proceeds to social cooperation partners such as Hilfswerk International, UNICEF, the Red Cross, and Doctors Without Borders. Support received due to joint sporting activities undertaken by voestalpine employees is released in individual stages in an app. In this way, voestalpine unites athletic and charitable engagement. Donations are automatically generated up to an total amount of EUR 700,000 once voestalpine employees have reached a certain number of points.

This means that not only projects in the area surrounding the Austrian production sites can be supported, but also projects in countries such as Brazil and Ukraine, which lie along the value chain of voestalpine. The following projects will be supported in 2025:

» Help Points (Hilfswerk International)

Help Points set up by Hilfswerk International provide low-threshold and immediate support in the areas affected by the war in Ukraine. The centers provide residents with food, everyday products, and psychosocial assistance and counseling for vulnerable people. Children's rooms also create a safe place for children to play and learn. With the contribution from the voestalpine cares run, a Help Point can be operated for about 10 months

» 1 MiO (One Million Opportunities initiative led by UNICEF)

In 2024, the voestalpine cares run continued to support UNICEF's "One Million Opportunities" initiative in Brazil, which provides young people with access to quality education. The focus of this initiative is, among other things, on providing training in entrepreneurial, sustainable, and occupational skills (e.g., training programs in mechanical engineering, logistics, or metal processing). Vocational training courses, workshops, and internships improve young people's chances on the labor market. Around 6,700 young people can be helped thanks to the contribution of the voestalpine cares run

» **Emergency Disaster Relief RISK Kits (Doctors Without Borders)**

In an emergency situation, such as after a natural disaster, the first 72 hours are crucial. For the fastest possible help on the ground, the team at Doctors Without Borders can set up a “mini operating room” at short notice with the help of a rapid intervention surgical kit (RISK kits), even in hard-to-reach areas. All of the kit’s modules fit into a vehicle and enable immediate first aid in crisis or disaster areas. Depending on the emergency situation, they can be adapted to the needs of the medical team with their surgical material and equipment. In one surgical tent, a team of six can perform about five major surgical procedures per day. The voestalpine cares run enables the purchase of two to three RISK kits for Doctors Without Borders

» **Learning centers for children and young people in Austria (Austrian Red Cross)**

The Austrian Red Cross looks after children and young people whose families depend on free learning support at more than 160 locations across Austria. At the 12 Red Cross learning centers, as well as with learning support at schools and other locations (Red Cross district offices, youth centers), Red Cross employees and volunteers offer the support needed to improve educational opportunities and expand horizons for children and young people. Thanks to the voestalpine cares run, around 400 children and young people in the learning centers and at schools can receive support with over 6,000 learning units

» **Toyota Land Cruiser (Doctors Without Borders)**

Conflicts, food crises, and water scarcity are causing acute (medical) emergencies in many countries, such as Tanzania and Chad. Doctors Without Borders uses Toyota Land Cruisers equipped with radio and protective equipment to access the affected areas in case of such emergencies. With the support of the voestalpine cares run, it will be possible to purchase two specially equipped off-road vehicles

» **Digital Learning Centers (UNICEF)**

The learning process of children in Ukraine continues to be severely disrupted by the war. UNICEF now provides secure learning opportunities through 50 Digital Learning Centers (DLC). Children are provided with tablets and laptops, and are given access to formal and non-formal education, including in the frontline regions, provided by qualified teachers. The voestalpine cares run can be used to set up a DLC and continue operation

In order to track the lasting positive impact of these donations on the affected communities, voestalpine receives project reports and final reports from the beneficiary institutions in order to be able to review the impact and use of funds for project management purposes.

HUMAN RIGHTS INCIDENTS

No human rights violations in relation to incidents involving affected communities were reported in the reporting period.

OVERVIEW OF ACTIONS

IROs addressed	Action	Core content and expected results
Engagement with affected communities (own Group—Linz, Donawitz, Kapfenberg)	Package of stakeholder engagement measures	<ul style="list-style-type: none"> » Ongoing stakeholder dialogue with project applicants and local residents » Environmental impact assessments and stakeholder engagement as part of the Austrian Power Grid project “Secure Power Supply for the Central Region of Austria” (e.g., environmental organizations, citizens’ initiatives) » Information events on construction projects » Sponsoring activities, e.g., voestalpine cares run <p>Expected results:</p> <ul style="list-style-type: none"> » Ensuring transparent communication » Adequate consideration of relevant stakeholders

METRICS AND TARGETS

S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

No material negative impacts or risks associated with affected communities were identified during the materiality assessment. Therefore, actions are defined on a site-specific and incident-specific basis if necessary. In addition to the Group-wide strategic goals—in particular in relation to decarbonization and sustainability—there are currently no separate, time-limited, and outcome-oriented targets in relation to affected communities.

Nevertheless, there are indicators to demonstrate successful stakeholder engagement management at voestalpine, such as the evidence of positive economic and social impacts on the environment at its production sites as published on the following website: <https://www.voestalpine.com/oesterreich/de/> (e.g., data on research and development, environment, employment, and tax and social security contributions).

In addition, compliance with the processes is ensured through regular internal and external audits (see chapter S3-3 Processes to remediate negative impacts and channels for affected communities to raise concerns).

A continuous exchange with all relevant stakeholders, as outlined in chapters S3-2 Processes for engaging with affected communities about impacts and S3-3 Processes to remediate negative impacts and channels for affected communities to raise concerns, ensures that concerns and suggestions are addressed at an early stage. The success of the described policies and actions is determined by assessing whether voestalpine has achieved the legal certainty and calculability of its strategic targets at the end of the respective projects.

Time horizon	Scope of the action	Responsibility and monitoring	Significant expenditure (if relevant)	Other comments
Dependent on actions taken 2017 to BY 2025/26	Upstream and downstream value chain to a partial extent	CEO of voestalpine AG	–	Integration of various stakeholder interests