

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

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

The due diligence governance processes comprise several successive steps:

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

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

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

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

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

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

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

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

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

GOV-4: The following table provides an overview of how voestalpine applies the core elements of due diligence for human rights and the environment, and where they are presented in this sustainability report.

## DUE DILIGENCE REFERENCES

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