

CONSOLIDATED NON-FINANCIAL STATEMENT

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GENERAL INFORMATION

ESRS 2

BASIS FOR PREPARATION

BP-1 – General basis for preparation of sustainability statements

This report is a Consolidated Non-Financial Statement in accordance with Section 267a of the Austrian Business Code (*Unternehmensgesetzbuch – UGB*), as amended. This statement has been voluntarily prepared in accordance with European Sustainability Reporting Standards (ESRS). In the following text, the non-financial statement is referred to as the sustainability report.

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

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

If, at a later stage, material impacts, risks, and opportunities from non-fully consolidated subsidiaries are identified, these companies will be included in the scope of the report.

Impacts along the value chain that occur outside of voestalpine's factory gates but are subject to its sphere of influence are regularly evaluated as part of supply chain management and are managed with an eye toward sustainability. The process of the double materiality assessment described in IRO-1 also took into account impacts, risks, and opportunities along both the upstream and downstream value chain of voestalpine. The sections on topic-specific information describe the extent to which voestalpine's policies, actions, targets, and metrics are applied across the value chain.

voestalpine's business policy is based on the principle of transparency. For this reason, the option to exclude certain information from disclosure (see ESRS 1 Section 7.7) has not been exercised in this

sustainability report. This report includes all relevant information; nothing has been withheld on the grounds of confidentiality, including details related to intellectual property, proprietary know-how, or innovation outcomes.

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

BP-2 – Disclosures in relation to specific circumstances

As this is voestalpine's first sustainability report prepared according to ESRSs, a comparison with previous reports, which were prepared on the basis of Global Reporting Initiative (GRI) standards, is not possible. As ESRSs do not require the disclosure of prior-year figures in the first year of reporting, no ESRS-specific figures from the previous year are provided.

This sustainability report also includes information related to the EU Taxonomy. This information is provided in the section on environmental information in the chapter "Disclosures in accordance with the Taxonomy Regulation." The Sustainability and Diversity Improvement Act (*Nachhaltigkeits- und Diversitätsverbesserungsgesetz – NaDiVeG*) has been in effect in Austria since 2016 as the national implementing act for EU Directive 2014/95/EU (the Non-Financial Reporting Directive, NFRD), which mandates the disclosure of non-financial information. This Consolidated Non-Financial Statement has been prepared in accordance with Section 267a of the UGB as amended by the NaDiVeG and forms part of the Group Management Report. In addition, this Consolidated Non-Financial Statement has been voluntarily prepared in accordance with European Sustainability Reporting Standards (ESRS) in preparation for the reporting obligation under the Corporate Sustainability Reporting Directive (CSRD). The disclosed information regarding the EU Taxonomy is in accordance with Regulation (EU) 2020/852, as well as the current delegated regulations and supporting materials.

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

- » short-term: reporting period of one business year
- » medium-term: period from the end of the short-term horizon up to five years
- » long-term: (more than 5 years)
- » long-term: (more than 10 years)

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

VALUE CHAIN ESTIMATION

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

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

» **Scope 3 – Category 1:**

Purchased goods and services

» **Scope 3 – Category 3:**

Fuel and energy-related activities

» **Scope 3 – Category 4:**

Upstream transportation and distribution

» **Scope 3 – Category 5:**

Waste generation

» **Scope 3 – Category 9:**

Downstream transportation and distribution

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

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

SOURCES OF ESTIMATION AND OUTCOME UNCERTAINTY

A certain degree of measurement uncertainty exists for individual parameters, particularly in high-volume measurements related to water and wastewater, as well as in the estimated costs of future environmental regulations.

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

INCORPORATION BY REFERENCE

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

Chapter	Datapoints	Reference document	Chapter in reference document
GOV-1 The role of the administrative, management, and supervisory bodies	ESRS 2-GOV-1 21c ESRS 2-GOV-1 23 ESRS 2-GOV-1 21a GOV-1 G1 5a GOV-1 G1 5b	Consolidated Corporate Governance Report 2024/25	Composition of the Management Board/ Composition of the Supervisory Board
GOV-3 Integration of sustainability-related performance in incentive schemes	ESRS 2-GOV-3 29 ESRS 2-GOV-3 29a ESRS 2-GOV-3 29b ESRS 2-GOV-3 29c ESRS 2-GOV-3 29d ESRS 2-GOV-3 29e GOV-3 E1 13	Remuneration Report for members of the Management and Supervisory Board BY 2024/25	Remuneration of the Management Board Remuneration of the Supervisory Board

GOVERNANCE

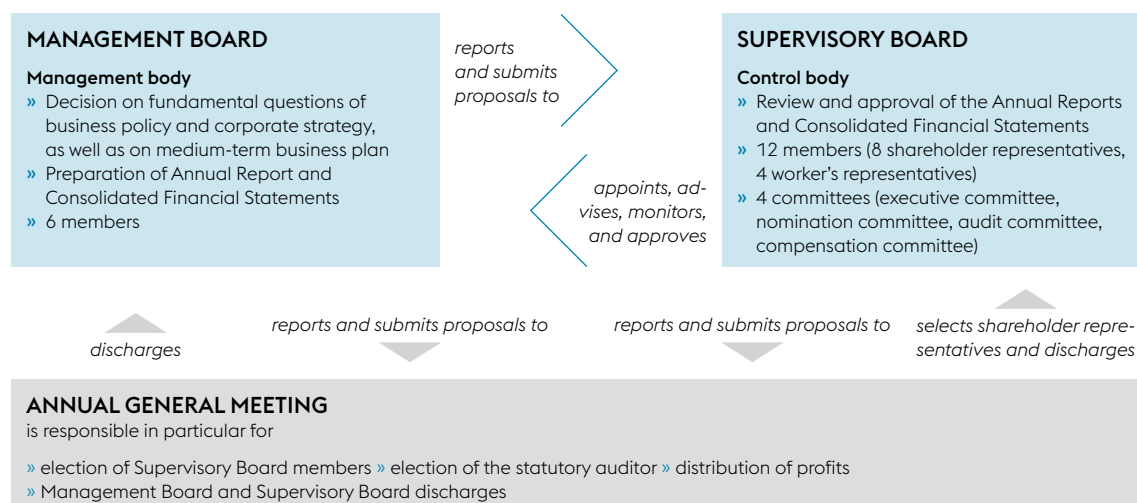
GOV-1 – The role of the administrative, management, and supervisory bodies

GOV-1 – GENERAL INFORMATION

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

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

DUAL voestalpine MANAGEMENT SYSTEM

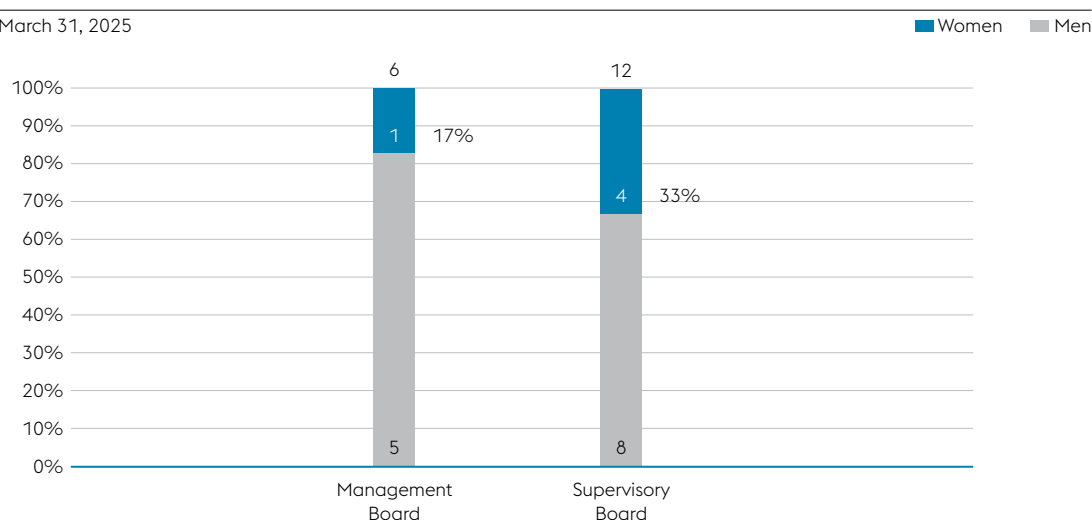


The Management Board of voestalpine AG currently consists of six members, including one woman, resulting in the board's proportion of women coming to approximately 17%. Five board members have Austrian citizenship, while one member is a German citizen.

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

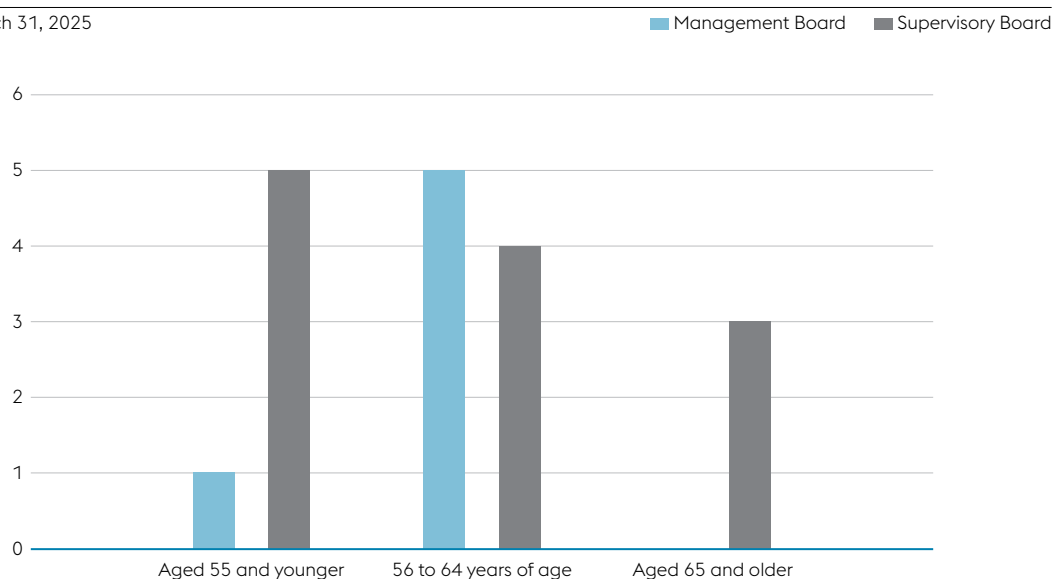
GENDER STRUCTURE OF THE MANAGEMENT BOARD AND SUPERVISORY BOARD

as of March 31, 2025



AGE STRUCTURE OF THE MANAGEMENT BOARD AND SUPERVISORY BOARD

as of March 31, 2025



For informational purposes, it is noted that, effective May 1, 2025, the Group Works Council of voestalpine AG has nominated Manfred Hippold as the employee representative on the Supervisory Board of voestalpine AG, replacing Hans-Karl Schaller. The age and gender structure remains unchanged.

Additional information on the composition of the Management Board can be found in the most recent Consolidated Corporate Governance Report 2024/25 (chapter “Composition of the Management Board”). There, the members of the Management Board are listed by name, along with details on their professional background, highlighting their expertise and experience in relation to sustainability matters. Additionally, relevant knowledge regarding the company sectors, products, and geographic locations of voestalpine is presented. The report also contains information on the terms of office and areas of responsibility of the individual members of the Management Board.

Additional information regarding the composition of the Supervisory Board, its committees, as well as the number and key topics of meetings in the 2024/25 business year can also be found in the most recent Consolidated Corporate Governance Report 2024/25 (chapter “Composition of the Supervisory Board”). The Supervisory Board possesses a wide range of expertise, professional experience, and management skills, ensuring effective oversight and guidance of the Management Board. This expertise is particularly important in the context of the Corporate Sustainability Reporting Directive (CSRD). An overview of the specific skills and expertise of the Supervisory Board members can be found in the qualifications matrix in the Consolidated Corporate Governance Report 2024/25, in the chapter “Composition of the Supervisory Board.”

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

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

GOV-1 – G1 BUSINESS CONDUCT

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

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

The Management Board and the Supervisory Board of voestalpine AG resolved as early as in 2003 to recognize the Austrian Code of Corporate Governance, and have implemented all amendments made up until 2023 by the end of the reporting period. The C Rules and R Rules of the Code, as of the January 2025 version, will be implemented starting from the 2025/26 business year. In the business year 2024/25, voestalpine AG complied with the Code's mandatory L Rules as well as with the C Rules (excepting C Rule 39 from which it deviated) and all R Rules.

C RULE 39

Under C Rule 39, the majority of committee members shall satisfy the independence criteria established by the Supervisory Board in accordance with C Rule 53. In addition to one employee representative, the General and the Compensation Committee comprise two members elected by the Annual General Meeting. Following his election as the Chairman of the Supervisory Board of voestalpine AG effective April 1, 2022, and pursuant to the Supervisory Board's internal rules of procedure, Dr. Wolfgang Eder also assumed the chairmanship of both the General Committee (which simultaneously serves as the Nomination Committee) and the chairmanship of the Compensation Committee.

Owing to his prior position as the Chairman of voestalpine AG's Management Board until July 3, 2019, Dr. Eder does not fulfill one of the Supervisory Board's criteria of independence pursuant to Rule 53. Given this composition, therefore, the two Committees deviate from Rule C 39 of the Code because they do not include a majority of members elected by the Annual General Meeting who are independent as required under the independence criteria stipulated by the Supervisory Board.

By electing Dr. Eder to the position of Chairman of the Supervisory Board and thus also to the chairmanship of both the General and the Compensation Committees, in the company's interest the Supervisory Board is relying on his ability to fulfill these core responsibilities thanks to his many years of experience in the industry and management as well as his insight into the Group. As of August 2024, Dr. Eder will satisfy all of the independence criteria established by the Supervisory Board, with the result that full compliance with C Rule 39 will once again be assured from that date onward.

As of August 2024, all members of the Supervisory Board elected by the Annual General Meeting, and therefore all of the shareholder representatives, are to be classified as independent within the meaning of the criteria laid down by the Supervisory Board in accordance with C Rule 53 of the Austrian Code of Corporate Governance.

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

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

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

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

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

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

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

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

In the business year 2024/25, the Supervisory Board and Management Board of voestalpine addressed all significant IROs in accordance with SBM-3.

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

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

The key principles of the compensation policy, along with detailed information on the compensation of the members of the Management Board and Supervisory Board, are presented in the compensation report for the Management and Supervisory Boards for the business year 2024/25. The report was audited by Deloitte Audit Wirtschaftsprüfungs GmbH and will be submitted for approval to the 33rd Annual General Meeting of voestalpine AG on July 2, 2025.

Since both the compensation policy and the compensation report will be submitted to the Annual General Meeting for approval, feedback from stakeholders will also be taken into account. The voting results for the compensation report and the compensation policy from the 32nd Annual General Meeting of the company held on July 3, 2024, are published on the voestalpine AG website. The compensation system for the Management Board aims to ensure appropriate compensation in relation to the size and financial position of voestalpine AG and to create incentives for long-term successful corporate management. The compensation of the Management Board members consists of a fixed, non-performance-based salary and a variable, performance-based component. The latter is based on a performance agreement concluded at the beginning of the business year between the Management Board and the general committee of the Supervisory Board of the company. The agreement includes both financial targets in the form of quantitative metrics and non-financial qualitative targets. Care is taken when determining these performance criteria to promote the long-term development of the company and avoid creating incentives for short-term effects only. During the reporting period, non-financial targets included sustainability matters that are not based on performance metrics but are instead of a qualitative nature.

Sustainable action is achieved by setting quantitative targets for a three-year period.

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

GOV-3 – E1 CLIMATE CHANGE

Climate-related considerations form part of the variable compensation of voestalpine's Management Board. Details regarding the proportion of compensation-relevant climate-related criteria and their formulation are included in the compensation report for voestalpine AG's Management and Supervisory Board members for the business year 2024/25, in the chapter "Remuneration of the Management Board."

GOV-4 – Statement on due diligence

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

The due diligence governance processes comprise several successive steps:

1. Identifying and assessing material adverse impacts

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

2. Integrating impacts into the corporate strategy and operational processes

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

3. Implementing preventive and remedial actions

- » Development and implementation of specific actions to prevent, mitigate, or remedy negative impacts.
- » Carrying out targeted training programs for employees on human rights and environmental due diligence responsibilities.
- » Periodic supplier assessments, in particular with regard to labor and environmental standards.
- » Promotion of sustainable procurement practices and initiatives to reduce CO₂ 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
a) Embedding due diligence in governance, strategy, and business model	<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) Engaging with affected stakeholders in all key steps of the due diligence	<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&D, Taxes): stakeholder engagement</p>
c) Identifying and assessing adverse impacts	<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>
d) Taking actions to address those adverse impacts	<p>ESRS 2 MDR-A Actions</p> <p>In each topical chapter (E1, E2, E3, E4, E5, S1, S2, S3, G1, R&D, Taxes): actions, including transition plans to address impacts</p>
e) Tracking the effectiveness of these efforts and communicating	<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&E, Taxes): metrics and targets</p>

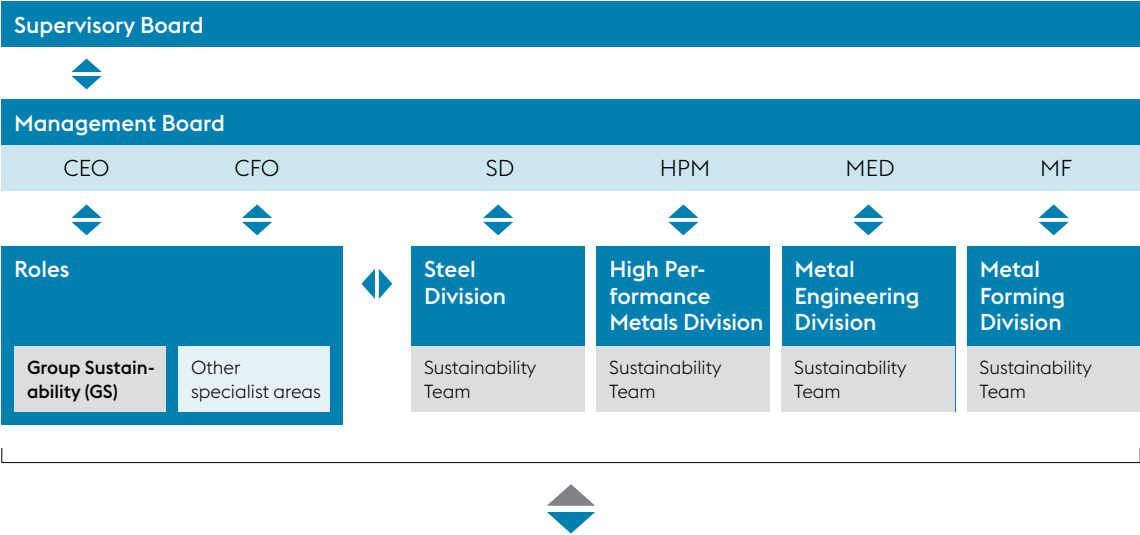
GOV-5 – Risk management and internal controls over sustainability reporting

ORGANIZATIONAL ANCHORING OF SUSTAINABILITY AT voestalpine

The Group Sustainability department, which was newly created at Group level in 2023, is responsible for all sustainability agendas at voestalpine. It acts as a central coordination point for corporate responsibility management and all sustainability initiatives. In addition, a secondary organization was established in the reporting period in the form of a board and committee structure in order to ensure consistent cross-functional and cross-divisional cooperation at all levels. This structure also includes risk management processes and internal control mechanisms related to sustainability reporting.

ORGANIZATIONAL STRUCTURE—SUSTAINABILITY MANAGEMENT

PRIMARY ORGANIZATION



SECONDARY ORGANIZATION



Group Sustainability department

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

Internal Audit and Risk Management department

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

Specialist departments

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

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

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

An integral part of the risk analysis and assessment is the comprehensive materiality assessment conducted in accordance with ESRS, which ensures that all sustainability topics relevant to voestalpine are identified and considered in the sustainability report. In the business year 2023/24, the perspective of stakeholders was increasingly incorporated into this analysis. An audit ensures that the identified topics are covered in the sustainability report.

Sustainability reporting is subject to risks, such as human error, incomplete data, or inconsistent information. Risks relate in particular to the accuracy of data entries and manual processing steps in the reporting process.

Furthermore, the materiality assessment conducted as part of the initial application of ESRS posed a particular challenge: In certain areas, such as biodiversity, there was limited reliable information available at the time of the assessment to accurately assess concrete impacts as well as financial risks and opportunities. voestalpine is working to systematically improve its expertise and the underlying data foundation in these areas.

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

- » The CSRD project core team regularly reviews the requirements for sustainability reporting and the regulations during the reporting process.
- » Internal experts from a wide range of specialist departments as well as external experts examine the topic-specific chapters, carry out cross-comparisons with other chapters (dual control principle), and review or validate subject-specific content.
- » The Group Sustainability Committee reviews and subsequently approves the material intended for publication.
- » In addition, the sustainability report is subject to an external audit with limited assurance.
- » In areas where data is incomplete—such as biodiversity—voestalpine systematically documents any information gaps. These then serve as the basis for the further development of the materiality assessment and reporting in future reporting periods.

The appointed auditors conduct analytical audit procedures and conduct sample audits as part of the limited assurance process for the company's sustainability report. Audit activities performed by the external auditor are described in the assurance statement.

Furthermore, voestalpine has implemented additional internal controls based on its risk assessment in the sustainability report. These include quantitative and qualitative audit mechanisms, the involvement of key corporate functions, and the participation of the Group-wide Sustainability Board. These controls are complemented by system-based access controls and automated input controls in the IT systems used for sustainability reporting.

STRATEGY

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

voestalpine is a global steel and technology group with a unique combination of material and processing expertise. The Group's organizational structure consists of a holding company and four divisions. With high-quality product and system solutions made from steel and other metallic materials, voestalpine is a leading partner in the automotive, energy, mechanical engineering, consumer goods, and aerospace industries. In addition, voestalpine is the world market leader in rail infrastructure systems, tool steel, and special sections. The Group's broad customer base contributes to earnings stability in a cyclical market environment overall.

The Group Strategy 2030+ outlines the path for voestalpine in the coming years, aiming to ensure the company's future viability and enable further value-enhancing growth. As an international Group, voestalpine is committed to global climate targets and is working intensively on technologies to reduce CO₂ emissions as well as on long-term decarbonization.

The Steel Division has been setting environmental benchmarks in steel production for years and is developing hydrogen-based future technologies to achieve CO₂-neutral steel production. With its high-quality strip steel, the Steel Division is a partner to renowned automotive manufacturers and suppliers around the globe.

The High Performance Metals Division is a global leader in the production and downstream processing of metallic high-performance materials, particularly high-speed steel and other specialty steels, as well as titanium and nickel-based alloys. Customers of these products include, for example, suppliers to the automotive and consumer goods industries, the special machinery sector, as well as the aerospace industry. With the sale of Buderus Edelstahl, voestalpine's High Performance Metals Division is concentrating its product portfolio on the technologically advanced high-performance materials segment and reducing its production share in tool steel and premium construction steel in the standardized performance sector, which is increasingly under price pressure due to rising competition from non-European competitors.

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

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

voestalpine does not offer products or services that are subject to bans in the respective markets.

REVENUE BY REGION

2024/25	Total	in %
European Union (excluding Austria)	8,969.3	57%
Austria	1,083.2	7%
USMCA	2,192.1	14%
Asia	1,430.5	9%
South America	528.0	3%
Rest of World	1,540.6	10%
Total revenue by region	15,743.7	100%

In millions of euros

REVENUE BY DIVISION

2024/25	Total	in %
Steel Division	5,799.1	37%
High Performance Metals Division	3,182.2	20%
Metal Engineering Division	4,167.9	27%
Metal Forming Division	3,125.1	20%
Holding & Group Services	1,012.4	6%
Consolidation	-1,543.0	-10%
Total Group	15,743.7	100%

In millions of euros

REVENUE BY INDUSTRY

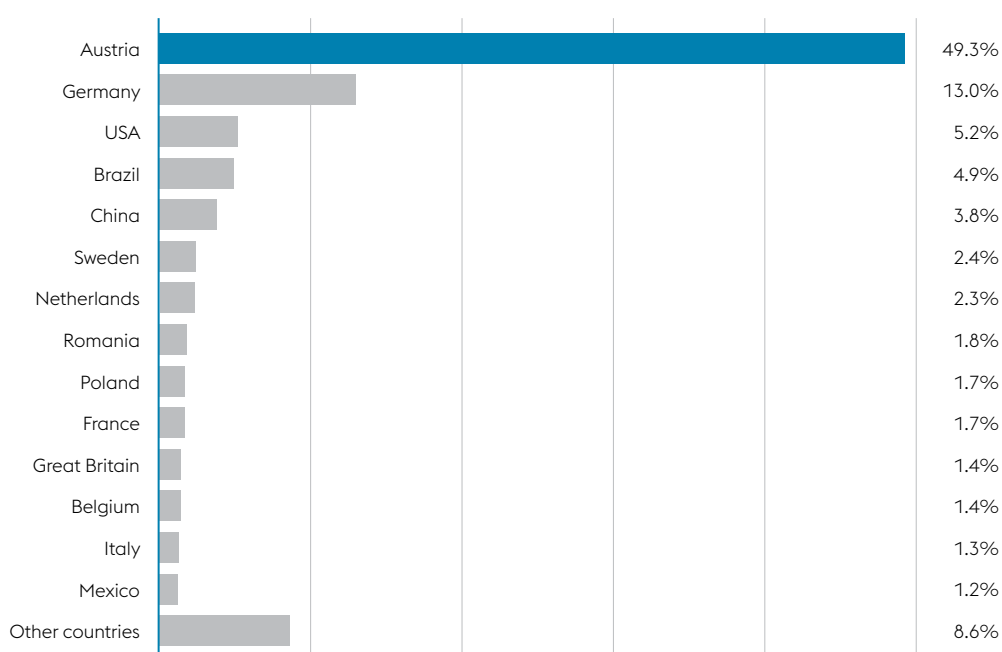
2024/25	Total	in %
Automotive	4,772.2	30%
Energy	2,711.7	17%
Railway systems	2,266.2	15%
Construction	1,503.6	10%
Mechanical engineering	1,280.7	8%
White goods/Consumer goods	651.2	4%
Aerospace	543.4	3%
Other	2,014.7	13%
Total revenue by industry	15,743.7	100%

In millions of euros

voestalpine comprises about 500 Group companies and sites in over 50 countries on five continents. As of the annual reporting date (March 31, 2025), the voestalpine Group had a global workforce of 49,298 employees (including apprentices). 49.3% of the employees are based in Austria, while 50.7% work at sites outside Austria.

EMPLOYEES BY COUNTRY (PERCENTAGE)

Headcount, as of the March 31, 2025 reporting date



EMPLOYEES BY COUNTRY (HEADCOUNT ABOVE 10)

Headcount (incl. apprentices), as of the March 31, 2025 reporting date

Country	Overall
Austria	24,323
Germany	6,406
USA	2,575
Brazil	2,436
China	1,879
Sweden	1,205
Netherlands	1,137
Romania	875
Poland	845
France	814
Great Britain	706
Belgium	675
Italy	663
Mexico	605
India	480
South Africa	429
Czech Republic	343
Spain	316
Australia	293
Türkiye	282
Hungary	275
Canada	208
Indonesia	153
Singapore	147
Switzerland	132
Thailand	113
Bulgaria	111
Taiwan	99
Peru	88
Lithuania	80
Japan	73
Colombia	69
Argentina	66
Saudi Arabia	59
Malaysia	56
Vietnam	54
Republic of Korea (South Korea)	47
Portugal	39
Ecuador	35
Slovakia	27
United Arab Emirates	23
Egypt	16
Denmark	12

SUSTAINABILITY STRATEGY AND TARGETS

The sustainability strategy of voestalpine forms an integral part of the Group's corporate strategy and is operationalized within the individual divisional, business unit, and functional strategies. With its comprehensive sustainability strategy, voestalpine pursues an integrated approach and has formulated strategic principles and targets for each sphere of action. The sustainability strategy is holistic and is based on the three pillars of the economy, environment, and society. It is implemented both in operational processes and in the organization of voestalpine, covering all of the Group's business activities.

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

SUSTAINABILITY STRATEGY—STRATEGIC SPHERES OF ACTION



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

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

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

In the first phase, EUR 1.5 billion is already being invested in one green-powered electric arc furnace each in Linz and Donawitz to replace one blast furnace at each location. The materials used involve a mix of scrap, liquid pig iron, and hot briquetted iron (HBI), with the mix adjusted according to the specific quality requirements. These electric arc furnaces, which are already under construction, will go into operation in 2027 and significantly reduce Scope-1- and Scope-2-CO₂ emissions by a total of 30% by 2029 by increasing the use of electricity instead of coal and coke. This represents almost 5% of Austria's entire annual CO₂ emissions, making greentec steel the country's largest climate protection program.

Starting in 2030, the second phase of the greentec steel climate protection program will be launched, in which one further blast furnace in both the Steel Division and the Metal Engineering Division will be replaced by an electric arc furnace. These actions, together with the expected complementary use of carbon capture and utilization/storage (CCUS) technologies, will reduce Scope-1- and Scope-2-CO₂ emissions by a total of 50% by 2035 compared to 2019.

With regard to further decarbonization after 2035 (phase 3), the focus will be on replacing the remaining fossil pig iron capacity with fossil-free energy sources such as green hydrogen and bioenergy, and on the capture, storage, and utilization of CO₂ (CCUS). The final decisions on phase 2 and phase 3 will be taken in line with the investment cycles and in consideration of the prevailing technological and regulatory environment at the time. Consisting of several modular technology steps and options as well as staggered decision times for the decarbonization steps, the greentec steel phased plan permits maximum flexibility without jeopardizing the cost-effectiveness of the net-zero policy. The respective phases can be adapted to changing economic and political conditions as well as to future technological possibilities without influencing the strategic objectives.

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

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

In addition, the health of employees and the ongoing assurance and enhancement of occupational safety are core values at voestalpine and are given top priority. Continuous efforts are therefore being made to further reduce the frequency of accidents and increase the health index in order to move closer to the vision of “zero accidents.” Strategically, the accident frequency rate is to be reduced by a further 30% by 2030. Group-wide safety standards form the basis of a successful corporate culture rooted in health and safety.

Moreover, voestalpine addresses sustainability in its supply chain and works to counter the material negative impact identified (for more information, see below and chapter S2 Value chain workers).

VALUE CHAIN AND BUSINESS MODEL

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

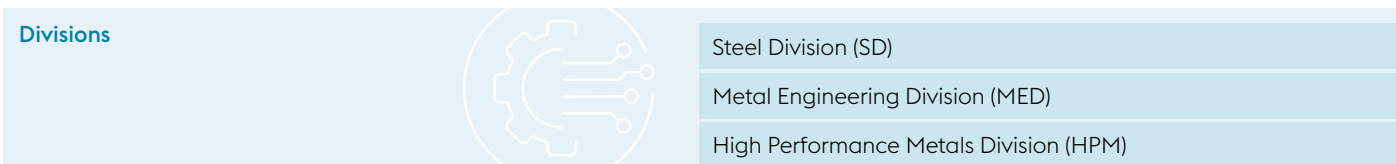
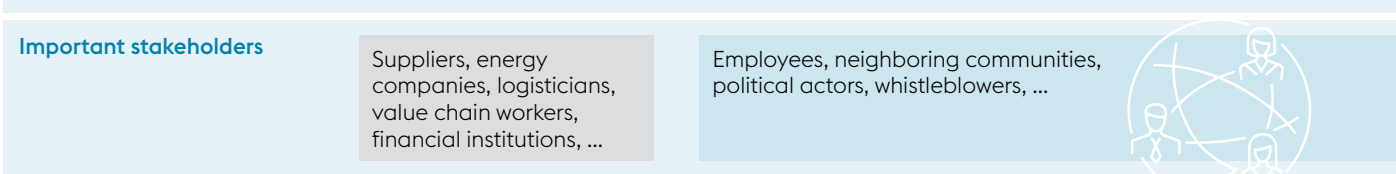
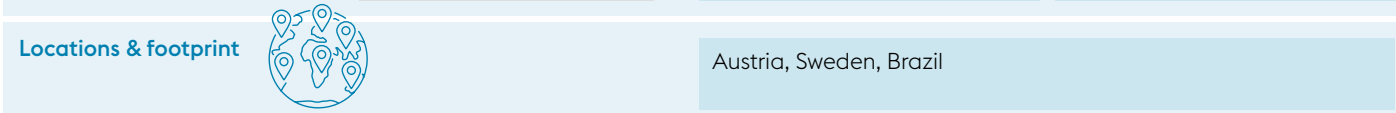
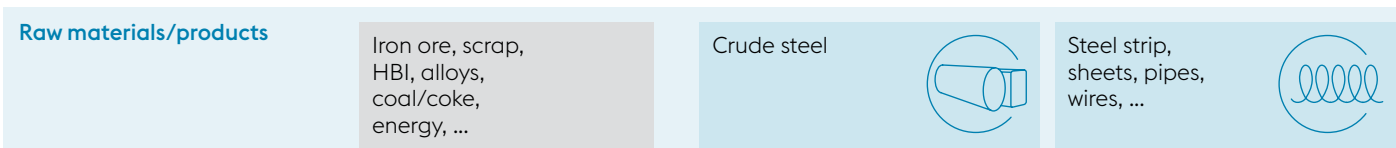
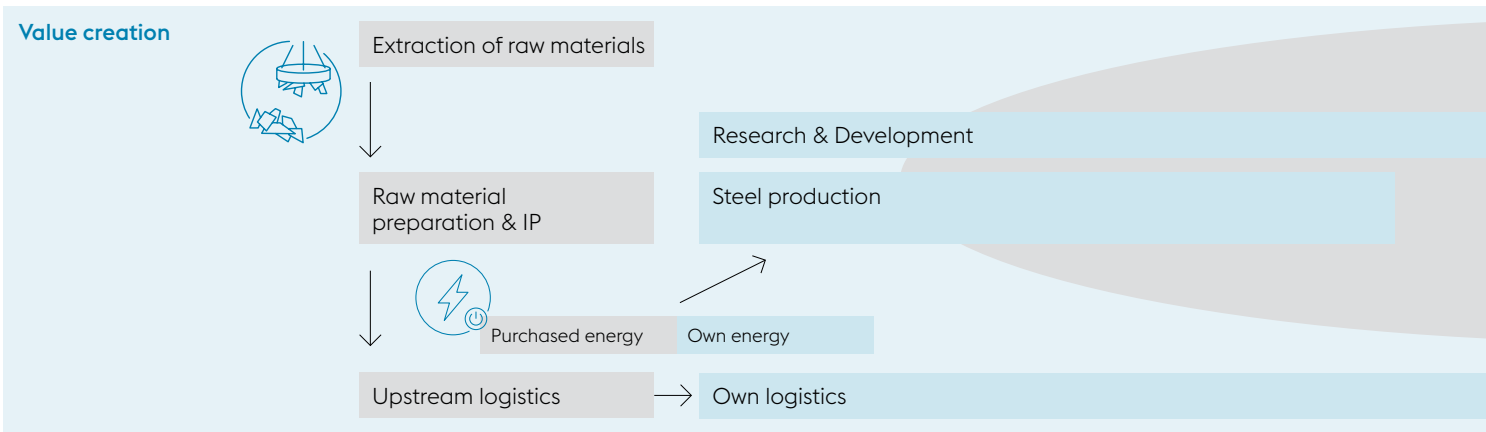
voestalpine VALUE CHAIN

From ore



UPSTREAM

OWN ACTIVITIES





To use



DOWNSTREAM

← RECYCLING →



Treatment and processing of steel and other high-performance metallic materials



Use



Further processing

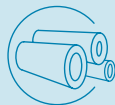


Downstream logistics

Alloys,
special materials,
precision strip, ...



Pipes, profiles,
machined
steel, ...



Rail infrastructure,
welding solutions,
car components,
warehouse technology, ...



Cars, railway systems,
machinery, construction,
energy, aerospace,
consumer goods, ...

Locations worldwide

Customers,
logisticians,
...



Metal Forming Division (MFD)



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

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

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

The voestalpine Group manufactures a wide range of steel and other high-performance metal products, the majority of which are processed into final products in various industries. These include various flat and long products, but also further-processed products and ready-to-install components, e.g., for tool making, the automotive and energy industry, aerospace, construction and mechanical engineering, the consumer goods and food industry, as well as system solutions, for example for railway infrastructure or storage technology.

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

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

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

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

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

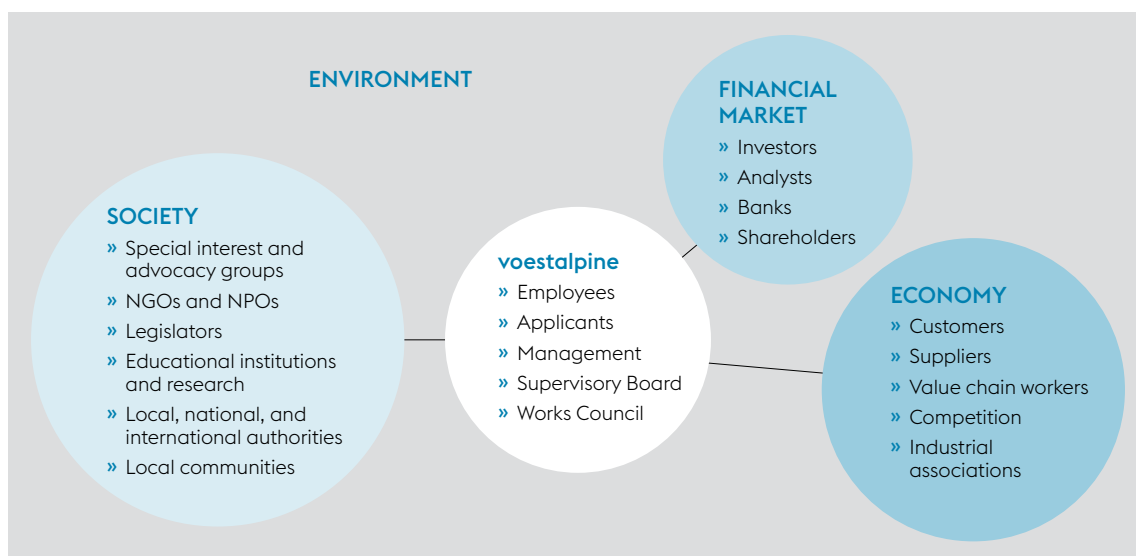
Additionally, voestalpine attaches great importance to transparency in the value chain. Environmental impacts and adverse social impacts, such as labor and human rights violations, need to be minimized to the greatest possible extent. In cooperation with suppliers, attention is paid to compliance with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

SBM-2 – Interests and views of stakeholders

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

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

STAKEHOLDER CATEGORIZATION



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

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

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

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

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

The following section outlines how communication with key stakeholders is structured. The examples given include the main stakeholder groups as well as the platforms most commonly used by voestalpine for dialogue and reconciling interests with them. voestalpine's executives also engage with other groups at different locations in various ways.

EMPLOYEES

The voestalpine Group currently has a global workforce of about 50,000 employees. Both the annual employee performance review and the regular Group-wide employee survey are key tools for engaging in structured communications. Employees' feedback is analyzed by management and flows into any action plans the company develops—for example, with respect to personnel development.

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

CUSTOMERS AND SUPPLIERS

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

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

ANALYSTS AND INVESTORS

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

RESEARCH INSTITUTES AND UNIVERSITIES

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

NGOs, SPECIAL INTEREST GROUPS, AND PLATFORMS

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

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

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

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

SBM-2 – S1 OWN WORKFORCE

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

SBM-2 – S2 WORKERS IN THE VALUE CHAIN

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

SBM-2 – S3 AFFECTED COMMUNITIES

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

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

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

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

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

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

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

ESRS	Topic/sub-topic/sub-sub-topic	Impact, risk, opportunity (IRO)
E1	Climate change mitigation	● Scope 1 GHG emissions
		● Scope 2 GHG emissions
		● Scope 3 GHG emissions
		○ Transformation of facilities and technologies
		○ New job infrastructure in the vicinity of voestalpine production sites
		! Transition risk: risks arising from the technical transition of production processes to zero-emission technologies
		! Transition risk: higher costs for CO ₂ allowances in the ETS for voestalpine
		! Transition risk: decrease in sales volume and margin due to structural change in European industry and competitive disadvantages due to unilateral European regulations
		+ Transition opportunity: increased sales volumes of sustainable/low-emission steel products for voestalpine (especially in sectors relevant to the energy transition) leading to a sustainable stabilization of sales and EBIT
		! Transition risk: supply bottlenecks and higher costs for important materials and raw materials
	Climate change adaptation	! Chronic physical climate risks
		! Acute physical climate risks
	Energy	● Direct energy consumption
		! Transition risk: bottlenecks in the energy supply at major production sites (in particular Linz and Donawitz) and higher costs for energy procurement (renewable and non-renewable sources) due to the energy transition in Europe
E2	Air pollution	● NO _x , SO _x , and dust emissions from our own value-added processes
E3	Water withdrawal	● Water withdrawal
E4	Biodiversity and ecosystems	● Biodiversity in the upstream value chain
E5	Circular economy	● Metal recycling—using scrap as a resource
		● Business models for recycling
		● Waste recovery—use of by-products within voestalpine or selling them to other industries
		● Production innovations
		+ USP based on product differences
I, R&D	Innovation, research & development	+ Increased recycling efficiency through technological innovation
		+ Breakthrough technology applications (e.g., HYFOR)
		! Ensuring product quality with increased use of scrap
S1	Working conditions	● Respect for human rights and fair working conditions at voestalpine
	Secure employment	○ Economic crisis or restructuring
	Health and safety	● Healthy and safe working conditions at voestalpine
		● Accidents at work, injuries, and occupational illnesses (health and safety)
	Equal treatment and opportunities for all	● Equal opportunities for all employees
	Training and skills development	● Personal development and training
S2	Worker rights and conditions in the value chain	! Financial claims and loss of reputation relating to potential labor exploitation in the supply chain (direct payments, in particular due to CSDDD; indirect losses due to poorer sustainability ratings)
S3	Affected Communities	● Engagement with affected communities (own Group—Linz, Donawitz, Kapfenberg)
G1	Corporate culture	● Shared values at voestalpine
	Ethical business conduct	● Practiced corporate ethics
		! Violation of compliance guidelines and white-collar crime
Tax	Taxes	● Correct tax payments

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

The impairment losses of EUR 38.8 million in the business year 2024/25 and the restructuring expenses of EUR 47.7 million recognized in the business year 2024/25 at Automotive Components result from the initiated consolidation strategy, in particular due to the ongoing capacity underutilization among premium customers of the German automotive industry, which is partly due to the structural change in Europe and the associated transitory climate risk: "Decline in sales volume and margin due to structural change in European industry and competitive disadvantages as a result of unilateral EU regulation." In this regard, there may be an adjustment in the carrying amount of the assets and provisions reported in the IFRS Consolidated Financial Statements in the next reporting period (see D.11 Impairments and reversals of impairment losses in the IFRS Consolidated Financial Statements for more details).

The resilience of voestalpine's strategy and business model is regularly analyzed and assessed as part of the strategy review process. For climate change information, see SBM-3 E1 Climate change. The company is tackling the risk of "ensuring product quality with increased use of scrap metal" with a wide range of actions. At the heart of these actions is the increased focus on research in order to continue to be able to manufacture the highest quality steel products after transitioning from blast furnace to electric arc furnace production (see I,R&D chapter). There are sufficient policies and procedures in place to address the risk of labor exploitation in the supply chain and the risk of non-compliance and white-collar crime. For further information, refer to chapters S2-1 Policies related to value chain workers and S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns, as well as chapters G1-1 Corporate culture and business conduct policies and G1-3 Prevention and detection of corruption and bribery.

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

SBM-3 – E1 CLIMATE CHANGE

The company has identified seven material climate-related risks, comprising two climate-related physical risks and five climate-related transition risks:

Climate-related risks		Risk
Climate-related physical risk	!	Chronic physical climate risks
	!	Acute physical climate risks
Climate-related transition risk	!	Transition risk: risks arising from the technical transition of production processes to zero-emission technologies
	!	Transition risk: higher expenditure for carbon credits as part of the ETS for voestalpine
	!	Transition risk: decline in sales volumes and margins due to structural change in European industry and competitive disadvantages due to unilateral European legislation
	!	Transition risk: supply bottlenecks or higher costs for important raw and other materials
	!	Transition risk: bottlenecks in the energy supply at the major production sites (in particular Linz and Donawitz) and higher costs for energy procurement (renewable and non-renewable sources) as a result of the energy transition in Europe

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

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

Physical risks

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

Transition risks

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

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

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

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

SBM-3 – E4 BIODIVERSITY AND ECOSYSTEMS

The materiality assessment did not identify any material impacts of voestalpine's activities on biodiversity and ecosystems or dependencies of the company's activities on the respective ecosystem services at its own sites. A list of all sites located in the vicinity to protected areas can be found in ESRS 2 IRO-1 E4. No activities with material impacts on biodiversity and ecosystems have been identified at these sites either. In addition, no negative impacts of voestalpine activities on affected species or in terms of land degradation, desertification, or soil sealing have been identified.

SBM-3 – SOCIAL ISSUES

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

SBM-3 – S1 OWN WORKFORCE

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

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

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

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

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

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

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

The decommissioning of two coal-based blast furnace units and the commissioning of one green-powered electric arc furnace each in Linz and Donawitz from 2027 will result in material impacts on the workforce at these associated production workplaces. In order to counteract negative impacts on these workers, such as the threat of job losses, measures such as retraining and upskilling programs for green and future-proof technologies are being promoted. This aims to ensure that they remain employable.

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

SBM-3 – S2 Workers in the value chain

The materiality assessment identified a material risk with regard to potential financial claims due to labor exploitation in the supply chain. This risk results from the global distribution of the workforce and the unintended occurrence of labor or human rights violations. Possible financial burdens include sanctions—in particular in relation to the Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz, LkSG*) and the Corporate Sustainability Due Diligence Directive (CSDDD)—as well as indirect economic disadvantages, such as a deterioration of sustainability ratings by relevant stakeholders.

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

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

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

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

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

SBM-3 – S3 Affected communities

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

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

- » Direct neighbors of production and processing sites
- » Political and (statutory/voluntary) advocacy groups
- » Authorities and public organizations/bodies
- » Science
- » Civil society (non-governmental organizations, citizens' initiatives)
- » General public, media

voestalpine maintains a continuous dialogue with the communities affected by its sites. Platforms for dialogues include event-related information and consultation events for local residents, regular coordination with authorities, and a publicly accessible whistleblower system. These measures promote social cohesion and community well-being, and allow voestalpine to better understand the social, cultural, and environmental issues faced by affected communities. As an employer, voestalpine also contributes to economic stability in many of the regions in which it is located. In order to present its contribution to society with transparency, voestalpine publishes data on research and development, the environment, employment, and tax and contributions paid on its website <https://www.voestalpine.com/oesterreich/de/>.

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

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

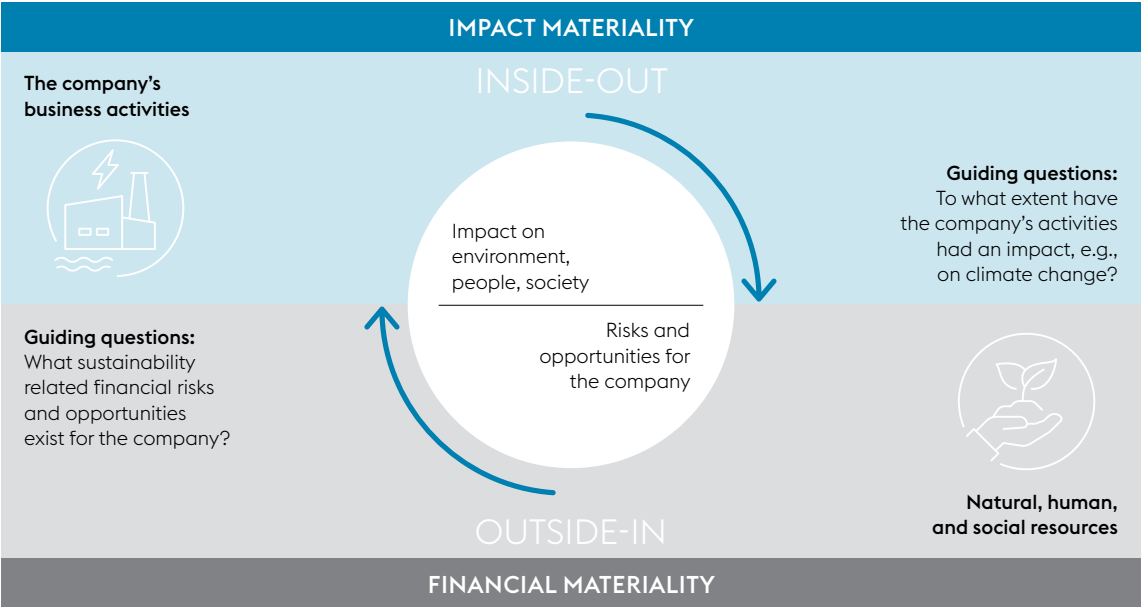
METHODOLOGICAL FRAMEWORK

In 2024, voestalpine identified its material sustainability aspects using the double materiality assessment. voestalpine's double materiality assessment was carried out in accordance with the methods and steps described in the European Sustainability Reporting Standards (ESRS). In accordance with the principle of double materiality, two perspectives are taken into account in order to systematically record the interactions between the company and its environment:

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

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

MATERIALITY ASSESSMENT



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

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



1. Materiality policy

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



2. Identification of topics (long and short list)

- » **Preparation of a long list of material topics** (approx. 260 topics) taking into account the ESRS
- » Provision of workshops for internal experts to prioritize long list topics, bundle topics, and **prepare the short list**



3. Deep-dive on material topics

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



4. Stakeholder survey

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



5. Evaluation of impacts, risks, and opportunities

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



6. Prioritization of material topics

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



7. Impacts on strategy and reporting

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

The plan is to carry out the entire materiality assessment process every five years moving forward. If there are significant changes within the Group, an early update will take place. Irrespective of this, an annual review will be conducted to determine whether the identified material IROs are still relevant or whether adjustments to the reporting requirements and datapoints are necessary in the sustainability report.

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

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

Identification of impacts, risks, and opportunities

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

To identify impacts, risks, and opportunities (IROs), voestalpine used, among other things, the list of sustainability aspects defined in ESRs. All aspects were systematically reviewed to determine whether they are linked to IROs in voestalpine's own value chain or in the upstream and downstream value chains. Consideration was given to whether risks and opportunities arise from the company's impacts or dependencies. No priorities were set at this stage.

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

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

Stakeholder engagement

The stakeholders involved were selected by the project core team. Prior to this, a discussion was held with voestalpine stakeholder management experts. Based on this, the stakeholders who could potentially be involved were assessed in a workshop in terms of their importance and accessibility. Importance was measured by the level of interest of a stakeholder group in the sustainable development of voestalpine, and the extent of its influence on the company. The importance rating was crucial in determining whether a stakeholder group should be involved, and the accessibility rating determined how this should be achieved.

In order to define the interaction methodology for each stakeholder group, the groups were categorized according to their accessibility. Stakeholder engagement was conducted in two different ways: Through face-to-face interviews and a large-scale anonymous online survey. Both methods have their advantages, which were united by means of their combined application. The online survey reached many people and thus achieved a high level of representation and statistical validity for the evaluation. Various aspects were discussed in detail in interviews with individual stakeholders and their representatives, with a deeper understanding gained of their perspectives and concerns.

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

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

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

Assessment of IROs

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

Assessment approach for positive and negative impacts:

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

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

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

Assessment approach for risks and opportunities:

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

Determination of reporting requirements based on material IROs

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

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

Embedding the materiality assessment in governance and Group processes

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

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

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

IRO-1 – E1 CLIMATE CHANGE

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

Identification of material climate impacts

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

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

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

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

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

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

The climate scenarios used in the analyses are consistent with the critical climate-related assumptions in the financial statements (see also B.2. Discretionary decisions and estimation uncertainties for further details).

Physical climate risk analysis

For the physical scenario analysis, which was carried out as part of the EU Taxonomy, various climate scenarios from a simulation-based solution were used. The analysis covered key locations with an asset value of over EUR 10 million, as well as strategic hubs within own operations. This corresponds to coverage of approximately 90% of revenue and 114 locations. The upstream and downstream value chains were not included in the analysis. However, due to the high diversification of suppliers and customer segments, no significant physical climate risks are expected in these areas.

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

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

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

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

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

» **Plan:**

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

» **Do:**

Implement necessary actions in accordance with the implementation plan

» **Check:**

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

» **Act:**

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

Transition climate risk analysis

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

The transition climate risk analysis is based on the NGFS scenarios (Network for Greening the Financial System; scenarios; net-zero 2050 (1.5 °C), Below 2 °C, and Delayed Transition), which are recognized as suitable data sources in ESRs. voestalpine chose these climate scenarios because they explicitly consider variables for the raw materials industry, including steel, and thus reflect voestalpine's business model. Within the NGFS dataset, the REMIND-MAGPIE model was used, which is characterized by comprehensive integration of various datasets and detailed regional differentiation.

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

Key transition events that are important for the steel industry were systematically examined. These include the development of the CO₂ price, regulatory requirements, the volatility of the energy markets, changing market and customer expectations, and changes in the capital market. The impacts of these factors have been analyzed in detail, documented, and assessed in terms of their relevance to voestalpine's business model.

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

The materials risks and opportunities are presented and explained in chapter SBM-3 Material impacts, risks, and opportunities and their interaction with strategy and business model.

IRO-1 – E2 POLLUTION

As part of the materiality assessment, plants and sites were reviewed with regard to material air, water, and soil emissions. The focus was particularly on plants that fall under the Industrial Emissions Directive (IED) and those that are subject to reporting requirements under the European Pollutant Release and Transfer Register (E-PRTR). voestalpine has also implemented environmental management systems at production sites that either have a material environmental impact from a Group perspective or make a significant contribution to improving the Group's overall environmental performance. These systems are described in detail under E2-1. The findings from these environmental management systems were incorporated into the assessment of significant sites and business activities.

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

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

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

Site	Business activity	Country
voestalpine Stahl GmbH	Production site	Austria
voestalpine BÖHLER Edelstahl GmbH & Co KG	Production site	Austria
Buderus Edelstahl GmbH	Production site	Germany
Villares Metals S.A.	Production site	Brazil
Uddeholms AB	Production site	Sweden
voestalpine Stahl Donawitz GmbH	Production site	Austria
voestalpine Railway Systems JEZ, S.L.	Production site	Spain
voestalpine Railway Systems MFA SASU	Production site	France
voestalpine Böhler Welding Belgium	Production site	Belgium
voestalpine Giesserei Traisen GmbH & Co KG	Production site	Austria
voestalpine Grobblech GmbH	Production site	Austria
voestalpine BÖHLER Bleche GmbH & Co KG	Production site	Austria
voestalpine Rail Technology GmbH	Production site	Austria
voestalpine Wire Rod Austria GmbH	Production site	Austria
voestalpine Wire Italy s.r.l.	Production site	Italy
voestalpine Automotive Components Bunschoten B.V.	Production site	Netherlands
voestalpine Sadef nv	Production site	Belgium
voestalpine Rotec Coating SRL	Production site	Romania
TORRI S.R.L.	Production site	Italy

IRO-1 – E3 WATER AND MARINE RESOURCES

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

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

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

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

IRO-1 – E4 BIODIVERSITY AND ECOSYSTEMS

Impacts on biodiversity and ecosystems along the value chain were assessed based on the materiality assessment described in IRO-1. One potentially negative impact on ecosystems was identified in the upstream value chain, which could occur in particular in the production of key raw materials such as iron ore and coal. In addition, dependencies on biodiversity, ecosystems, and ecosystem services were analyzed. The dependency analysis was conducted and evaluated by a panel of internal experts in a series of workshops. The analysis revealed that there are no business processes or activities at relevant sites that have a direct connection to biodiversity and ecosystem services. The aim was to identify the extent to which operational processes depend on biodiversity and ecosystems. The results show that there are currently no significant business activities at the sites examined that are directly functionally dependent on specific ecosystem services or biodiversity.

voestalpine recognizes that its greenhouse gas emissions contribute to climate change, which in turn affects biodiversity. However, as this relationship is global and does not have a direct impact on specific ecosystems or local sites, it cannot be measured directly. While biodiversity loss is a local phenomenon, emissions have a global impact—therefore, the direct impact of climate change on biodiversity loss is not considered a material issue for voestalpine.

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

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

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

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

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

IRO-1 – E5 RESOURCE USE AND CIRCULAR ECONOMY

In order to identify the impacts, risks, and opportunities associated with resource use and the circular economy along the value chain, voestalpine's resource inflows, outflows, and waste generated were systematically analyzed and evaluated as part of the materiality assessment. Findings from the environmental management systems were taken into account, as were the recyclability of the products, the material properties of the raw materials used, and the possibilities for reuse.

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

The relevant aspects of the circular economy extend across the entire value chain and include the procurement of raw materials, the return of metal-containing residues to production, and the reduction of material losses. In addition, the recycling of products at the end of their life cycle plays a central role, as voestalpine aims to keep materials in the cycle for as long as possible.

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

IRO-1 – G1 BUSINESS CONDUCT

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

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

The contents of this sustainability report were identified on the basis of the double materiality analysis. The exact procedure for the dual materiality analysis can be found in the section IRO-1 Description of the process to identify and assess material impacts, risks and opportunities. The selection of datapoints was based on the results of the materiality analysis. Based on this, the materiality and applicability of individual datapoints were also evaluated on a case-by-case basis. In addition, the material company-specific topics are disclosed through concepts, measures, and goals in accordance with the structure of the ESRS.

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

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

Disclosure Requirement and related datapoint	(1) SFDR reference ¹	
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 Table #1 of Annex 1	
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)		
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1	
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv		
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14		
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 of Annex 1 and Indicator number 5 Table #2 of Annex 1	
ESRS E1-5 Energy consumption and mix paragraphes 37	Indicator number 5 Table #1 of Annex 1	
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphes 40 to 43	Indicator number 6 Table #1 of Annex 1	
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emission paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	
ESRS E1-6 Gross GHG emission intensity paragraphs 53 to 55	Indicator number 3 Table #1 of Annex 1	

(2) pillar 3 reference ²		(3) Benchmark- Regulation reference ³	(4) EU Climate Law reference ⁴	Materiality	Page refer- ence in the annual report
		Commission Delegated Regulation (EU) 2020/1816 ⁵ , Annex II		Material	p. 102
		Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	p. 104
				Material	p. 108
Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk		Commission Delegated Regulation (EU) 2020/1816, Annex II		Immaterial	n.a.
		Commission Delegated Regulation (EU) 2020/1816, Annex II		Immaterial	n.a.
		Delegated Regulation (EU) 2020/1818 ⁷ , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Immaterial	n.a.
		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Immaterial	n.a.
			Regulation (EU) 2021/1119 Article 2(1)	Material	p. 184
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		Material	p. 185
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		Material	p. 194
				Material	p. 198
				Material	p. 198
				Material	p. 199
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)		Material	p. 201
Article 449a Regulation (EU) No 575/2013 ; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book - Climate change transition risk: alignment metrics		Delegated Regulation (EU) 2020/1818, Article 8(1)		Material	p. 203

Disclosure Requirement and related datapoint	(1) SFDR reference ¹	
ESRS E1-7 GHG removals and carbon credits paragraph 56		
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66		
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)		
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		
ESRS E1-9 Breakdown of the carrying value of ist real estate assets by energy-efficiency classes paragraph 67 (c)		
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69		
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	
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1	
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table #2 of Annex 1	
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1	
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1	
ESRS E3-4 Total water consumption in m ³ per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1	
ESRS 2 – IRO 1 - E4 paragraph 16(a) i	Indicator number 7 Table #1 of Annex 1	
ESRS 2 – IRO-1 – E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1	
ESRS 2 – IRO-1 – E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1	
ESRS E4-2 Sustainable land/agriculture practices or policies paragraph 24(b)	Indicator number 11 Table #2 of Annex 1	
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1	
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1	
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1	
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1	
ESRS 2 SBM3 – S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex 1	
ESRS 2 SBM3 – S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex 1	

(2) pillar 3 reference ²	(3) Benchmark- Regulation reference ³	(4) EU Climate Law reference ⁴	Materiality	Page refer- ence in the annual report
		Regulation (EU) 2021/1119 Article 2(1)	Immaterial	n.a.
	Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Transitional provision	n.a.
Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk			Transitional provision	n.a.
Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book-Climate change transition risk: Loans collateralized by immovable property - Energy efficiency of the collateral			Transitional provision	n.a.
	Commission Delegated Regulation (EU) 2020/1818, Annex II		Transitional provision	n.a.
			Material	p. 213
			Material	p. 216
			Material	p. 214
			Immaterial	n.a.
			Material	p. 219
			Material	p. 219
			Material	p. 130
			Material	p. 130
			Material	p. 130
			Immaterial	n.a.
			Immaterial	n.a.
			Immaterial	n.a.
			Material	p. 237
			Material	p. 237
			Material	p. 131
			Material	p. 131

Disclosure Requirement and related datapoint	(1) SFDR reference ¹	
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	
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21		
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex 1	
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex 1	
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex 1	
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	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex 1	
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex 1	
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex 1	
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex 1	
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 of Annex 1 and Indicator number 14 Table #3 of Annex 1	
ESRS 2 SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and 13 Table #3 of Annex 1	
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1	
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicators number 11 and 4 Table #3 of Annex 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	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19		
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	
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	
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	
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1	
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1	

(2) pillar 3 reference ²	(3) Benchmark- Regulation reference ³	(4) EU Climate Law reference ⁴	Materiality	Page refer- ence in the annual report
			Material	p. 262
	Commission Delegated Regulation (EU) 2020/1816 Annex II		Material	p. 262
			Material	p. 263
			Material	p. 264
			Material	p. 270
	Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	p. 287
			Transitional provision	n.a.
	Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	p. 288
			Material	p. 288
			Material	p. 289
	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Material	p. 289
			Material	p. 132
			Material	p. 300
			Material	p. 299
	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Material	p. 298
	Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	p. 298
			Material	p. 306
			Material	p. 314
	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Material	p. 315
			Material	p. 323
			Immaterial	n.a.

Disclosure Requirement and related datapoint
(1) SFDR reference¹

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
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1
ESRS G1-1 Protection of whistleblowers paragraph 10 (b)	Indicator number 6 Table #3 of Annex 1
ESRS G1-4 Fines for violation of anti- corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1

¹ Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosures Regulation) (OJ L 317, 9.12.2019, p. 1).

² Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation "CRR") (OJ L 176, 27.6.2013, p. 1).

³ Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

⁴ Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ("European Climate Law") (OJ L 243, 9.7.2021, p. 1).

(2) pillar 3 reference ²	(3) Benchmark- Regulation reference ³	(4) EU Climate Law reference ⁴	Materiality	Page refer- ence in the annual report
	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Immaterial	n.a.
			Immaterial	n.a.
			Immaterial	n.a.
			Immaterial	n.a.
	Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	p. 341
			Material	p. 341

⁵ Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are reflected in each benchmark provided and published (OJ L 406, 3.12.2020, p. 1).

⁶ Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks (OJ L 324, 19.12.2022, p.1.).

⁷ Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks (OJ L 406, 3.12.2020, p. 17).

Below is a list of disclosure requirements (including references to the relevant page numbers) that were made when preparing this sustainability report based on the findings from the materiality assessment:

DISCLOSURE AND APPLICATION REQUIREMENTS IN TOPICAL ESRS THAT ARE APPLICABLE IN CONJUNCTION WITH ESRS 2 GENERAL DISCLOSURES

		Page reference in the annual report
General Information		
ESRS 2	ESRS 2 General disclosures	p. 98
BP-1	General basis for preparation of sustainability reports	p. 98
BP-2	Disclosures in relation to specific circumstances	p. 99
GOV-1	The role of the administrative, management, and supervisory bodies	p. 101
GOV-1 G1	Business conduct	p. 104
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management, and supervisory bodies	p. 105
GOV-3	Integration of sustainability-related performance in incentive schemes	p. 106
GOV-3 E1	Climate change	p. 106
GOV-4	Statement on due diligence	p. 106
GOV-5	Risk management and internal controls over sustainability reporting	p. 109
SBM-1	Strategy, business model, and value chain	p. 111
SBM-2	Interests and views of stakeholders	p. 121
SBM-2 S1	Own workforce	p. 124
SBM-2 S2	Workers in the value chain	p. 124
SBM-2 S3	Affected communities	p. 125
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 125
SBM-3 E1	Climate change	p. 129
SBM-3 E4	Biodiversity and ecosystems	p. 130
SBM-3 S1	Own workforce	p. 131
SBM-3 S2	Workers in the value chain	p. 132
SBM-3 S3	Affected communities	p. 133
IRO-1	Description of the processes to identify and assess material impacts, risks, and opportunities	p. 133
IRO-1 E1	Climate change	p. 138
IRO-1 E2	Pollution	p. 142
IRO-1 E3	Water and marine resources	p. 143
IRO-1 E4	Biodiversity and ecosystems	p. 143
IRO-1 E5	Resource use and circular economy	p. 144
IRO-1 G1	Business conduct	p. 145
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability report	p. 145

		Page reference in the annual report
Environmental Information		
Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 / Taxonomy Regulation)		p. 163
ESRS E1	Climate change	p. 177
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 178
E1-1	Transition plan for climate change mitigation	p. 182
E1-2	Policies related to climate change mitigation and adaption	p. 186
E1-3	Actions and resources in relation to climate change policies	p. 188
E1-4	Targets related to climate change mitigation and adaption	p. 194
E1-5	Energy consumption and mix	p. 198
E1-6	Gross Scopes 1, 2, 3 and total GHG emissions	p. 200
ESRS E2	Pollution	p. 206
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 206
E2-1	Policies related to pollution	p. 206
E2-2	Actions and resources related to pollution	p. 209
E2-3	Targets related to pollution	p. 212
E2-4	Pollution of air, water, and soil	p. 212
ESRS E3	Water and marine resources	p. 214
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 214
E3-1	Policies related to water and marine resources	p. 214
E3-2	Actions and resources related to water and marine resources	p. 217
E3-3	Targets related to water and marine resources	p. 217
E3-4	Water consumption	p. 218
ESRS E4	Biodiversity and ecosystems	p. 220
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	p. 220
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	p. 220
E4-2	Policies related to biodiversity and ecosystems	p. 220
E4-3	Actions and resources related to biodiversity and ecosystems	p. 221
E4-4	Targets related to biodiversity and ecosystems	p. 223

		Page reference in the annual report
Environmental Information		
ESRS E5	Resource use and circular economy	p. 224
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 224
E5-1	Policies related to resource use and circular economy	p. 226
E5-2	Actions and resources related to resource use and circular economy	p. 230
E5-3	Targets related to resource use and circular economy	p. 232
E5-4	Resource inflows	p. 233
E5-5	Resource outflow	p. 235
Innovation, research, and development		p. 240
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 240
I,R&D-1	Policies related to innovation, research, and development	p. 242
I,R&D-2	Actions and resources related to innovation, research, and development	p. 246
I,R&D-3	Targets related to innovation, research, and development	p. 252
I,R&D-4	Metrics related to innovation, research, and development	p. 252
		Page reference in the annual report
Social Information		
ESRS S1	Own workforce	p. 256
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 256
S1-1	Policies related to own workforce	p. 260
S1-2	Processes for engaging with own workers and workers' representatives about impacts	p. 267
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	p. 269
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	p. 270
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p. 280
S1-6	Characteristics of the undertaking's employees	p. 283
S1-8	Collective bargaining coverage and social dialogue	p. 285
S1-9	Diversity metrics	p. 286
S1-10	Adequate wages	p. 286
S1-14	Health and safety metrics	p. 287
S1-16	Compensation metrics (pay gap and total compensation)	p. 288
S1-17	Incidents, complaints, and severe human rights impacts	p. 289

		Page reference in the annual report
Social Information		
ESRS S2	Workers in the value chain	p. 296
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 296
S2-1	Policies related to value chain workers	p. 298
S2-2	Processes for engaging with value chain workers about impacts	p. 304
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	p. 304
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	p. 306
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p. 312
ESRS S3	Affected communities	p. 313
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 314
S3-1	Policies related to affected communities	p. 314
S3-2	Processes for engaging with affected communities about impacts	p. 318
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	p. 320
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	p. 321
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	p. 324
		Page reference in the annual report
Governance Information		
ESRS G1	Business conduct	p. 326
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 326
G1-1	Corporate culture and business conduct policies and corporate culture	p. 328
G1-2	Management of relationships with suppliers	p. 337
G1-3	Prevention and detection of corruption and bribery	p. 337
G1-4	Confirmed incidents of corruption or bribery	p. 341
Taxes		p. 342
SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	p. 342
TAX-1	Policies related to taxes	p. 342
TAX-2	Metrics related to taxes	p. 345

ESRS 2 – MDR-M – OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the creation and description of the parameters used, description of the assumptions and methodology
GOV-1 The role of the administrative, management, and supervisory bodies	21d	Percentage of administrative, management, and supervisory bodies by gender (gender structure)	Percentage distribution of members by gender (female/male) excluding the category “diverse/non-binary,” which is recognized as a third gender in some countries
GOV-3 Integration of sustainability-related performance in incentive schemes	29d	Proportion of variable remuneration dependent on sustainability-related targets and/or impacts	<p>Upon achievement of certain financial (quantitative) and non-financial (qualitative) targets, a bonus of up to 250% (for the Chair of the Management Board) or 200% (for all other members of the Management Board) is payable; the target agreement for members of the Management Board must include non-financial (qualitative) performance criteria amounting to a maximum of 25% of the variable remuneration</p> <p>Sustainability-related issues are taken into account in the non-financial (qualitative) targets of variable remuneration in the reporting period</p>
ESRS 2 SBM-1	40aiii	Percentage or number of employees by geographical area	Percentage or number of own staff (headcount) by country, including apprentices and non-guaranteed hours employees, excluding interns (during summer breaks or as part of school programs), freelance contractors, diploma students/PhD students
ESRS 2 GOV-1	21a	Number of executive and non-executive members	<p>The governance structure of voestalpine AG is based on a dual management model consisting of the Management Board as the executive body and the Supervisory Board as the supervisory body</p> <p>In accordance with the Articles of Association of voestalpine AG, the Management Board consists of two to six members and the Supervisory Board consists of three to eight members elected by the Annual General Meeting and members appointed in accordance with Section 110 of the Austrian Labor Constitution Act (<i>Arbeitsverfassungsgesetz – ArbVG</i>). At present, the Management Board has six members and the Supervisory Board has twelve members (eight of whom are shareholder representatives and four are employee representatives)</p>
ESRS 2 GOV-1	21e	Percentage of independent board members	As of August 2024, all members of the Supervisory Board elected by the Annual General Meeting qualify as independent within the meaning of the criteria established by the Supervisory Board in accordance with Rule C53 of the Austrian Code of Corporate Governance

Where applicable: description of the sources of measure- ment uncertainty	Resulting degree of accuracy	External validation	Where applicable: planned actions to improve accuracy
–	–	–	–
–	–	The remuneration report for members of the Management Board and Supervisory Board for the BY 2024/25 will be audited by Deloitte Audit Wirtschaftsprüfungs GmbH and submitted for approval at the 33 rd Annual General Meeting of voestalpine AG on July 2, 2025	–
Limited—data represents the individual companies	High	None	–
–	–	–	–
–	–	<p>Compliance with the “C Rules” of the Austrian Code of Corporate Governance by voestalpine AG in the BY 2024/25 (with the exception of Rules 77 – 83) will be audited by Deloitte Audit Wirtschaftsprüfungs GmbH</p> <p>Compliance with Rules 77 to 83 of the Austrian Code of Corporate Governance, insofar as these are “C Rules,” by voestalpine AG in the BY 2024/25 will be audited by WOLF THEISS Rechtsanwälte GmbH & Co KG</p>	–

APPENDIX

ResponsibleSteel

voestalpine commits itself to the 12 Principles of ResponsibleSteel, an advocacy organization. Furthermore, the production entities of the Steel Division completed their certification as sustainable steelmaking facilities pursuant to the ResponsibleSteel Standard in the 2021/22 business year. Experts from voestalpine and many other companies along the steel supply chain as well as civil society representatives and other stakeholders actively participated in the preparation of this Standard.

Principle 1: Corporate governance

ResponsibleSteel certified sites are led responsibly.

Principle 2: Social, environmental, and governance management systems

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

Principle 3: Occupational health and safety

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

Principle 4: Labor rights

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

Principle 5: Human rights

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

Principle 6: Stakeholder engagement and communication

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

Principle 7: Local communities

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

Principle 8: Climate change and greenhouse gas emissions

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

Principle 9: Noise, emissions, effluents, and waste

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

Principle 10: Responsible water use

ResponsibleSteel certified sites demonstrate good water stewardship.

Principle 11: Biodiversity

ResponsibleSteel certified sites protect and conserve biodiversity.

Principle 12: Decommissioning and closure

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

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



UN GLOBAL COMPACT

UN Global Compact—the 10 principles

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

HUMAN RIGHTS

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

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

LABOR STANDARDS

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

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

Principle 5: the effective abolition of child labor; and

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

ENVIRONMENT

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

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

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

ANTI-CORRUPTION

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

WE SUPPORT



SUSTAINABLE DEVELOPMENT GOALS



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

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

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

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

ENVIRONMENTAL INFORMATION

DISCLOSURES REQUIRED BY THE EU TAXONOMY REGULATION

GENERAL INFORMATION ON THE TAXONOMY

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

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

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

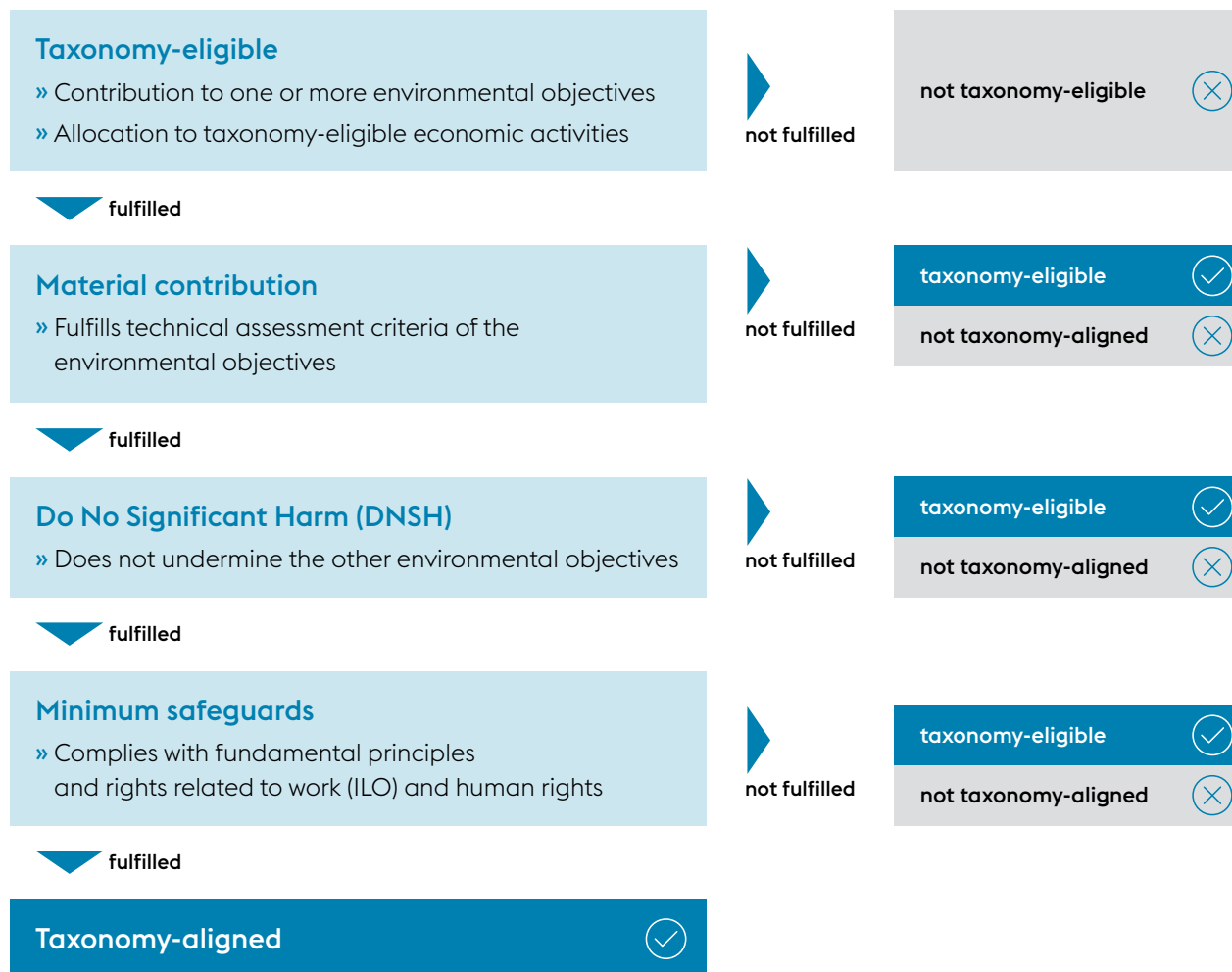
The taxonomy-eligible economic activities must make a significant contribution to at least one of the environmental objectives listed below in order for them to be classified as taxonomy-aligned. In addition, they must not significantly impair the achievement of other environmental goals (Do No Significant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

The EU Regulation identifies six environmental objectives:

- a. Climate change mitigation**
- b. Climate change adaptation**
- c. Sustainable use and protection of water and marine resources**
- d. Transition to a circular economy**
- e. Pollution prevention and control**
- f. Protection and restoration of biodiversity and ecosystems**

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

DESCRIPTION OF THE MULTI-STAGE TAXONOMY PROCESS



IMPLEMENTATION OF TAXONOMY ELIGIBILITY IN THE voestalpine GROUP

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

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

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

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

» 3.9. Manufacture of iron and steel

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

» 6.2. Freight rail transport

The voestalpine Group operates a rail transportation entity that uses the European railway network in Linz, Austria (Steel Division).

» 6.14. Infrastructure for rail transport

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

DETERMINATION OF TAXONOMY ALIGNMENT

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

voestalpine makes comprehensive contributions to climate change mitigation. As far as the business activities related to the production and downstream processing of steel as well as the transportation of freight by rail are concerned, they are generally deemed to contribute substantially to climate action as long as they fulfill the significant contribution to the environmental goal of climate protection pursuant to Category 3.9 and/or 6.2 or are lower than the predefined CO₂ limits on emissions. As far as the business activities of voestalpine Railway Systems 6.14 are concerned, they are generally deemed to make a substantial contribution to climate change mitigation as long as they fulfill the technical assessment criteria set forth in that category. The services of voestalpine Railway Systems fulfill the requirement that they are suitable for the use of trains with no direct CO₂ exhaust emissions. Services for rail tracks that are only intended for the transportation of fossil fuels are not included.

A comprehensive DNSH conformity assessment was carried out for the relevant economic activities (3.9, 6.2, 6.14).

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

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

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

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

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

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

MINIMUM SAFEGUARDS

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

The following guidelines and standards must be complied with:

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

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

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

voestalpine has already surveyed the aforementioned topics of the Platform on Sustainable Finance on a Group-wide basis in the past. This is also covered comprehensively in this sustainability statement (see, for example, sections S1, S2 on human rights, TAX-1 on taxation, and G1 on the topic of anti-corruption).

SIGNIFICANT CHANGES FROM THE PREVIOUS YEAR

Economic activity 3.9. Manufacture of iron and steel

The EU Commission published a new set of FAQs (C/2025/1373) on the EU taxonomy on March 5, 2025.

These FAQs are intended to clarify, among others, which products fall under 3.9. Manufacture of iron and steel and 3.18. Manufacture of automotive and mobility components.

In 3.9. Manufacture of iron and steel, FAQ 11 clarifies that only all process steps specified in Regulation 2019/331 count as the manufacture of iron and steel. These include:

- » coke (coking plant)
- » sintered iron ore
- » hot pig iron (blast furnace)
- » cast iron
- » high-alloy steel produced using the electric arc process
- » carbon steel produced using the electric arc process

Processing steps subsequent to these processes are explicitly excluded from 3.9. Manufacture of iron and steel. Therefore, forming processes such as rolling or forging are no longer part of this economic activity. The last product that falls under 3.9. Manufacture of iron and steel is therefore a slab or billet.

These products represent semi-finished products for voestalpine, most of which are processed internally and only a small proportion of which are sold externally. However, since it was made clear by the FAQs above that the further processing of the semi-finished products no longer included them under 3.9. Manufacture of iron and steel, the taxonomy-eligible and taxonomy-aligned transactions have fallen in the range 3.9. Manufacture of iron and steel. The products that were previously subsumed under 3.9. Manufacture of iron and steel, such as sheets or rods, are now classified as not taxonomy-eligible.

The KPIs for CapEx and OpEx have also been adapted in the FAQs (C/2025/1373). All investments that are necessary for the further processing of steel (e.g., rolling mills, forges) were also classified as not taxonomy-eligible. Since all investments/operating expenditures at the aforementioned sites continue to be included in the CapEx/OpEx KPI, and voestalpine is making significant investments in two EAFs with greentec steel, the key figures in this area have decreased less than the revenue KPI.

As a result of the clarifications made in these FAQs, the KPIs for 3.9 have also been adjusted for the comparative period to reflect the revised treatment of the economic activity.

Economic activity 3.18. Manufacture of automotive and mobility components

The FAQs (C/2025/1373) have also clarified which products fall under item 3.18. Manufacture of automotive and mobility components. FAQ 17 states that only “the essential parts necessary for the environmental performance of the zero-emission vehicle” are covered by this economic activity. These include, for example, “control units, transformers, electric motors, charging connections, and chargers.” Since voestalpine focuses on the production of car body components, these are not included in economic activity 3.18. Manufacture of automotive and mobility components. All items included in this economic activity in the previous reporting period were therefore classified as not taxonomy-eligible, with the result that, in the current business year, voestalpine reports neither revenues nor CapEx/OpEx under 3.18. Manufacture of automotive and mobility components. The previous year's figures have been adjusted accordingly, and for this reason, the current reporting forms no longer include a description of economic activity 3.18.

RESULTS OF THE KPIS

The following summarizes the performance indicators of revenue, investment, and operating expenses from taxonomy-eligible or taxonomy-aligned economic activities of voestalpine for each environmental target for the 2024/25 business year.

REVENUE SHARE/TOTAL REVENUE

In each case for the business year
as of the March 31, 2025 reporting date

	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM (climate change mitigation)	12.2%	14.6%
CCA (climate change adaptation)	0.0%	0.0%
WTR (water and marine resources)	0.0%	0.0%
CE (circular economy)	0.0%	0.0%
PPC (pollution prevention and control)	0.0%	0.0%
BIO (biodiversity)	0.0%	0.0%

CAPEX SHARE/TOTAL CAPEX

In each case for the business year
as of the March 31, 2025 reporting date

	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM (climate change mitigation)	20.4%	38.7%
CCA (climate change adaptation)	0.0%	0.0%
WTR (water and marine resources)	0.0%	0.0%
CE (circular economy)	0.0%	0.0%
PPC (pollution prevention and control)	0.0%	0.0%
BIO (biodiversity)	0.0%	0.0%

OPEX SHARE/TOTAL OPEX

In each case for the business year
as of the March 31, 2025 reporting date

	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM (climate change mitigation)	10.9%	33.6%
CCA (climate change adaptation)	0.0%	0.0%
WTR (water and marine resources)	0.0%	0.0%
CE (circular economy)	0.0%	0.0%
PPC (pollution prevention and control)	0.0%	0.0%
BIO (biodiversity)	0.0%	0.0%

Taxonomy-eligible/aligned revenue

Pursuant to the EU Taxonomy Regulation, revenue as per IAS 1.82(a) must be used to determine the taxonomy-eligible revenue. The revenue figures equate to the revenue shown in the Consolidated Income Statement of this Annual Report and thus are used as the denominator for the calculation in the following table. The numerator includes revenue generated by economic activities covered by the EU Taxonomy Regulation. The current review for alignment in the 2024/25 business year resulted in 12.2% taxonomy-aligned revenue, which is mainly attributable to revenue from the railway

In millions of euros

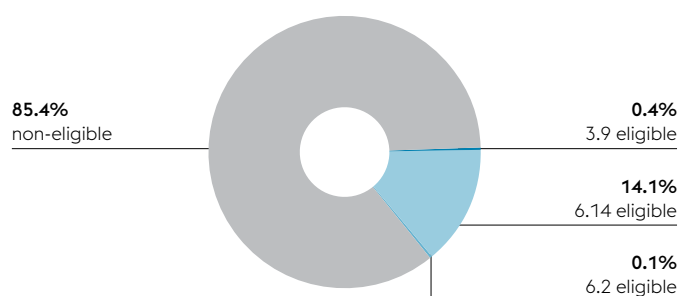
				Substantial Contribution Criteria				
	Code	Revenue	Proportion of revenue 2024/25	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	
Economic activities								
A. Taxonomy-eligible activities								
A.1 Environmentally sustainable activities (taxonomy-aligned)								
Manufacture of iron and steel	CCM 3.9	9.4	0.1%	J	N	N/EL	N/EL	
Freight rail transport	CCM 6.2	20.1	0.1%	J	N	N/EL	N/EL	
Infrastructure for rail transport	CCM 6.14	1,881.7	12.0%	J	N	N/EL	N/EL	
Revenue of environmentally sustainable activities (taxonomy-aligned)		1,911.2	12.2%	12.2%	0.0%	0.0%	0.0%	
Of which enabling				12.0%	N	N/EL	N/EL	
Of which transitional				0.1%				
A.2 Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)								
Manufacture of iron and steel	CCM 3.9/CCA 3.9	54.6	0.3%	EL	EL	N/EL	N/EL	
Freight rail transport	CCM 6.2/CCA 6.2	1.4	0.0%	EL	EL	N/EL	N/EL	
Infrastructure for rail transport	CCM 6.14/CCA 6.14	324.8	2.1%	EL	EL	N/EL	N/EL	
Revenue of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)		380.8	2.4%	2.4%	EL	N/EL	N/EL	
A. Revenue of taxonomy-eligible activities (A.1+A.2)		2,292.0	14.6%	14.6%	EL	N/EL	N/EL	
B. Taxonomy non-eligible activities								
Revenue of taxonomy non-eligible activities		13,451.7	85.4%					
Total		15,743.7	100.0%					

infrastructure segment. Compared to the previous reporting period, revenues from the further processing of steel were no longer identified as taxonomy-eligible/taxonomy-aligned due to a clarification by the EU Commission. The comparative figures have also been adapted accordingly (for more detailed background on the adaptations, see the section Significant changes from the previous year). The adjustment results in taxonomy-eligible and taxonomy-aligned revenue in 3.9. Manufacture of iron and steel of 0.4% compared to 48.2% published in the previous year. This leads to the following classification for the voestalpine Group:

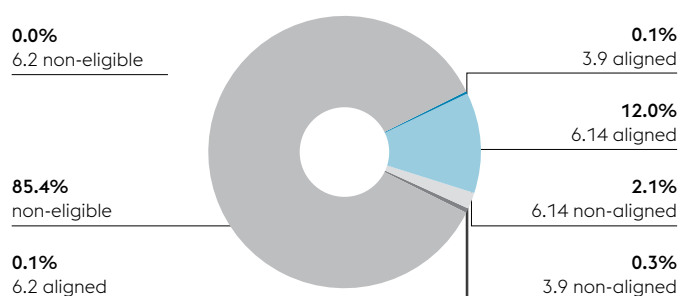
DNSH criteria											
Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum Safeguards	Proportion of taxonomy-aligned (A.1) or -eligible (A.2) revenue 2023/24 ¹	Category enabling activity	Category transitional activity
N/EL	N/EL	J	J	J	J	J	J	J	0.0%		T
N/EL	N/EL	J	J	J	J	J	J	J	0.1%		
N/EL	N/EL	J	J	J	J	J	J	J	10.4%	E	
0.0%	0.0%	J	J	J	J	J	J	J	10.5%		
N/EL	N/EL	J	J	J	J	J	J	J	10.4%	E	
		J	J	J	J	J	J	J	0.0%		T
N/EL	N/EL								0.4%		
N/EL	N/EL								0.0%		
N/EL	N/EL								1.7%		
N/EL	N/EL								2.1%		
N/EL	N/EL								12.6%		

¹ Due to a clarification by the EU Commission, revenue from the further processing of steel was no longer classified under economic activity 3.9. Manufacture of iron and steel, but was classified as not taxonomy-eligible. The previous year's figures have been adjusted accordingly.

TAXONOMY ELIGIBILITY BY ECONOMIC ACTIVITY



TAXONOMY ALIGNMENT BY ECONOMIC ACTIVITY



Taxonomy-eligible/aligned capital expenditure (CapEx)

Additions to assets—including additions from business combinations to property, plant and equipment; intangible assets; and right-of-use assets under leases—were utilized as the basis for determining the taxonomy-eligible CapEx. Investments via joint ventures, investments in financial instruments as well as additions to goodwill were not considered. Due to the clarification of FAQ 2023/305 item 31, which stipulates that capital expenditure should only be recognized when it is recognized in accordance with the relevant invoicing standards, the additions to advance payments made were excluded from the additions to the CapEx KPI. When the underlying property, plant and equipment/intangible assets are capitalized, the advance payments made on the respective asset are reclassified and also allocated to the additions to the CapEx KPI. This approach may result in a shift between the business years. The difference between the capital expenditure used here in the denominator and the data published in chapter D.2. Operating segments relates to goodwill additions and the above-mentioned change in advance payments made. The numerator includes those capital expenditures that relate to assets or processes that are associated with taxonomy-eligible or taxonomy-aligned economic activities and are part of the CapEx plan. In comparison to the previous reporting period, capital expenditure from the processing of steel was no longer reported as taxonomy-aligned due to a clarification by the EU Commission. The comparative figures have also been adapted accordingly (for more detailed background on the adaptations, see the item on significant changes from the

In millions of euros

Substantial Contribution Criteria

	Code	CapEx	Proportion of CapEx 2024/25	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution
Economic activities							
A. Taxonomy-eligible activities							
A.1 Environmentally sustainable activities (taxonomy-aligned)							
Manufacture of iron and steel	CCM 3.9	145.4	12.5%	J	N	N/EL	N/EL
Freight rail transport	CCM 6.2	3.7	0.3%	J	N	N/EL	N/EL
Infrastructure for rail transport	CCM 6.14	88.3	7.6%	J	N	N/EL	N/EL
CapEx of environmentally sustainable activities (taxonomy-aligned)		237.4	20.4%	20.4%	0.0%	0.0%	0.0%
Of which enabling				7.6%	N	N/EL	N/EL
Of which transitional				12.5%			
A.2 Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)							
Manufacture of iron and steel	CCM 3.9/CCA 3.9	190.3	16.3%	EL	EL	N/EL	N/EL
Freight rail transport	CCM 6.2/CCA 6.2	0.3	0.0%	EL	EL	N/EL	N/EL
Infrastructure for rail transport	CCM 6.14/CCA 6.14	22.7	2.0%	EL	EL	N/EL	N/EL
CapEx of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)		213.3	18.3%	18.3%	EL	N/EL	N/EL
A. CapEx of taxonomy-eligible activities (A.1+A.2)		450.7	38.7%	38.7%	EL	N/EL	N/EL
B. Taxonomy non-eligible activities							
CapEx of taxonomy non-eligible activities		715.2	61.3%				
Total		1,165.9	100.0%				

The taxonomy-aligned CapEx of EUR 237.4 million is made up of additions to property, plant and equipment, and intangible assets of EUR 243.0 million and the change in advance payments of EUR –5.6 million. There are no additions to property, plant and equipment, and intangible assets from business combinations. The total CapEx of EUR 1,165.9 million is made up of additions to property, plant and equipment and intangible assets of EUR 1,187.0 million, additions to property, plant and equipment and intangible assets from business combinations of EUR 47.8 million and the change in advance payments of EUR –68.9 million.

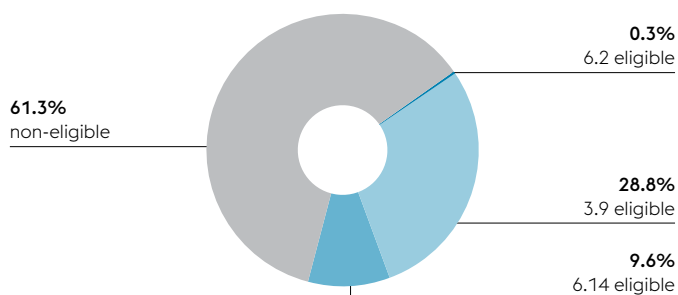
previous year). The adaptation results in taxonomy-eligible and taxonomy-aligned CapEx in the area 3.9. Manufacture of iron and steel of 28.8% compared to 61.9% published in the previous year.

In investment expenditure, the taxonomy-aligned share is 20.4% (EUR 237.4 million). With greentec steel, voestalpine has developed an ambitious phased plan for green steel production. As part of the first stage of the phased plan, one green electricity-powered electric arc furnace (EAF) will be built in Linz and one in Donawitz. This will make it possible to produce around 2.5 million tons of CO₂-reduced steel each year from 2027 following the ramp-up. The greentec steel flagship project is also included in the CapEx plan. The individual processes within the scope of future EAF production are to be regarded as independent production units, which will be integrated into the existing plant configurations at the Linz and Donawitz sites. Taxonomy alignment within the context of economic activity 3.9. Manufacture of iron and steel can be determined for electric arc furnaces as an independent production unit with the corresponding technical evaluation criteria under the environmental objective of climate change mitigation. The CapEx plan has a total volume of EUR 1.5 billion and is expected to be completed in the 2027/28 business year. In the current business year, EUR 134.4 million (2023/24: EUR 64.3 million) were classified as taxonomy-aligned under economic activity 3.9. Manufacture of iron and steel. This leads to the following classification for the voestalpine Group:

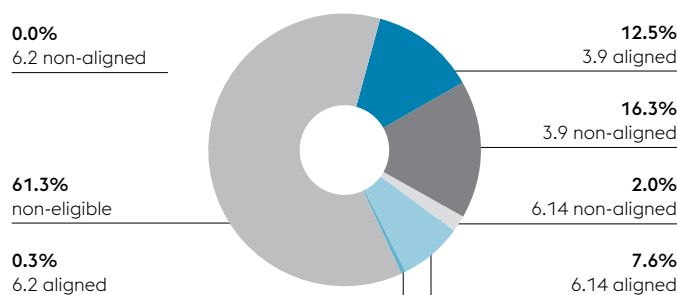
DNSH criteria											
Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum Safeguards	Proportion of taxonomy-aligned (A.1) or -eligible (A.2) CapEx 2023/24 ¹	Category enabling activity	Category transitional activity
N/EL	N/EL	J	J	J	J	J	J	J	10.1%		T
N/EL	N/EL	J	J	J	J	J	J	J	0.3%		
N/EL	N/EL	J	J	J	J	J	J	J	7.5%	E	
0.0%	0.0%	J	J	J	J	J	J	J	17.9%		
N/EL	N/EL	J	J	J	J	J	J	J	7.5%	E	
		J	J	J	J	J	J	J	10.1%		T
N/EL	N/EL								17.3%		
N/EL	N/EL								0.0%		
N/EL	N/EL								1.1%		
N/EL	N/EL								18.4%		
N/EL	N/EL								36.3%		

¹ Due to a clarification by the EU Commission, CapEx from the further processing of steel was no longer classified under economic activity 3.9. Manufacture of iron and steel, but was classified as not taxonomy-eligible. The previous year's figures have been adjusted accordingly.

TAXONOMY ELIGIBILITY BY ECONOMIC ACTIVITY



TAXONOMY ALIGNMENT BY ECONOMIC ACTIVITY



Taxonomy-eligible/aligned operating expenditures (OpEx)

Unlike the revenue and the capital expenditure, the figure for the operating expenditure cannot be taken directly from the annex notes of this Annual Report. This is because only a few expense categories are relevant to the determination of the denominator for the operating expenditure. These include building renovation measures, maintenance and repair of property, plant and equipment, research and development expenses, training expenses for employees, and current leasing expenses. The numerator includes operating expenditures that relate to assets or processes that are associated with taxonomy-eligible or taxonomy-aligned economic activities. In comparison to the previous reporting

In millions of euros

Substantial Contribution Criteria

Economic activities	Code	OpEx	Proportion of OpEx 2024/25	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution
A. Taxonomy-eligible activities							
A.1 Environmentally sustainable activities (taxonomy-aligned)							
Manufacture of iron and steel	CCM 3.9	31.6	3.0%	J	N	N/EL	N/EL
Freight rail transport	CCM 6.2	2.3	0.2%	J	N	N/EL	N/EL
Infrastructure for rail transport	CCM 6.14	80.3	7.7%	J	N	N/EL	N/EL
OpEx of environmentally sustainable activities (taxonomy-aligned)		114.2	10.9%	10.9%	0.0%	0.0%	0.0%
Of which enabling				7.7%	N	N/EL	N/EL
Of which transitional				3.0%			
A.2 Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)							
Manufacture of iron and steel	CCM 3.9/CCA 3.9	229.3	21.9%	EL	EL	N/EL	N/EL
Freight rail transport	CCM 6.2/CCA 6.2	0.1	0.0%	EL	EL	N/EL	N/EL
Infrastructure for rail transport	CCM 6.14/CCA 6.14	8.2	0.8%	EL	EL	N/EL	N/EL
OpEx of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)		237.6	22.7%	22.7%	EL	N/EL	N/EL
A. OpEx of taxonomy-eligible activities (A.1+A.2)		351.8	33.6%	33.6%	EL	N/EL	N/EL
B. Taxonomy non-eligible activities							
OpEx of taxonomy non-eligible activities		694.5	66.4%				
Total		1,046.3	100.0%				

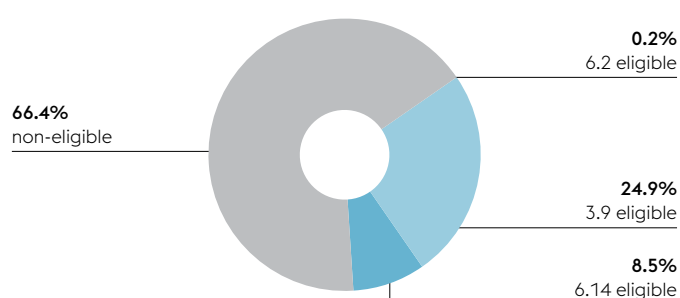
The taxonomy-aligned OpEx of EUR 114.2 million is made up of expenses for research and development of EUR 24.3 million, building renovation measures of EUR 14.1 million, current leasing of EUR 2.2 million, maintenance and repair of property, plant and equipment of EUR 68.3 million, and staff training of EUR 5.3 million. The total OpEx of EUR 1,046.3 million is made up of expenses for research and development amounting to EUR 218.9 million, building renovation measures amounting to EUR 39.7 million, current leasing amounting to EUR 8.7 million, maintenance and repair of property, plant and equipment amounting to EUR 741.6 million, and staff training amounting to EUR 37.4 million.

period, operating expenses from the processing of steel were no longer reported as taxonomy-eligible/taxonomy-aligned due to a clarification by the EU Commission. The comparative figures have also been adapted accordingly (for more detailed background on the adaptations, see the item on significant changes from the previous year). The adjustment results in taxonomy-eligible and taxonomy-aligned OpEx in 3.9. Manufacture of iron and steel of 33.6% compared to 67.3% published in the previous year. Operating expenses from taxonomy-aligned economic activities amount to EUR 114.2 million. This corresponds to 10.9% of operating expenses pursuant to the EU Taxonomy. This leads to the following classification for the voestalpine Group:

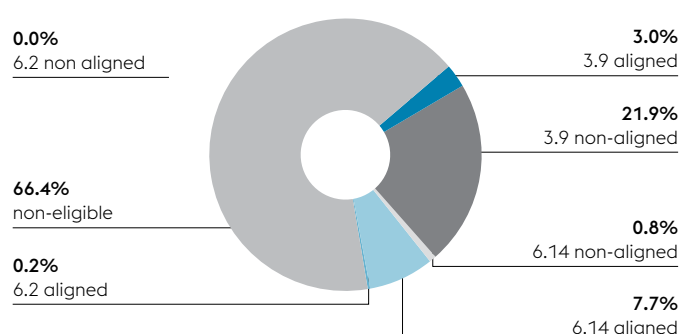
DNSH criteria											
Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum Safeguards	Proportion of taxonomy-aligned (A.1) or -eligible (A.2) OpEx 2023/24 ¹	Category enabling activity	Category transitional activity
N/EL	N/EL	J	J	J	J	J	J	J	4.1%		T
N/EL	N/EL	J	J	J	J	J	J	J	0.1%		
N/EL	N/EL	J	J	J	J	J	J	J	6.5%	E	
0.0%	0.0%	J	J	J	J	J	J	J	10.7%		
N/EL	N/EL	J	J	J	J	J	J	J	6.5%	E	
		J	J	J	J	J	J	J	4.1%		T
N/EL	N/EL								21.1%		
N/EL	N/EL								0.0%		
N/EL	N/EL								0.8%		
N/EL	N/EL								21.9%		
N/EL	N/EL								32.6%		

¹ Due to a clarification by the EU Commission, OpEx from the further processing of steel was no longer classified under economic activity 3.9. Manufacture of iron and steel, but was classified as not taxonomy-eligible. The previous year's figures have been adjusted accordingly.

TAXONOMY ELIGIBILITY BY ECONOMIC ACTIVITY



TAXONOMY ALIGNMENT BY ECONOMIC ACTIVITY



Row	Nuclear energy related activities	
1.	The undertaking carries out, funds, or has exposures to research, development, demonstration, and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2.	The undertaking carries out, funds, or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3.	The undertaking carries out, funds, or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
Fossil gas related activities		
4.	The undertaking carries out, funds, or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5.	The undertaking carries out, funds, or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6.	The undertaking carries out, funds, or has exposures to construction, refurbishment, and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

ESRS E1 CLIMATE CHANGE

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

As part of the Science Based Targets initiative (SBTi), voestalpine is committed to substantially reducing its overall GHG emissions, with the aim of cutting its total Scope-1- and Scope-2-emissions by 30% and Scope-3-emissions by 25% by 2029 compared to the reference year 2019. Efforts are also simultaneously being made to increase the Group's reliance on hydrogen and renewable energies in the pursuit of net-zero emissions by 2050.

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

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

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

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Climate change mitigation	● Scope 1 GHG emissions	As a consequence of its processes, voestalpine is one of Austria's largest carbon emitters. Scope-1-emissions are primarily generated through the production of steel products at the Group's largest sites in Linz and Donawitz
	● Scope 2 GHG emissions	Scope-2-emissions result from purchased energy. These emissions are comparatively low compared with Scope-1-emissions
	● Scope 3 GHG emissions	Scope-3-emissions result from indirect emissions from both the upstream and downstream value chain. More than 80% of Scope-3-emissions can be attributed to the raw materials procured by voestalpine
	○ Transformation of facilities and technologies	voestalpine is committed to reducing its GHG emissions by 30% by 2029, and plans to achieve net-zero emissions by 2050. In light of the (planned) transformation of production processes, investments are being made in environmentally-friendly facilities and technologies
	○ New job infrastructure in the vicinity of voestalpine production facilities	The (planned) transformation of the production processes is expected to create new companies and new/additional jobs in the vicinity of the voestalpine production facilities
	! Transition risk: risks arising from the technical transition of production processes to zero-emission technologies	<p>High investment costs for voestalpine in the transition to new technologies—the shift towards zero-emission steel production requires huge financial resources</p> <p>These investments are being made against the backdrop of an uncertain legal framework, which may lead to additional cost increases</p> <p>In addition, introducing new production processes entails various operational risks for voestalpine, including initially inefficient processes that can only be optimized over time, or operational failures—only in relation to transformation/greentec steel</p>
	! Transition risk: higher expenditure for carbon credits as part of the ETS for voestalpine	<p>Price increases in European emissions trading to which voestalpine is already subject</p> <p>Legislation envisioning the continuous reduction of free carbon allowances is already in place</p>
	! Transition risk: decline in sales volumes and margins due to structural change in European industry and competitive disadvantages due to unilateral European legislation	Migration of consumer industries reduces demand for steel products, while constant production capacity increases price competition. At the same time, lower carbon prices and less regulation for non-EU competitors create competitive disadvantages for EU companies that are not offset by mechanisms such as CBAM

Impact on strategy and business model	Value chain	Time horizon	Affected stakeholders
Adaptation of key production facilities and technologies, as well as the value chain and processes	Group-wide	●●●●	Environment and society
Extensive adaptation of the business model			Local, national, and international authorities
Adaptation of processes and the value chain	Group-wide	●●●●	Environment and society
Establishment of partnerships with energy suppliers			Local, national, and international authorities Suppliers
Establishment of sustainable supply chains	Global	●●●●	Environment and society
Strategic selection of partners			Local, national, and international authorities Suppliers
Transformation of production processes	Focus: Linz and Donawitz	●●●●	Environment
Investing in environmentally-friendly key technologies			Local, national, and international authorities
Strategic selection of partners	Focus: Linz and Donawitz	●●●●	Local communities Suppliers
Adaptation of key production facilities as well as technologies and processes	Focus: Linz and Donawitz	○●●●	Legislators
Adaptation of the business model to low-emission products			Investors Customers
Adaptation of key production facilities as well as technologies and processes	Global	○●●●	Environment Legislators
Tapping into new customer segments	Europe	●●●●	Competitors
Establishment of long-standing customer relationships and competitive advantage			Customers Legislators Investors

Key

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

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Climate change mitigation	+ Transition opportunity: Increasing the sales volumes of sustainable/ low-emission steel products for voestalpine (especially in sectors relevant to the energy transition) leads to a sustainable stabilization of turnover and operating results (EBIT)	Growing demand and corresponding price premium for low-emission steel. This can also lead to a stronger market position in specialized segments such as rail infrastructure systems, special steels, and high-performance materials
	! Transition risk: supply bottlenecks and higher costs for important materials and raw materials	Supply bottlenecks affecting raw materials such as steel scrap and metals, which are in particular demand due to the transformation
Climate change adaptation	! Chronic physical climate risks	Chronic physical risks can damage voestalpine's business in a number of ways, including exposure to significant changes in river water levels due to climate change, which have the potential to affect shipping (e.g., on the Danube) and cause disruption in the supply chain
	! Acute physical climate risks	Acute physical risks can impact voestalpine's business in a number of ways. Major acute physical risks include heavy rain, floods, and landslides
Energy	● Direct energy consumption	voestalpine's value creation processes are highly energy intensive. This not only results in emissions from the consumption of energy and electricity, but also increases the complexity of the energy transition towards renewable energies at voestalpine sites and requires capacities on the electricity grids needed for the energy transition
	! Transition risk: bottlenecks in the energy supply at major production sites (in particular Linz and Donawitz) and higher costs for energy procurement (renewable and non-renewable sources) due to the energy transition in Europe	Risk of rising energy costs due to price increases etc., as well as the volatile energy market situation, along with the risk of supply bottlenecks, especially for renewable energies (electricity) in the wake of the energy transition

Impact on strategy and business model	Value chain	Time horizon	Affected stakeholders
Development of new business models and changes to the product portfolio	>>>	●●●●	Competitors
	Europe		Investors
			Customers
Establishment of resilient supply chains and long-standing supplier relationships	>>>	○●●●	Suppliers
	Europe		
Increased risk diversification	>>>	○●●●	Customers
Site and process adaptation	Global		Suppliers
Establishment of resilient supply chains			
Increased risk management	>>>	○●●●	Suppliers
	Global		Customers
Establishment of resilient supply chains			
Adaptation of key production facilities and technologies, as well as the value chain and processes	>>>	●●●●	Environment
	Group-wide		Local, national, and international authorities
			Suppliers
Investments in own energy generation	>>>	●●●●	Suppliers
Long-term energy contracts and partnerships	Focus: Linz and Donawitz		
Adaptation of the value chain			

Key

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

STRATEGY

E1-1 – Transition plan for climate change mitigation

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

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

The Climate Transition Plan does not yet envisage targets below the 1.5°C target to limit global warming. The first stage of the plan and the necessary financial resources, namely a EUR 1.5 billion investment budget, have been given the go ahead for execution by the Management Board and Supervisory Board.

voestalpine also pursues the medium-term target of reducing its Scope-1- and Scope-2-emissions by 50% by business year 2035/36 and achieving net-zero emissions in the long term by the business year 2049/50 at the latest. Neither of these targets have been validated by the SBTi.

Implementation of this Climate Transition Plan is based on various decarbonization levers that cover the entire value chain. These include industrial electrification, with coal-fired blast furnaces replaced by electric arc furnaces (EAF) as the primary measure, the use of renewable energies to reduce CO₂ emissions, and improving energy efficiency in production processes and infrastructure. The supply chain is also actively involved in the decarbonization process through measures such as increasingly relying on CO₂-reduced input materials and optimizing the use of raw materials.

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

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

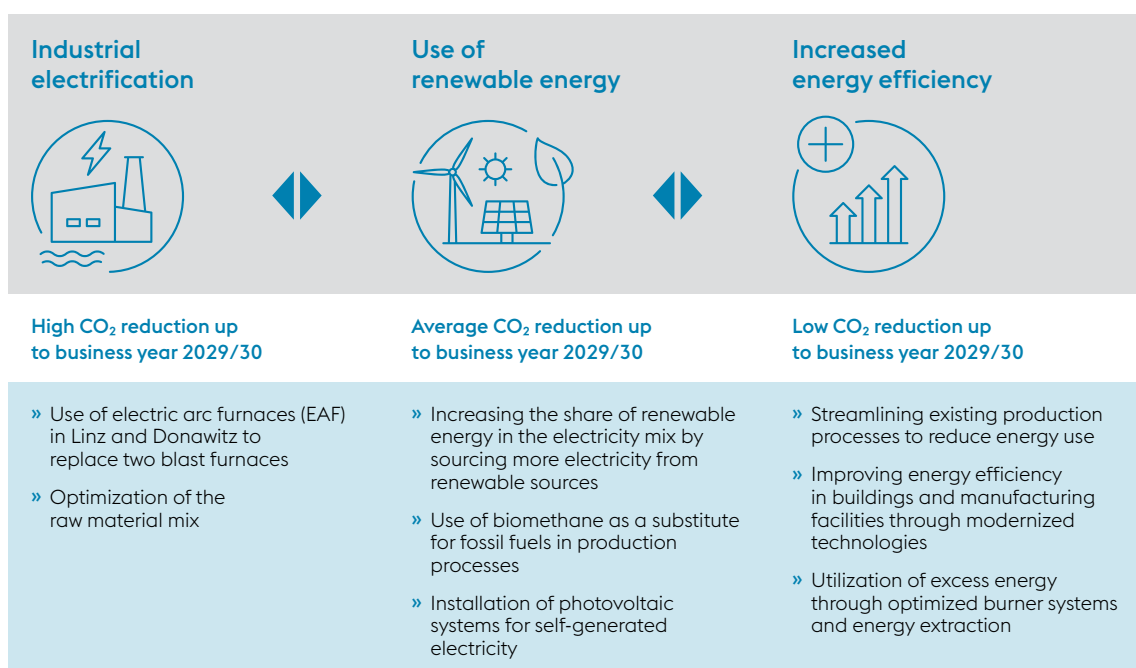
The sustainability strategy constitutes an integral part of the Group's strategy, uniting economic, social, and environmental aspects and targets. In order to achieve the objectives set forth in its strategy, voestalpine is relying on central decarbonization levers that facilitate the transition to lower-emission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

Decarbonization levers

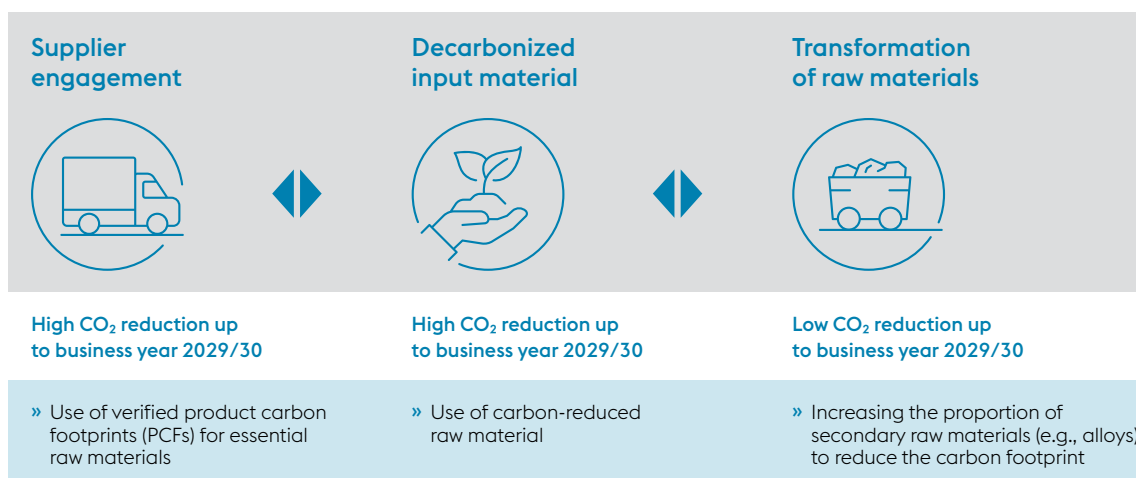
The decarbonization levers are divided into three phases to achieve net-zero by 2049/50. The first phase runs until 2029/30 and contains clearly defined levers such as energy efficiency, industrial electrification, and the use of renewable energies to reduce Scope-1- and -2-emissions, along with supplier engagement and the use of decarbonized input materials to bring down Scope-3-emissions. Phase 2 and phase 3 will be specified in more detail over time, but their primary aims are to extensively transform processes and to fully decarbonize and offset remaining emissions. The graphic below outlines the key decarbonization levers. Please consult chapter E1-3 Actions and resources in relation to climate change policies for more detailed information on the individual actions assigned to the decarbonization levers.

Phase 1—Decarbonization levers:

SCOPE 1 & 2



SCOPE 3



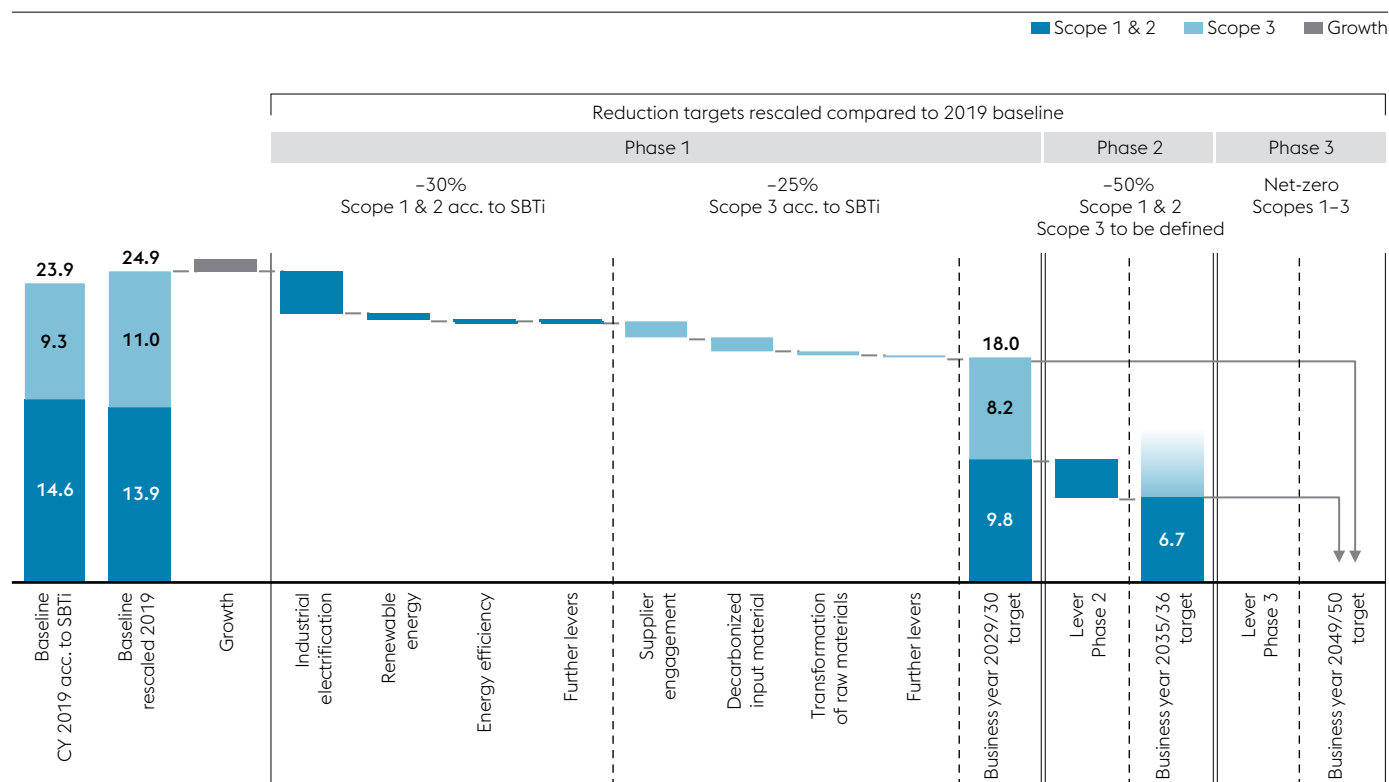
Phase 2—Scope 1 & 2 decarbonization levers:

Phase 2 of the decarbonization levers involves making further progress on industrial electrification and scaling carbon capture and storage (CCUS). These levers aim to further reduce process-related emissions and facilitate the gradual switch to renewable energy sources. voestalpine makes continuous progress on advancing these technologies—including working on specific fields of application, building technical pilot plants, and incorporating the latest scientific findings from its own research activities along with findings arising from national and international R&D partnerships.

Phase 3—Scope 1 & 2 decarbonization levers:

Phase 3 marks the final step towards net-zero and is geared towards the full decarbonization of all emission sources. During this phase, the focus is on an approach that is open to all technology and creates opportunities for various solutions. Future developments and innovations will play a central role in sustainable emissions reduction or offsetting, thereby facilitating the lasting transition to a climate-neutral industry.

CLIMATE TRANSITION PLAN



Investments and funding supporting climate change mitigation and climate change adaptation

In order to utilize the decarbonization levers as part of its decarbonization sustainability strategy and the EU Taxonomy, voestalpine launched a five-year CapEx plan in the business year 2023/24. Around EUR 1.5 billion has been earmarked for investment in the climate protection program greentec steel, which forms a key component of the company's Climate Transition Plan.

The plan focuses on clearly defined decarbonization levers, which make a significant contribution to the transformation towards more climate-friendly production. As things currently stand, all related steps are progressing as scheduled without any delays. The investments are closely linked to the requirements of disclosure requirement E1-3 Actions and resources in relation to climate change policies and support both the achievement of the long-term climate targets and safeguarding voestalpine's competitive standing in the global market.

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

CapEx from taxonomy-aligned activities is used as a key performance indicator to measure the progress of the actions as part of the decarbonization levers. In the current business year, a total of EUR 237.4 million of CapEx was reported as taxonomy-aligned (see also the chapter on EU Taxonomy), where EUR 145.4 million is attributed to the economic activity 3.9 Manufacture of iron and steel, of which, in turn, EUR 134.4 million represents greentec steel investments. No significant CapEx amounts were invested during the reporting period in relation to coal, oil, and gas-related economic activities.

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

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

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

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

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

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

- » a Climate Transition Plan for decarbonization
- » the use of environmental and energy management systems at relevant locations

The Climate Transition Plan and the Environmental and Energy Management Plan are closely linked to voestalpine's sustainability strategy and support the company's long-term competitive standing.

POLICY OVERVIEW

IROs addressed	Policy	Core content
Scope-1-to-3-emissions Transformation of facilities and technologies in the vicinity of voestalpine production sites New job infrastructure in the vicinity of voestalpine production sites Transition risk: higher expenditure for carbon credits as part of the ETS for voestalpine Transition opportunity: increase in sales volumes for sustainable/low-emission steel products Transition risk: risks arising from the technical transition of production processes to zero-emission technologies	Climate Transition Plan (phased decarbonization plan)	Phased GHG reduction plan Includes the voestalpine greentec steel climate protection program for green steel production Concept for the implementation of the short-, medium-, and long-term GHG reduction targets with the achievement of the final target of net-zero by 2050
Direct energy consumption	Environmental and energy management systems at relevant sites	Implementation of environmental and energy management systems certified according to ISO 14001, ISO 50001, EMAS, or equivalent at sites with high energy requirements/consumption to increase energy efficiency (if not yet available)

The implementation of the greentec steel program within the framework of the Climate Transition Plan facilitates the sustainable development of the core business by gradually introducing low-emission technologies and optimizing existing processes. This ensures that steel production meets both the regulatory requirements and the increasing market requirements for climate-friendly products.

The environmental and energy management approach helps to realize operational efficiency gains and bring down energy costs, thereby promoting the economic stability of the company. The introduction of ISO 14001, ISO 50001, EMAS-certified systems ensures energy use is systematically optimized, thereby improving both resource use and long-term profitability.

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

Scope of the policy	Responsibility and monitoring	Other comments
Own operations	Management Board and Supervisory Board of voestalpine AG	Commitment according to SBTi Communicated in the Annual Report
Partially upstream and downstream value chain		Communicated in the Annual Report
Own operations	Management boards of the divisions	Communicated in the Annual Report
Partially upstream and downstream value chain		

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

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

Phase 1—Scope 1 & 2 decarbonization levers:

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

These measures are currently being implemented and the aim is to generate around 2.5 million tons of CO₂-reduced steel annually from the business year 2027/28 onwards. The greentec steel program therefore represents a key building block in the CapEx plan with significant capital expenditure of EUR 1.5 billion, of which EUR 134.4 million has been reported as taxonomy-aligned in the business year 2024/25 (see also disclosures under E1-1 Transition plan for climate change mitigation). The financial resources for the implementation of the measures under the greentec steel program from phase 1 have already been approved.

Of the EUR 1.5 billion, EUR 498.9 million had already been invested by the end of the business year 2024/25 (of which EUR 244.5 million was invested in the business year 2024/25). Further information on investments to the amount of EUR 244.5 million for implementation of the measures made in the business year can be found in the Consolidated Financial Statements prepared in accordance with International Financial Reporting Standards (IFRS) (see chapter D.9 Property, plant, and equipment, and chapter D.10 Intangible assets in the Consolidated Financial Statements (IFRS)).

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

Increasing energy efficiency includes targeted measures such as optimizing production processes and improving the energy performance of manufacturing facilities and buildings with state-of-the-art technology. Another key aspect is the optimization of combustion systems and the efficient use of excess energy by decoupling energy for use in other applications, such as supplying heat to adjacent operating units or supplying external grids. This lever likewise supports the achievement of voestalpine's climate targets up to the business year 2029/30 initially.

Scope 1 & 2: decarbonization levers phase 2 and 3

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

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

The focus is on replacing the remaining fossil pig iron capacity using fossil-free energy sources such as hydrogen, renewable energy, and the extensive application of CCUS technologies.

Scope 3: decarbonization levers

voestalpine is focusing on taking targeted action within its value chain to bring down indirect Scope 3 GHG emissions by the business year 2029/30. A key decarbonization lever in this regard is supplier engagement, which includes the use of verified Product Carbon Footprints (PCFs) for essential raw materials and close cooperation with suppliers for emission reduction. The sustainable transformation is also supported by the gradual substitution of primary and secondary raw materials (e.g., scrap and replacing primary alloys with reprocessed alloys), especially with regard to the interdependencies of future production with electric arc furnaces (EAFs).

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

The focus is on an approach that is open to all technology types and creates opportunities for various solutions. Future developments and innovations will play a central role in sustainable emissions reduction or offsetting, thereby facilitating the lasting transition to a climate-neutral industry.

Further action:

Actions to counter physical climate risks

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

Direct energy consumption actions

In the divisions and at the sites, measures to reduce direct energy requirements are being implemented on an ongoing basis with the aim of improving existing processes and facilities. Corresponding action is being financed and implemented within the framework of the investment programs and continuous improvement processes.

Further activities to address competitive disadvantages resulting from the transition and structural change in European industry

voestalpine pursues targeted action to mitigate the risks arising from competitive disadvantages and structural change in European industry. These actions focus on the development of innovative products as well as acquiring new customers and tapping into new industries and geographic markets to stand out from the competition. voestalpine primarily addresses high-quality market segments and targets new customers by increasingly standing out in terms of product quality, flexibility, and service. voestalpine's growing internationalization in high-yield processing fields based on the local for local principle likewise helps to safeguard the company's competitive standing.

OVERVIEW OF ACTIONS

IROs addressed	Action	Core content and expected results
<p>Scope-1-to-3-emissions</p> <p>Transformation of facilities and technologies in the vicinity of voestalpine production sites</p> <p>New job infrastructure in the vicinity of voestalpine production sites</p> <p>Transition risk: higher expenditure for carbon credits as part of the ETS for voestalpine</p> <p>Transition opportunity: increase in sales volumes for sustainable/ low-emission steel products</p> <p>Transition risk: risks arising from the technical transition of production processes to zero-emission technologies</p>	<p>Phased implementation for the transformation</p> <p>(Planned) measures for the Climate Transition Plan (incl. greentec steel)</p>	<p>Actions for Scope 1 & 2 emissions:</p> <p>» Industrial electrification: Use of EAFs at the sites in Linz and Donawitz (greentec steel stage 1); adaptation of the raw material structure by integrating the EAFs into existing plant configuration; transition from fossil energy (natural gas) to electricity in selected production and manufacturing processes</p> <p>Expected results: Reduction of direct and indirect GHG emissions by 3.4 million tons by the BY 2029/30 (Scope 1 & 2)</p> <p>» Renewable energy: purchase of electricity from renewable sources; transition to renewable energy sources in production and manufacturing processes, e.g., use of biomethane; self-generation using PV installations</p> <p>Expected results: Reduction of direct and indirect GHG by 0.6 million tons by the BY 2029/30 (Scope 1 & 2)</p> <p>» Energy efficiency: increasing the energy efficiency of existing production and manufacturing processes; optimizing combustion systems; energy decoupling</p> <p>Expected results: Reduction of direct and indirect GHG emissions by 0.1 million tons by the BY 2029/30 (Scope 1 & 2)</p> <p>Actions for Scope 3:</p> <p>» Supplier Engagement: use of supplier-specific data (verified PCFs) for all essential raw materials</p> <p>Expected results: Reduction of indirect GHG emissions by 1.3 million tons by the BY 2029/30 (Scope 3)</p> <p>» Transformation of raw materials: transition of the raw material structure by integrating electric arc furnaces into the existing plant configuration at the Linz and Donawitz sites; substituting primary raw materials with secondary raw materials (e.g., alloys)</p> <p>Expected results: Reduction of indirect GHG emissions by 0.3 million tons by the BY 2029/30 (Scope 3)</p> <p>» Use of decarbonized input materials</p> <p>Expected results: Reduction of indirect carbon emissions by 1.1 million tons by the BY 2029/30 (Scope 3)</p> <p>» Further actions for Scope 1 & 2 & 3 emissions</p> <p>Expected results: Reduction of direct and indirect GHG emissions by 0.1 million tons by the BY 2029/30 (Scope 1 & 2 & 3)</p> <p>Expected overall results: Reduction of direct and indirect GHG emissions and mitigation of the transition risks and exploitation of opportunities presented</p>
<p>Transition risk: supply bottlenecks or higher costs for important raw and other materials</p> <p>Transition risk: bottlenecks in the energy supply at major production sites (in particular Linz and Donawitz) and higher costs for energy procurement (renewable and non-renewable sources) due to the energy transition in Europe</p>	<p>Actions to account for transition risks arising from resource bottlenecks in relation to decarbonization</p>	<p>Long-standing contracts to cover delivery quantities</p> <p>Actions to promote the circular economy (see chapter E5-2)</p> <p>Diversification of suppliers</p> <p>Expected results: guaranteed delivery quantities</p>

Time horizon	Scope of the action	Responsibility and monitoring	Significant expenditure (if relevant)	Other comments
<p>Implementation by the BY 2029/30, commissioning of EAFs in Linz and Donawitz in 2027</p> <p>Differentiation between actions taken and planned actions</p>	<p>Own operations</p> <p>Upstream and downstream value chain to a partial extent</p>	<p>Management Board and Supervisory Board of voestalpine AG</p> <p>Monitoring of near-term Science Based Targets (SBTi)</p>	CapEx greentec steel phase 1: EUR 1.5 billion	Progress according to schedule (ongoing implementation)

Ongoing implementation	<p>Own operations</p> <p>Partially upstream and downstream value chain</p>	Management boards of the divisions		
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IROs addressed	Action	Core content and expected results
Chronic physical climate risks Acute physical climate risks	Actions to counter physical risks	Construction to protect against physical climate risks (adaptation solutions), e.g., flood protection project in Unterer Tollinggraben Expected results: resilience against natural events ensured
Direct energy consumption	Actions to reduce energy requirements	CIP actions and project-related actions in the divisions that contribute to reducing voestalpine's energy consumption, such as e-wind turbine in the Steel Division Expected results: a reduction in direct energy consumption and increased energy efficiency

METRICS AND TARGETS

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

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

In order to achieve this target, voestalpine is committed to a science-based 2°C reduction path (well-below 2°C) in accordance with the SBTi, which aligns with the Paris Agreement and supports global efforts to limit global warming. The current Climate Transition Plan was not drafted under the premise of targets below the 1.5°C target to limit global warming (see E1-1 Transition plan for climate change mitigation).

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

Time horizon	Scope of the action	Responsibility and monitoring	Significant expenditure (if relevant)	Other comments
Project-dependent	Own operations	Management boards of the divisions	CapEx according to investment program	Project-dependent progress
Ongoing implementation/ project-dependent	Own operations	Management boards of the divisions	CapEx/OpEx	Progress according to schedule (ongoing implementation)

More specifically, the company is committed to reducing its Scope-1- and Scope-2-emissions by 30% and its Scope-3-emissions by 25% by the business year 2029 as part of the SBTi. The GHG emissions covered are described in E1-6. voestalpine also pursues the medium-term target of reducing its Scope- 1- and Scope-2-emissions by 50% by the business year 2035/36 and achieving net-zero emissions in the long term by business year 2049/50 at the latest. Neither of these targets have been validated by the SBTi.

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

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

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

An assessment took place on the basis of five defined categories and thresholds to determine whether a rescaling of the initial calculations is necessary, for example due to structural changes in the Group, methodological developments, or new scientific findings. Due to the recalculation of the GHG balance for the base year 2019 (as a result of the sale of the HBI plant in Texas, for example), the absolute emission levels in t CO₂e have changed in light of the revision of the initial data. This led to the recalculation and re-validation of the absolute target variables according to the valid SBTi standards. In the next business year, namely 2025/26, voestalpine plans to consider updating the targets under the SBTi.

The set GHG emission reduction targets pertain to the material impacts, opportunities, and risks related to climate change mitigation, climate change adaptation, and reducing the physical climate risks and transition risks to which voestalpine is exposed. The targets cover the company's own operations as well as the upstream value chain, in particular raw materials, energy, and input materials. Responsibility for monitoring progress on target attainment as part of the Climate Transition Plan lies with the Management Board and Supervisory Board of voestalpine AG. Progress has been made on the targets with the divisions and the Head of Sustainability Management at voestalpine.

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

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

Near-term targets	2019	Rescaled 2019	Business year 2029/30
In million tons of CO₂e			
Scope 1 & 2	14.6	13.9	9.8
Scope 3	9.3	11.0	8.2

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

KPI	Reduction of Scope 1 & 2/Scope 3 GHG emissions	
UNIT	% CO ₂ e reduction	
REFERENCE VALUE	REPORTED	TARGET VALUE
13.9 million t Scope 1 & 2 CO ₂ e 11.0 million t Scope 3 CO ₂ e 2019	12.9 million t Scope 1 & 2 CO ₂ e 9.8 million t Scope 3 CO ₂ e Business year 2024/25	-30% Scope 1 & 2 -25% Scope 3 Business year 2029/30
Responsibility and monitoring	Management Board and Supervisory Board of voestalpine AG	
Scope	Own operations (Scope 1 & 2); global value chain (Scope 3)	
Stakeholders	Environment, society, authorities, suppliers, customers, investors	
IROs addressed	See E1-2 Climate Transition Plan	
Relation to policy	Climate Transition Plan (phased decarbonization plan)	

TARGET: GHG REDUCTION (MID-TERM TARGET)

KPI	Reduction of Scope 1 & 2 GHG emissions		
UNIT	% CO ₂ e reduction		
REFERENCE VALUE	▶	REPORTED	TARGET VALUE
13.9 million t Scope 1 & 2 CO ₂ e 2019		12.9 million t Scope 1 & 2 CO ₂ e Business year 2024/25	-50% Scope 1 & 2 Business year 2035/36
Responsibility and monitoring	Management Board and Supervisory Board of voestalpine AG		
Scope	Own operations (Scope 1 & 2)		
Stakeholders	Environment, society, authorities, suppliers, customers, investors		
IROs addressed	See E1-2 Climate Transition Plan		
Relation to policy	Climate Transition Plan (phased decarbonization plan)		

TARGET: NET-ZERO

KPI	Net-zero (Scope 1, 2, 3)		
UNIT	CO ₂ e emissions (CO ₂ e)		
REFERENCE VALUE	▶	REPORTED	TARGET VALUE
24.9 million t CO ₂ e 2019		22.7 million t CO ₂ e Business year 2024/25	Net-zero CO ₂ e Business year 2049/50
Responsibility and monitoring	Management Board and Supervisory Board of voestalpine AG		
Scope	Own operations (Scope 1 & 2); global value chain (Scope 3)		
Stakeholders	Environment, society, authorities, suppliers, customers, investors		
IROs addressed	See E1-2 Climate Transition Plan		
Relation to policy	Climate Transition Plan (phased decarbonization plan)		

E1-5 – Energy consumption and mix

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

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

Information on the Group's total energy consumption can be found in the table below:

ENERGY CONSUMPTION AND MIX

	2024/25
Fossil feedstocks for metallurgical processes	
0) Use of coal and coal products for metallurgical processes (MWh)	26,672,394
Fossil energy	
1) Fuel consumption from coal and coal products (MWh)	170
2) Fuel consumption from crude oil and petroleum products (MWh)	190,994
3) Fuel consumption from natural gas (MWh)	6,127,776
4) Fuel consumption from other fossil sources (MWh)	7,556
5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	942,276
6) Total fossil energy consumption (MWh)	7,268,772
Share of fossil sources in total energy consumption (%)	82
Nuclear energy	
7) Consumption from nuclear sources (MWh)	223,822
Share of consumption from nuclear sources in total energy consumption (%)	3
Renewable energy sources	
8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	67,306
9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	1,149,954
10) Consumption of self-generated non-fuel renewable energy (MWh)	143,069
11) Total renewable energy consumption (MWh)	1,360,329
Share of renewable sources in total energy consumption (%)	15
12) Total energy consumption (MWh)	8,852,923
including fossil energy for metallurgical processes (MWh)	35,525,317

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

voestalpine generates electricity in its captive power plants from process gases and uses it to drive both the production process and the downstream processing steps. This enables the Group to cover a large part of its electricity requirements from its own generation. voestalpine currently also uses renewable energy produced by hydropower. Generation from renewable sources amounts to 143,069 MWh, while generation from non-renewable sources comes to 1,469,741 MWh.

Energy intensity based on net revenue:

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

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

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

ENERGY INTENSITY BASED ON NET REVENUE

	2024/25
Energy intensity per net revenue	
Total energy consumption from activities in high climate impact sectors (MWh)	8,852,923
Net revenue from activities in high climate impact sectors (EUR million)	15,705.0
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/EUR million)	564

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

In millions of euros	2024/25
Energy intensity connectivity	
Net revenue from activities in high climate impact sectors used to calculate energy intensity	15,705.0
Net revenue (other)	38.7
Total net revenue (financial statements)	15,743.7

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

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

Data collection, GHG modeling, and the presentation of findings are subject to external verification in accordance with ISO 14064-3. The GHG reporting system limits correspond to the voestalpine consolidation limits (see Consolidated Financial Statements) and include domestic and foreign fully consolidated companies over which voestalpine exercises operational control, taking into account materiality limits for Scope 1 and Scope 2 emissions in GHG accounting. The materiality assessment identified the most significant Scope-3-categories, which led to an adaptation of the reporting in the business year of 2024/25 compared to previous years. The change affects the comparability of the reported GHG emissions between the reporting periods and is explained in this chapter.

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

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

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

Scope-3-GHG emissions are largely based on secondary data, as primary data from suppliers or other partners in the value chain is not yet available in the comprehensive quality required. The scopes shown cover carbon emissions and other climate-relevant GHG emissions in accordance with the Kyoto Protocol and the GHG Protocol standard. Accordingly, Scope-3-emissions of consolidated entities are taken into account, whereas Scope-3-emissions of non-consolidated entities are not taken into account. For other entities in the value chain, indirect issues are taken into account in category 1 “purchased goods.” All emission levels are reported in CO₂ equivalents (CO₂e).

GHG EMISSIONS

	Retrospective		Milestones and target years			
	Base year	Current BY 2024/25	Current BY 2024/25	Near-term target 2029/30	Long-term- target 2049/50	Annual % target/ base year
Scope-1-GHG emissions				9.8	Net-zero emissions	
Gross Scope-1-GHG emissions (million t CO ₂ e)	12.8	12.1	12.1			
Percentage of Scope-1-GHG emissions from regulated emission trading schemes (%)	98	98	98			
Scope-2-GHG emissions						
Gross location-based Scope-2-GHG emissions (million t CO ₂ e)	0.5	0.6	0.6			
Gross market-based Scope-2-GHG emissions (million t CO ₂ e)	1.1	0.8	0.8			
Significant Scope-3-GHG emissions				8.2		
Total gross indirect (Scope 3) GHG emissions (million t CO ₂ e)	11.0	9.8	9.8			
3.1 Purchased goods and services	9.3	8.3	8.3			
3.2 Capital goods	-	0.1	0.1			
3.3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	0.7	0.5	0.5			
3.4 Upstream transportation and distribution	0.6	0.6	0.6			
3.5 Waste generated in operations	0.03	0.03	0.03			
3.6 Business travel	immaterial		immaterial			
3.7 Employee commuting	immaterial		immaterial			
3.8 Upstream leased assets	immaterial		immaterial			
3.9 Downstream transportation	0.4	0.4	0.4			
3.10 Processing of sold products	immaterial		immaterial			
3.11 Use of sold products	immaterial		immaterial			
3.12 End-of-life treatment of sold products	immaterial		immaterial			
3.13 Downstream leased assets	immaterial		immaterial			
3.14 Franchises	immaterial		immaterial			
3.15 Investments	immaterial		immaterial			
Total GHG emissions						
Total GHG emissions (location-based) (million t CO ₂ e)	24.3	22.5	22.5			
Total GHG emissions (market-based) (million t CO ₂ e)	24.9	22.7	22.7	18.0	net-zero	

Scope-1-emissions

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

No biogenic CO₂ emissions from biomass combustion were emitted in the reporting period.

Scope-2-emissions

voestalpine uses two methods to calculate Scope-2-GHG emissions:

» Location-based method:

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

» Market-based method:

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

The share of market-based Scope-2-GHG emissions covered by contractual instruments is 32%. Contractual instruments from energy suppliers that meet the requirements of the GHG Protocol were taken into account, including guarantees of origin and declared electricity mix information.

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

Direct biogenic GHG emissions resulting from biomass combustion but not included in Scope 2 are reported separately in Scope 1. A breakdown of the biogenic CO₂ content is not possible for the emission factors used to calculate Scope-2-GHG emissions and is therefore not included in the report.

Scope-3-emissions

As part of the materiality assessment, voestalpine conducts an evaluation of all Scope-3-categories to identify the main indirect GHG emissions in its value chain. Categories with a share of less than 1%

of corporate emissions or categories that are not relevant under the Greenhouse Gas Protocol are not considered material and are therefore not included in the GHG footprint. In the business year 2024/25, this concerned the following categories:

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

Supplier engagement improves Scope-3-data quality

As part of supplier engagement, verified product carbon footprints (PCFs) are collected from suppliers and accounted for in the GHG footprint. Currently, GHG accounting is primarily based on secondary data from databases that do not record a reporting period. The proportion of primary data is still low and is preferably obtained from carbon footprints, for example from verified environmental product declarations (EPDs). The data published in Life Cycle Assessments (LCA) and verified externally are valid for up to five years. Due to the available data quality, primary data on Scope-3-emissions is not used for GHG accounting.

No biogenic CO₂ emissions from biomass combustion or bioremoval were emitted along the value chain in the reporting period.

The following tables show the GHG intensity per net revenue and the connectivity of GHG intensity.

GHG INTENSITY PER NET REVENUE

	2024/25
Total GHG emissions (location-based) per net revenue (t CO ₂ e/EUR million)	1,429.1
Total GHG emissions (market-based) per net revenue (t CO ₂ e/EUR million)	1,441.8
Net revenue used to calculate GHG intensity:	
Total net revenue (financial statements) (EUR million)	15,743.7

OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the metrics used; description of the assumptions and methodology
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	44. 46–52	GHG footprint	The GHG footprint is calculated on the basis of the consumed volumes of energy, materials, and raw materials recorded as part of the Group data collection, as well as secondary data (emission factors of databases and energy suppliers) according to the GHG Protocol
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	48a	Scope-1-emissions	This parameter is calculated by aggregating the Scope-1-emissions of the individual companies, data which is requested as part of a Group-wide data collection. If carbon monitoring takes place according to ETS, the results are compared using monitoring evidence or using the calculation based on fossil fuel use with the inclusion of relevant emission factors
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	AR 43c	Biogenic CO ₂ emissions from biomass combustion or bioremoval	The use of biomass as a source of energy is recorded as part of Group-wide data collection and carbon emission factors are calculated on the basis of CO ₂ emissions
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	48b	Percentage of Scope-1-GHG emissions covered by EU ETS	Aggregation of Scope-1-emissions of all Group companies covered by the EU ETS
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	49	Scope-2-emissions (location- and market-based)	Scope-2-emission factors (location- and market-based) are calculated on the basis of the energy purchases reported as part of Group-wide data collection, as well as the reported emission factors of energy suppliers or regional emission factors from data bases
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	51	Total Scope-3-emissions	Scope-3-emissions are determined on the basis of the input volumes of material flows, raw materials, and energy carriers reported as part of Group-wide data collection and using secondary background data sets (emission factors)
E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	53–55	Greenhouse gas intensity Net revenue to calculate GHG intensity	Calculation of greenhouse gas intensity based on reported total greenhouse gas emissions for the reported net revenue Reference to financial reporting
E1-5 Energy consumption and mix	37–38	Total energy consumption	Aggregation of energy consumption from the Group companies collected as part of the Group-wide data collection
E1-5 Energy consumption and mix	40	Energy intensity	Calculation of energy intensity based on reported total energy consumption and reported net revenue

Where applicable: description of the sources of measurement uncertainty	Resulting level of accuracy	External validation	Where applicable: measures planned to improve accuracy
Sources of measurement uncertainty relate to the carbon analyses, consumption collection systems in place at the Group companies, underlying data sets, and the extrapolation of quarterly figures	High (+/-3%)	Yes	Ongoing development and expansion of data collection and evaluation
Sources of measurement uncertainty relate to the carbon analyses, consumption collection systems in place at the Group companies, and the extrapolation of quarterly figures	High (+/-3%)	Yes	Ongoing development and expansion of data collection and evaluation
Sources of measurement uncertainty relate to the carbon analyses, consumption collection systems in place at the Group companies, and the extrapolation of quarterly figures	High (+/-3%)	-	Ongoing development and expansion of data collection and evaluation
No further uncertainty	High (+/-3%)	-	-
Sources of measurement uncertainty relate to the energy collection systems in place at the Group companies, the underlying data sets used, and the extrapolation of quarterly figures	High (+/-3%)	Yes	Ongoing development and expansion of data collection and evaluation
Sources of measurement uncertainty relate to the energy and material collection systems in place at the Group companies, the underlying data sets used, and the extrapolation of quarterly figures	High (+/-3%)	Yes	Ongoing development and expansion of data collection and evaluation
No further uncertainty	High (+/-3%)	-	-
Sources of measurement uncertainty relate to the energy collection systems in place at the Group companies and the extrapolation of quarterly figures	High (+/-3%)	-	Ongoing development and expansion of data collection and evaluation
No further uncertainty	High (+/-3%)	-	-

ESRS E2 POLLUTION

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

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Air pollution	● NO _x , SO _x , and dust emissions from our own production processes	In recent decades, voestalpine has implemented measures to significantly reduce air emissions; due to the nature of its production processes and the raw materials used, SO ₂ , NO _x , and dust continue to be emitted

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

E2-1 – Policies related to pollution

Active climate change mitigation—in particular avoiding and mitigating air pollution—has been firmly anchored in voestalpine's corporate principles for decades.

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

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

Impact on strategy and business model	Value chain	Time horizon	Affected stakeholders	Key
Consideration of legal provisions in the strategy and business model	>>>	●●●●	Environment and society	<ul style="list-style-type: none"> ● Actual positive impact ● Actual negative impact ○ Potential positive impact ○ Potential negative impact + Opportunity ! Risk >>> Upstream >>> Own operations >>> Downstream ●○○○ < 1 year ●●○○ 1–5 years ○○●○ 5–10 years ○○○● 10+ years
Adaptation of central production facilities and processes	Group-wide		Local, national, and international authorities	

The environmental management systems define how the respective companies can improve their environmental performance, fulfill legal and other commitments, and achieve local environmental targets. Environmental targets are defined and the necessary action determined and implemented in line with the plan-do-check-act (PDCA) approach, as outlined below:

Plan: Identification and analysis of issues or areas that demonstrate the potential for improvement, target setting, and the development of a detailed implementation plan.

Do: Implementation of necessary actions according to the implementation plan.

Check: Monitoring and assessment of implementation results to determine whether the targets set have been achieved.

Act: Derivation and implementation of further measures based on the results of the review.

Preventing and reducing negative impacts on air, water, and soil quality (e.g., NO_x, SO_x, and dust emissions) is one of the core tasks handled by the environmental management systems in place at voestalpine production companies. One of the main tools employed in this regard is comprehensive pollutant monitoring, which is conducted both in line with and beyond the thresholds of regulatory requirements. This enables process managers to intervene in process management early on in the event of an incident.

Installation set up for preventing and reducing adverse environmental impacts correspond to the current state of the art or meet standards that exceed the current state of the art. Like all process plants, they are inspected and maintained on a regular basis. Periodic inspections are also carried out by the authorities, resulting in adjustments and the development of new plans for minimizing pollutants, if necessary with the involvement of external experts.

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

In order to harmonize and standardize Group-wide environmental management, a Group-wide environmental guideline is currently in the pipeline. Once introduced, the guideline should have an impact on the current decentralized environmental management systems in place at the individual companies and create a common framework for the Group in consideration of the upstream and downstream value chain.

POLICY OVERVIEW

IROs addressed	Policy	Core content	Scope of the policy	Responsibility and monitoring	Other comments
NO _x , SO _x , and dust emissions from our own value-added processes	Environmental management system	<p>Environmental management system in accordance with ISO 14001, EMAS, or equivalent in place at production sites with material environmental impacts from a Group perspective and compared to Group-wide benchmarks, or production sites that make a material contribution to improving Group-wide environmental performance from a Group perspective</p> <p>Determination of how the organization can improve its environmental performance, fulfill its legal commitments, and achieve local environmental targets in line with the PDCA approach</p>	Group manufacturing companies and sites	Management boards of the companies	<p>Regular compliance check as part of the PDCA cycle</p> <p>Engagement of authorities and experts, if necessary direct representatives of neighboring communities</p>

E2-2 – Actions and resources related to pollution

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

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

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

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

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

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

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

» **Process-integrated activities:**

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

» **End-of-pipe technologies:**

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

Detailed lists of the set activities can be found in the locally published environmental statements and elsewhere. The following activities can be cited as examples for the reporting year:

» **voestalpine Stahl GmbH:**

Extensive extraction systems have been installed in the raw material supply area and the casting ladle tilt station of the steel plant to capture and reduce dust emissions.

» **Villares Metals:**

Expansion of the existing dust extraction system to further reduce dust emissions in the steel plant has been implemented.

» **voestalpine Grobblech GmbH:**

Expansion of the water management system with a new downstream cleaning facility to further reduce the total suspended solids in accordance with the new requirements based on best available techniques is currently being implemented.

The following table explores examples of activities related to implementation of the best available techniques and outlines the IROs addressed and further activities.

OVERVIEW OF ACTIONS

IROs addressed	Action	Core content and expected results
NO _x , SO _x , and dust emissions from our own value-added processes	Package of measures to reduce the release of emissions into the air, water, and soil	<p>» Implementation of location-based emission reduction measures</p> <p>» Important matter: implementation of requirements from the BAT process for implementing the best available techniques (valid for sites subject to IED); further regulatory requirements in other countries</p> <p>Expected results: Reduction in the release of emissions into the air, water, and soil</p>

State-of-the-art activity	Emissions/substances	Mitigation activity
Iron and steel manufacturing		
	Air emissions: Dust	<ul style="list-style-type: none"> » Extraction systems for preventing and reducing diffuse dust emissions » Complete encapsulation and containment of plant processes to prevent dust emissions
	Air emissions: NO _x	<ul style="list-style-type: none"> » Exhaust gas recirculation in the sinter plant » Selective catalytic reduction (SCR) to reduce nitrogen oxide emissions
	Air emissions: SO _x (SO ₂)	<ul style="list-style-type: none"> » Desulphurization of coke oven gas » SO₂ reduction by injecting adsorbent in the sinter plant exhaust gas
Metal processing		
	Air emissions: Dust	<ul style="list-style-type: none"> » Extraction systems to catch dust emissions » Dust separation in an electrostatic precipitator or fabric filter
	Air emissions: NO _x	<ul style="list-style-type: none"> » Optimized process control of heating furnaces » Avoidance of false air intake through optimized design of the furnace chambers
	Water emissions: Heavy metals and total suspended solids	<ul style="list-style-type: none"> » Separate collection of different wastewaters » On-site wastewater treatment with neutralization and heavy metal precipitation, as well as sand filter systems
Power plant engineering		
	Air emissions: NO _x	<ul style="list-style-type: none"> » Low-NO_x burner technology » Air staging » Selective catalytic reduction of nitrogen oxides (SCR)
	Air emissions: CO	<ul style="list-style-type: none"> » Optimized process control » LAMBDA air control for complete combustion » Combustion air preheating
	Air emissions: SO _x (SO ₂)	<ul style="list-style-type: none"> » Pre-desulphurization of process gases (coke oven gas)
	Water emissions: Input of pollutants	<ul style="list-style-type: none"> » Separate collection of water and wastewater streams » Dry, water-free waste gas treatment systems

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

Time horizon	Scope of the action	Responsibility and monitoring	Significant expenditure (if relevant)	Other comments
Project-dependent	Own value chain (sites subject to IED or comparable legislation outside the EU)	Management boards of the companies Divisional management (management boards)	CapEx of EUR 27.6 million	Indirect consideration of interests through implementation of regulatory requirements (environment, society)

METRICS AND TARGETS

E2-3 – Targets related to pollution

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

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

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

The emission levels reported by the Group companies refer to the calendar year and are projected over the course of the business year on the basis of forecast values. Due to the fact that plant operating methods remain consistent throughout the year, it can be assumed that the extrapolated figures are highly accurate.

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

OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the metrics used; description of the assumptions and methodology
E2-4 Pollution of air, water, and soil	28a	Emissions released into the air, water, and soil (non-GHG)	Only includes emissions from installations that exceed the thresholds of the European Pollutant Release and Transfer Register (E-PRTR Regulation) Emission levels are based on an evaluation over the course of the CY and monitoring requirements, which are converted to the BY for reference factors

The following table provides an overview of the volumes of pollutants released into the air and water by voestalpine in the business year 2024/25. This marks the first time that this data has been reported in this format and for the new reporting period on the basis of the business year. Consolidated data for earlier periods are not available. Accordingly, no developments or changes over time can be presented in this sustainability statement. However, starting in the new reporting period, any changes in the volumes of pollutants released compared with 2024/25 will be included.

OVERVIEW OF EMISSIONS

in tons	2024/25		
	Air	Water	Soil
Carbon monoxide (CO)	159,089	-	-
Sulfur oxides (SO _x /SO ₂)	5,011	-	-
Nitrogen oxides (NO _x /NO ₂)	4,340	-	-
Particulate matter (PM10)	342	-	-
Methane (CH ₄)	182	-	-
Chlorine and inorganic compounds (as HCl)	20.0	-	-
Lead and lead compounds (Pb)	0.3	0.2	-
Mercury and mercury compounds (Hg)	0.3	0.004	-
Cadmium and cadmium compounds (Cd)	0.03	-	-
Hydrofluorocarbons (HFCs)	35.3	-	-
Chromium and chromium compounds	0.1	1.0	-
Zinc and zinc compounds	5.5	6.9	-
Benzene	5.3	-	-
Polycyclic aromatic hydrocarbons (PAHs)	0.1	-	-
Fluorine and inorganic compounds (as HF)	6.7	-	-
Total nitrogen	-	304	-
Total phosphorus	-	28	-
Nickel and nickel compounds	-	1.1	-
Naphthalene	-	0.01	-
Phenols (as total C)	-	194	-
Total organic carbon (TOC) (as total C or COD/3)	-	432	-
Cyanides (as total CN)	-	0.8	-
Fluorides (as total F)	-	63	-
Arsenic and arsenic compounds	-	0.01	-

Where applicable: description of the sources of measurement uncertainty	Resulting level of accuracy	External validation	Where applicable: measures planned to improve accuracy
Estimate for individual quarters	High (+/-3%)	None	Ongoing development and expansion of data collection and evaluation

ESRS E3 WATER AND MARINE RESOURCES

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

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Water withdrawal	● Water withdrawal	voestalpine extracts significant amounts of cooling water from watercourses for its largest production locations (Linz, Donawitz, Kapfenberg)

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

E3-1 – Policies related to water and marine resources

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

voestalpine's water management activities are based on well-established environmental management systems. Certified environmental management systems (e.g., according to ISO 14001 or EMAS) are rolled out at all major production sites to ensure compliance with local targets (see also E3-3). These incorporate, among others, local water management plans, which are maintained and further developed by specialized environmental departments on an ongoing basis.

Sustainable water management is of central importance both for the stability of existing processes and for ensuring the long-term operational viability of voestalpine's production sites. Group-wide, structured systems and clearly defined processes for responsible water management are in place at

	Impact on strategy and business model	Value chain	Time horizon	Affected stakeholders	Key
	Adaptation of production facilities and processes (if necessary)	>>> Group-wide	●●●●	Local residents, environment Local, national, and international authorities Non-governmental organizations	<ul style="list-style-type: none"> ● Actual positive impact ● Actual negative impact ○ Potential positive impact ○ Potential negative impact + Opportunity ! Risk >>> Upstream >>> Own operations >>> Downstream ●○○○ < 1 year ○●○○ 1–5 years ○○●○ 5–10 years ○○○● 10+ years

site level. All voestalpine production sites are included in reviews of water resources. According to the related findings, there are currently no sites with material water-related impacts in areas of high water stress. For individual, less relevant sites in areas potentially prone to high water stress, which are not currently covered by an environmental management system, plans have been outlined to include these sites in the future and integrate them into the system accordingly.

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

» Local water management plans

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

» Separate water circuits

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

» Comprehensive waste water treatment

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

POLICY OVERVIEW

IROs addressed	Policy	Core content	Scope of the policy	Responsibility and monitoring	Other comments
Water withdrawal	Environmental management system (see E2)	<p>Environmental management system in accordance with ISO 14001, EMAS, or equivalent in place at production sites with material environmental impacts from a Group perspective and compared to Group-wide benchmarks, or production sites that make a material contribution to improving Group-wide environmental performance from a Group perspective</p> <p>Determination of how the organization can improve its environmental performance, fulfill its legal commitments, and achieve local environmental targets in line with the PDCA approach</p>	Group manufacturing companies and sites	Management boards of the companies	<p>Regular compliance check as part of the PDCA cycle</p> <p>Engagement of authorities and experts, if necessary direct representatives of neighboring communities</p>

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

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

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

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

The implementation of the aforementioned ongoing water management activities under the environmental management systems does not require significant operating expenses and/or capital expenditure.

METRICS AND TARGETS

E3-3 – Targets related to water and marine resources

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

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

E3-4 – Water consumption

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

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

OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the metrics used; description of the assumptions and methodology
E3-4 Water consumption	28a	Water consumption	Water consumption figures are based on the water footprint study and have been converted to the BY for reference factors
E3-4 Water consumption	28b	Water consumption in areas of high water stress	Water consumption figures are based on the water footprint study and have been converted to the BY for reference factors
E3-4 Water consumption	28c	Total water recycled and reused	The parameters are based on data collected internally and have been converted to the BY for reference factors
E3-4 Water consumption	29	Water intensity	Calculated on the basis of parameters

OVERVIEW OF WATER CONSUMPTION

	2024/25
Total water consumption (m ³)	15,123,641
Total water consumption in areas exposed to water risk (m ³)	341,916
Total water recycled and reused (m ³)	84,979,662
Total water consumption in own operations (m ³ /EUR million)	961
Net revenue used to calculate total water consumption in own operations: Total net revenue (financial statements) (EUR million)	15,743.7

Water consumption in areas exposed to water risks refer to regions of high water scarcity according to the Aqeduct Water Risk Atlas published by the World Resources Institute. However, the associated water consumption corresponds to only 2% of the total water consumption of the voestalpine Group and is therefore of minor significance.

Where applicable: description of the sources of measurement uncertainty	Resulting level of accuracy	External validation	Where applicable: measures planned to improve accuracy
Measurement uncertainty of monitoring systems and estimate for quarters	High (+/-3%)	None	<ul style="list-style-type: none"> » Ongoing development and expansion of data collection and evaluation » Periodic updates of the water footprint study

ESRS E4 BIODIVERSITY AND ECOSYSTEMS

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

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

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Biodiversity and ecosystems	● Biodiversity in the upstream value chain	Impacts on ecosystems in the upstream value chain (in particular arising from the production of key raw materials such as iron ore and coal)

STRATEGY

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

As part of the materiality assessment, voestalpine looked at the extent to which biodiversity and changes in ecosystems result in impacts, risks, and opportunities for the business model. Material impacts were identified in the upstream value chain, in particular in relation to the extraction of raw materials. By contrast, no impacts on biodiversity or ecosystems were uncovered at voestalpine's own sites, which are mainly located in industrial areas. Likewise, no physical or transition risks were identified that were subsequently analyzed as part of the overall climate risk analysis. The analysis confirmed that the voestalpine business model currently has no direct or material dependence on biodiversity or specific ecosystem services. In light of this, no separate resilience analysis has been carried out to date in relation to biodiversity and ecosystems. More information on the findings from the analysis can be found in chapter ESRS 2 E4 Biodiversity and ecosystems.

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

E4-2 – Policies related to biodiversity and ecosystems

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

Impact on strategy and business model	Value chain	Time horizon	Affected stakeholders	Key
Establishment of sustainable supply chains	>>>	●●●●	Environment	● Actual positive impact
Strategic selection of partners			Suppliers	● Actual negative impact
			Local, national, and international authorities	○ Potential positive impact
				○ Potential negative impact
				+ Opportunity
				! Risk
				>>> Upstream
				>>> Own operations
				>>> Downstream
				●○○○ < 1 year
				○●○○ 1–5 years
				○○●○ 5–10 years
				○○○● 10+ years

At this stage, voestalpine does not have a policy in place for managing impacts on biodiversity and ecosystems in the upstream value chain. A Group-wide approach is currently being developed to systematically take biodiversity aspects into account in the upstream value chain. The development of policies will then be addressed on the basis of this approach.

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

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

General activities

A thorough understanding of suppliers is crucial when it comes to minimizing voestalpine's upstream environmental impacts. In order to systematically document the environmental footprint along the supply chain and to minimize negative impacts on biodiversity and ecosystems in a targeted manner, voestalpine is currently developing a dedicated questionnaire. The questionnaire will be used for the structured collection of relevant information on biodiversity conservation and environmental responsibility in the extraction of raw materials.

Selected suppliers of raw materials are the primary focus of the questionnaire—especially suppliers of raw materials that have a material impact on natural habitats such as ores and coal.

voestalpine aims to gain insights into the environmental practices of its suppliers, to better assess risks and, if necessary, to develop joint measures to improve environmental compatibility.

In addition, voestalpine is currently deliberating adding the topics of biological diversity and conservation to its Code of Conduct for Business Partners with the aim of systematically integrating the responsible use of natural habitats into the supplier management system in the future. As a result, conserving biodiversity will become an integral part of cooperation across the value chain.

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

OVERVIEW OF ACTIONS

IROs addressed	Action	Core content and expected results
Biodiversity in the upstream value chain	Preparation of a supplier questionnaire on biodiversity and ecosystems	<p>Inclusion of the topic of biodiversity and ecosystems in the supplier survey for supplier engagement</p> <p>Expected results:</p> <ul style="list-style-type: none"> » Strengthening of transparency and minimization of risk in the supply chain » Fulfilment of regulatory requirements (e.g., CSDDD)

Site-specific activities

Activities are already being undertaken at various locations to minimize the impact on biodiversity and ecosystems. These activities are identified and implemented in line with legal requirements and in accordance with the principles and requirements of the environmental management systems. Regular reviews are carried out to ensure the implementation and effectiveness of the activities.

In its activities related to biodiversity and ecosystems, voestalpine relies on the expertise of local experts to develop and implement the necessary activities. These experts are engaged whenever specific local or regional knowledge and experience is required to effectively minimize and manage environmental impacts. With this approach, voestalpine ensures that its activities comply with both local conditions and legal requirements. voestalpine does not operate any sites in areas with indigenous populations. Indigenous knowledge is therefore not taken into account in the implementation of its activities.

Time horizon	Scope of the action	Responsibility and monitoring	Significant expenditure (if relevant)	Other comments
Planned from the BY 2025/26 onwards	Selected raw material suppliers	Head of the Corporate Sustainability Department & Head of the Group Procurement Department	–	If necessary, division of Group targets based on actions after initial evaluation

METRICS AND TARGETS

E4-4 – Targets related to biodiversity and ecosystems

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

ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY

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

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

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

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Circular economy	● Metal recycling—using scrap as a resource	voestalpine contributes to metal recycling and the circular economy by recovering and reusing metals from various sources such as scrap, slag, dust, and residues. It also manufactures high quality and durable metal products that can be recycled at the end of their life cycle
	● Business models for recycling	Helping customers increase their recycling rate by implementing circular economy contracts (e.g., recycling contracts)
	● Waste recovery—use of by-products within voestalpine or selling them to other industries	Recycling of residues from the refining process (e.g., ferrous material flows), overall increase in resource utilization at voestalpine, reduction in waste at voestalpine, and primary resource requirements in other industries

Impact on strategy and business model	Value chain	Time horizon	Affected stakeholders
Adaptation of processes and the value chain	>>>	●●●●	Environment Internal departments (e.g., Procurement)
Establishment of cooperation partnerships Strengthens innovative strength	>>>	○●●●	Customers Suppliers Industrial associations
Adaptation of processes and the value chain Development of new business models	>>>	●●●●	Customers Industrial associations

Key

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

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

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

Circular economy policy

This circular economy policy takes into account the external requirements of customers, markets, regulatory frameworks, and society, as well as the challenges posed by a volatile commodity and energy market. It also sets forth internal priorities to ensure the economic and sustainable use of resources.

voestalpine's circular economy policy revolves around several strategic priorities:

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

Progress is currently being made on upgrading the existing circular economy policy into a Group-wide circular economy strategy that defines strategic targets and measures for material cycles and resource efficiency. Quantitative targets such as recycling rates, zero-waste targets, and energy consumption will be set and strategic initiatives defined in the new strategy.

As an essential component of the Group-wide circular economy strategy that remains to be developed, voestalpine has already implemented activities for the recycling of material flows and has developed a comprehensive waste management policy. These initiatives will form the basis for the future strategic orientation and advancement of the Group's circular economy.

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

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

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

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

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

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

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

Environmental management systems

The circular economy, sustainable sourcing, and resource-efficient products and services constitute key elements of voestalpine's sustainability strategy. Work on these topics is supported by ISO 14001 or EMAS environmental management systems (see E2-1). A corresponding environmental management system is already in place at the majority of companies that have a significant impact on the environment from a Group perspective. At present, this covers 86% of the manufacturing companies responsible for 98% of voestalpine's production volume.

Business models for recycling

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

In terms of the circular economy, HPM focuses on material and scrap cycles, alternative sources of raw materials, recycling by-products, and zero waste. The Climate Impact unit focuses on decarbonization, environmentally-friendly energy, and energy efficiency. The social commitment of the division is reinforced under Social Impact, while sustainability competencies of employees are systematically improved under the Sustainable Sourcing field of action. Here, the focus is on providing transparency with regard to raw materials and procurement in general as well as reducing emissions.

Sustainable procurement

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

In concrete terms, this involves:

- » Supplier assessments and on-site audits to ensure compliance with sustainability criteria
- » A revised Code of Conduct for Business Partners that contains specific requirements for sustainable procurement and was adopted by the Management Board of voestalpine in 2023
- » Ongoing raising of awareness among global business partners with regard to sustainability targets and requirements for transparency in the supply chain

More information on the Procurement Policy can be found in chapter S2-1 Policies related to value chain workers.

Innovation, research, and development

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

POLICY OVERVIEW

IROs addressed	Policy	Core content	Scope of the policy	Responsibility and monitoring	Other comments
All IRO E5	Circular economy policy	<p>Implementation of the circular economy principles (10R) in the Group</p> <p>Strategic priorities: improving environmental performance through a more sustainable process chain, ensuring the long-term supply of raw materials, and reducing dependency on individual countries, supporting the achievement of voestalpine's sustainability targets, and increasing the security of supply for customers, exploiting economic potential and new business opportunities in the field of the circular economy</p>	<p>Own operations to a partial extent</p> <p>Upstream and downstream value chain to a partial extent</p>	Management boards of the divisions	» Consider external requirements of customers, markets, regulators, and society
All IRO E5	Environmental management system (see E2)	<p>Environmental management system in accordance with ISO 14001, EMAS, or equivalent in place at production sites with material environmental impacts from a Group perspective and compared to Group-wide benchmarks, or production sites that make a material contribution to improving Group-wide environmental performance from a Group perspective</p> <p>Determination of how the organization can improve its environmental performance, fulfill its legal commitments, and achieve local environmental targets in line with the PDCA approach</p>	Group manufacturing companies and sites	Management boards of the companies	<p>» Regular compliance check as part of the PDCA cycle</p> <p>» Engage authorities and experts, if necessary direct representatives of neighboring communities</p>
All IRO E5	InSPire policy (HPM)	<p>Framework sustainability policy designed to integrate all sustainability pillars into daily activities to ensure lasting performance for current and future generations</p> <p>Key building blocks: circular economy, climate impact, sustainable sourcing, social impact, and sustainable business</p>	<p>High Performance Metals Division</p> <p>Upstream and downstream value chain to a partial extent</p>	Managers in charge of InSPire	–
All IRO E5	Procurement policy	<p>Provides the binding framework conditions for procurement and general regulation of the requirements and procedures in procurement</p> <p>Includes principles for sustainable procurement</p>	<p>Complete coverage of the upstream value chain</p> <p>Partial coverage of own operations</p> <p>Partial coverage of the downstream value chain (excl. use and self-pickup)</p>	Procurement board	<p>» Consider stakeholder analysis in policy</p> <p>» Communication to procurement@voestalpine.com</p>

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

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

Priorities for action

voestalpine has modeled its circular economy policy on the ten principles of circular economy (10R), with three main areas of focus—narrowing the loop, slowing the loop, and closing the loop.

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

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

OVERVIEW OF ACTIONS

IROs addressed	Action	Core content and expected results
All IRO E5	Metal recycling—using scrap as a resource	<p>Reprocessing and reuse of internal process scrap and external pre- and post-consumer scrap</p> <p>Reintroduction of scrap, including rail scrap, to production</p> <p>Expansion of closed scrap cycles to increase the use of secondary raw materials</p> <p>Increase in the use of internally generated and external scrap in steel production</p> <p>Expected results:</p> <ul style="list-style-type: none">» Reduction in primary raw material requirements» Increased resource efficiency and promotion of circular economy» Optimized material use and minimized waste
All IRO E5	Package of stakeholder engagement measures	<p>Project to increase circular economy, zero-waste activities, energy recovery, and efficiency as well as the use of renewable energy and alternatives to natural gas</p> <p>Expected results:</p> <ul style="list-style-type: none">» Reduction in waste and increased circular economy» Reduction in energy consumption and GHG emissions

Below you can find examples of action taken by voestalpine:

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

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

Time horizon	Scope of the action	Responsibility and monitoring	Significant expenditure (if relevant)	Other comments
By 2030 depending on project	Entire upstream value chain	Management boards of the divisions	The means of achieving this initiative are accounted for in the greentec steel program and are included in E1 as part of the Climate Transition Plan	<ul style="list-style-type: none"> » Stakeholder consideration through extensive adaptation of the business model to maximize the circular economy » Active collaboration with customers with regard to circular economy agreements
Up to 2030	Own operations Covered by the upstream and downstream value chain to a partial extent	Managers in charge of InSPire	–	–

METRICS AND TARGETS

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

The voestalpine Group has set itself the voluntary target of increasing the use of scrap in crude steel production by 50% in its own operations by 2030. The aim is to increase the use of secondary raw materials and reduce the reliance on primary raw materials. This target falls under the third of the five stages of waste hierarchy under the EU Waste Framework Directive (2008/98/EC), namely recycling, as scrap is recycled as a raw material and reintroduced into the production loop.

As the increased use of secondary raw materials optimizes the efficiency of the material cycle and reduces waste generation, this target is directly linked to improving the circular material use rate. Focusing on recycling scrap is crucial when it comes to reducing the use of resources and promoting a circular economy.

Another contribution to the achievement of this target is the planned technological transformation over the course of decarbonization, which requires a fundamental adaptation of the materials and circular economy, in particular through the increased use of secondary raw materials.

Specific methodologies and assumptions based on internal analyses and scientific evidence related to the voestalpine greentec steel program were used to define the objectives. Along with other factors, these include the interaction between the circular economy and GHG emissions, and the availability and quality of scrap as a secondary raw material. Significant assumptions have also been made with regard to technological advancements and the market availability of scrap, which are accounted for in the set targets. A stakeholder process was taken into account as part of the target setting process.

The plan to increase the use of scrap will be reviewed at specified intervals to ensure that progress is being made in line with the envisaged targets. Progress monitoring includes the identification and reporting of the scrap used in crude steel production on a regular basis.

Circular systems were rolled out at the sites with integrated steel mills in Linz and Donawitz. These systems make it possible to recover, treat, and reuse valuable materials so that the material streams can be returned to the processes.

The planned technological transformation over the course of decarbonization requires a fundamental adaptation of the materials and circular economy. One of the important aspects of this transition lies in increasing the use of secondary raw materials.

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

TARGET: USE OF SCRAP IN CRUDE STEEL PRODUCTION

KPI	Scrap use		
UNIT	% in scrap use		
BASE VALUE	▶	STATUS	TARGET VALUE
2.25 million t Calendar year 2023		+0.3% Business year 2024/25	+50% Business year 2029/30
Responsibility and monitoring	Management boards of the divisions		
Scope	Own operations; Upstream and downstream value chain to a partial extent		
Stakeholders	Customers, state, authorities, shareholders, society		
IROs addressed	All IROs from E5		
Reference to policy	All policies from E5		

E5-4 – Resource inflows

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

Raw material:

Iron ore

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

Coking coal

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

Steel scrap

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

Alloys

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

Water

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

voestalpine's RESOURCE INFLOWS

	2024/25
Overall total weight of products and technical and biological materials used (t)	10,370,906
Percentage of biological materials (%)	0
Overall total weight of secondary reused or recycled components, secondary intermediary products, and secondary materials used to manufacture the company's products and services (t)	1,162,539
Percentage of materials reused for manufacturing (%)	11

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

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

E5-5 – Resource outflows

Products and materials

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

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

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

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

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

Waste

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

Typical waste streams in the iron and steel sector:

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

At Group level, a survey of all metrics relevant to the environment takes place on an annual basis on an online reporting system. Waste-specific data is collected by local experts, and entries are made in accordance with national requirements and definitions of waste types. The majority of the reported waste generation is based on direct volume measurements, which are also required by local regulations.

RESOURCE OUTFLOWS 2024/25

In tons	Hazardous waste	Non-hazardous waste
Waste diverted from disposal (re-use)		
Treated for re-use	5,019	15,237
Recycling	7,027	106,661
Other recovery processes	88,341	639,967
Total	100,387	761,865
Waste disposed of		
Incinerated	2,804	4,552
Landfill	12,153	100,146
Other form of disposal	78,526	350,511
Total	93,483	455,209
Total amount of waste generated	193,870	1,217,074
Share of non-recycled waste (in %)	48	37
Of which radioactive waste	0	–

OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the metrics used; description of the assumptions and methodology
E5-4 Resource inflows	31c	Weight of reused or recycled secondary components, intermediary products, and materials (including packaging)	The parameters are based on data collected internally and have been converted to the BY for reference factors
E5-5 Resource outflows	37a	Total amount of waste generated	
E5-4 Resource inflows	31b–c	Biogenic and recycling content of resource inflows	
E5-4 Resource inflows	31a	Material input	
E5-5 Resource outflows	36a	Product longevity	
E5-5 Resource outflows	36c	Recyclable content	

Where applicable: description of the sources of measurement uncertainty	Resulting level of accuracy	External validation	Where applicable: measures planned to improve accuracy
Measurement uncertainty of internal data collection systems and estimate for quarters	High (+/-3%)	None	Ongoing development and expansion of data collection and evaluation

I,R&D INNOVATION, RESEARCH, AND DEVELOPMENT

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Innovation, research, and development	● Production innovations	voestalpine invests in research and development to create new processes, technologies, and products to promote the sustainability and provision of innovative products and materials (including hydrogen-based steel production and carbon capture, storage, and utilization technologies), e.g., through the use of hydrogen, plasma technology, and similar technologies as part of the greentec steel program
	+ USP based on product differentiation	Successful product innovation can strengthen voestalpine's market position and financial performance with measures such as obtaining certification for low-carbon or zero-carbon steel from individual locations (compared to mass balance approach)
	+ Increasing recycling efficiency through technological innovation	Introducing innovative technologies into the recycling process could increase efficiency and further improve the recycling rate in order to achieve cost savings
	+ Breakthrough technology applications (e.g., HYFOR)	Successful application of SuSteel and/or HYFOR technologies to maintain high product quality (vs. use of EAF technology)
	! Ensuring product quality with increased use of scrap	Risk of declining product quality due to higher use of scrap (BF-BOF vs. EAF route)

	Impact on strategy and business model	Value chain	Time horizon	Affected stakeholders
	Adaptation of central production facilities, technologies, and processes Strengthens innovative strength Extensive adaptation of the business model	>>>	●●●●	» Educational institutions and research » Customers
	Transformation of the product portfolio Strengthens innovative strength	>>>	○●●●	» Educational institutions and research » Customers
	Adaptation of central production technologies as well as the value chain and processes Strengthens innovative strength	>>>	○●●●	» Educational institutions and research » Customers
	Adaptation of central production technologies as well as the value chain and processes Strengthens innovative strength	>>>	○●●●	» Educational institutions and research » Customers
	Adaptation of key production facilities and technologies, as well as the value chain and processes Continuous risk management	>>>	○●●●	» Customers

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

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

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

As key elements of voestalpine's strategy, Research and Development (R&D) and Innovation make a significant contribution to the company's position as a leader in innovation, technology, and quality. The R&D strategies aim to ensure the long-term economic success of the company through innovative processes and sustainable products.

voestalpine's decentralized R&D organization is underpinned by strategic innovation guidelines, a defined innovation process, and the alignment of research projects with the phased implementation of CO₂ emission reduction technologies to achieve net-zero CO₂ by 2050. As research cannot be considered in isolation, no measurable and specific outcome-oriented targets have been set for research and development at this stage (see chapter I,R&D-3 Targets related to innovation, research, and development). A comprehensive realignment of the R&D strategy is planned from the business year 2025/26.

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

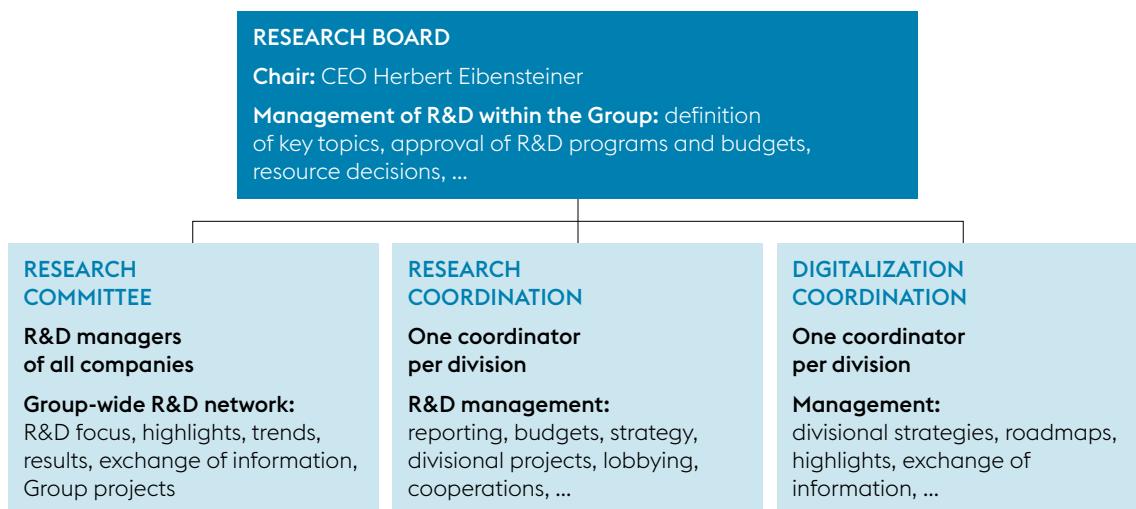
Organization of innovation, research, and development at the voestalpine Group

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

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

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

R&D IN THE voestalpine GROUP



The decentralized organization of research activity in the voestalpine Group makes a significant contribution to strengthening USPs through product differentiation. Each research site has specific core competencies, which enables a diverse product range. In addition, the pooling of expert knowledge at selected locations promotes the development of production innovations that are geared toward a sustainable society.

Strategic innovation guidelines

voestalpine's R&D strategy is derived directly from the Group strategy. The following six Strategic Innovation Guidelines underline the importance of R&D in the company and its contribution to the sustainable and successful development of voestalpine:

1. From the idea to implementation—working together for success

Research activities are subject to a standardized and cross-departmental innovation process and managed using transparent innovation roadmaps, more information on which can be found under "Prioritized innovation roadmaps." The highest priority is given to the Group's key issues and the needs of customers.

2. Fostering the best ideas and creating USPs along the value chain

By creating unique selling points, not only does voestalpine increase its own competitiveness, but also that of its customers. Specific projects are prioritized and allocated the appropriate resources. Each project is analyzed transparently to determine the benefits it brings and projects with little promise are canceled.

3. R&D projects aim to achieve sustainability

The sustainability of research projects is accounted for throughout the value chain—starting with the (secondary) raw materials, the production processes in the company, and further processing by customers through to use by end consumers. The main focus is placed on energy and resource efficiency as well as saving greenhouse gases.

4. Active know-how management, both internally and externally, is the key to success

The protection of important know-how against external misuse is achieved, among others, through active patent management. Synergies are created and used within the company through Group-wide knowledge sharing.

5. Decentralized R&D forms a global voestalpine network

In the voestalpine Group, more than 70 locations are involved in research and development. Decentralized R&D locations allow us to maintain proximity to our customers and local production. Research projects are centrally managed from our headquarters in Linz. This central organization ensures equipment and resources are allocated according to requirements, coordinates cooperation, and optimally utilizes synergies within the Group. Numerous partnerships with universities, colleges of applied sciences, and centers of expertise constitute an important supplement to internal R&D network.

6. Obtaining the best researchers for voestalpine

Employees are key to the success of R&D and innovation. Targeted training measures are employed to promote their individual strengths and interests. Actively engaging with young talent at schools and universities strengthens our future employees early on.

The strategic innovation guidelines, in particular the first three, focus in particular on product innovation to achieve a sustainable society and the creation of USPs through product differentiation. When formulating the guidelines, the interests of various stakeholders, including customers, employees, and applicants, as well as the Management and Supervisory Board, were taken into account through measures such as dialogues, cooperation, and events.

Prioritized innovation roadmaps

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

Preparation of the prioritized innovation roadmaps falls under the responsibility of the R&D coordinator of each division. Once complete, the roadmaps are coordinated with the members of the Management Board in charge of the divisions on the divisional boards. This is followed by annual approval

by the Group Management Board in the research board. The prioritized innovation roadmaps—available for all companies that engage in R&D in the individual divisions—aim to define medium and long-term innovation priorities in terms of product and process development and to provide the necessary resources (see IROs of production innovations). With this, voestalpine is able to help shape new market trends and establish successful product innovations (see IROs of USP through product differentiation). The roadmaps take into account the needs of customers and markets along with any new legal requirements and standards.

R&D strategy for modular implementation of new technologies to achieve decarbonization targets

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

- » In the first stage, the existing blast furnace processes are optimized to minimize CO₂ emissions and to ensure the efficient use of by-products
- » Progress is made on the electrification of processes in the first expansion step. Intensive research activities are required to facilitate the commissioning and successful operation of the electric arc furnaces at the sites in Linz and Donawitz. These activities include test melts, the development of alloy concepts as well as simulations and modeling. Research is focused on upholding our ability to continue producing the highest quality steel grades even after the process route has been changed in order to counteract the risk of decreasing product quality due to a higher use of scrap material in the EAF route. Due to increasing demand for scrap metal, research is needed to make the most efficient use of available resources and to tap into new sources, such as post-consumer scrap, for example through closed loops with customers
- » In order to achieve the net-zero CO₂ target by 2050, new technologies must be developed and brought to market in addition to electric arc furnaces. These breakthrough technologies include SuSteel (Sustainable Steelmaking) and HYFOR (hydrogen-based fine-core reduction), which are already delivering initial results on a pilot scale. The further development and especially the implementation of these methods are research and resource intensive, requiring comprehensive basic research

This research strategy takes into account the interests of management, legislators, customers, and residents near the location and in communities neighboring the steel-producing companies, whose emissions are gradually reduced as a result.

POLICY OVERVIEW

IROs addressed	Policy	Core content	Scope of the policy	Responsibility and monitoring	Other comments
Production innovations	Strategic innovation guidelines	Description of the orientation of research and development activities within the voestalpine Group, including the areas of active know-how management (internal and external), the organizational structure of R&D (central management and decentralized R&D departments), and sustainability in individual projects	Own operations	Head of Group-wide Research & Development and Innovation	» The interests of customers, research institutions, employees, and candidates are taken into account
USP based on product differences			Downstream value chain to a partial extent (in line with customer requirements)		
Increased recycling efficiency through technological innovation	Prioritized innovation roadmaps of the divisions	Summaries of R&D activities are translated into prioritized innovation roadmaps, whereby topics in the development pipeline are considered at the project/program level with a future time horizon of 10 – 15 years	Own operations to a partial extent	R&D coordinator of the divisions	» The interests of customers, research institutions, universities, and management are taken into account » External communication, e.g., at presentations
			Downstream value chain to a partial extent (customer innovations)	Approval in the annual research board under the leadership of the CEO	
Applications of breakthrough technologies (e.g., HYFOR)	R&D for modular implementation of new technologies to achieve net-zero by 2050	Support for the Group-wide decarbonization strategy through a phased approach to achieving net-zero by 2050	Own operations	Project managers of R&D sub-projects	» The interests of customers, legislators, neighbors and neighboring communities, and management are taken into account » External communication, e.g., at presentations or through Group-wide communication on decarbonization
Ensuring product quality with increased use of scrap		Steps include research initiatives to electrify processes (e.g., through EAF), development of breakthrough technologies such as SuSteel and HYFOR, and ensuring product quality	Downstream value chain to a partial extent (in line with customer requirements)	Approval in the annual research board under the leadership of the CEO	

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

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

Due to their high strategic relevance, two of these actions are also being managed as Group projects. In addition to individual projects, which are usually handled by a team of researchers who are assigned to a company or business unit in organizational terms, division-wide competencies are pooled

in Group projects. Group projects address strategically important issues and are associated with high project costs and a higher project risk. This targeted cooperation accelerates implementation, thereby increasing efficiency. The following Group-wide R&D projects were undertaken in the business year 2024/25:

- » Sustainable processes (project duration November 1, 2021 to October 31, 2024)
- » Sustainable products (project duration December 1, 2022 to November 30, 2025)
- » Simulation of complex (supply chain) networks (project duration April 1, 2024 to March 31, 2028)

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

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

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

The actions and packages of actions are explained in detail below and are discussed with regard to impacts, risks, and opportunities. The stated R&D expenses are solely OpEx costs and the implementation of the projects is not subject to any preconditions. A total of EUR 19.36 million was spent on the R&D projects in the past business year as a result of the actions listed above. This corresponds to 8.85% of total gross R&D expenditure. Similar levels of expenditure are also planned for the upcoming business year to ensure the ongoing implementation of planned projects.

R&D for sustainable products and Group project “Sustainable Products”

The Group project “Sustainable Products,” which was launched on December 1, 2022 and is scheduled to run for three years, contains 22 sub-projects focused on energy and mobility, products for agriculture and the food industry, and aspects to optimize products in the use phase. A total of 25 Group companies from all divisions are involved in the implementation of this action. Overall project management and coordination falls under the remit of the Metal Forming Division, which is also the division most involved in the sub-projects. By pooling expertise, sustainable products can be brought to market in a relatively short period of time and generate sales within a few years. Examples of sub-projects include the development of complete process chains for high-quality tool repair, on which researchers from the High Performance Metals Division are working, and the further development of fences for wildlife protection in the Metal Forming Division. A budget of EUR 33.7 million will be made available over the entire duration of the project. The R&D expenditure for all sub-projects came to EUR 8.40 million in the business year 2024/25.

R&D for greentec steel—experimental melting, dynamic alloying, and active interventions in production processes

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

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

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

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

ii) Dynamic alloying (Metal Engineering and Steel Division)

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

iii) Forecast-driven process adjustments (Steel Division)

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

Since 2021, the transition of the production routes on electric arc furnaces in Linz and Donawitz has been accompanied by intensive research. By the time the first electric arc furnaces are commissioned in 2027, the first intensive phase of R&D is scheduled to be completed. However, research activities to maintain product properties will continue in the years that follow.

The package of actions mitigates the risk of decreasing product quality due to the transition from the blast furnace route to the electric arc furnace route. The described R&D activities can minimize this risk, which is based on physical/chemical principles. The ability to react rapidly to the composition of input materials, in particular the proportion of accompanying elements in scrap, also improves recycling efficiency through technological innovation. A total of EUR 9.26 million was spent on the individual R&D projects for this key research focus in the past business year. After completion of the preliminary work in the first year of the project, higher R&D expenses have been earmarked for the upcoming years.

Simulation of complex networks and post-consumer scrap

Scrap is already playing an essential role at voestalpine's production sites. Due to the limited availability of high-quality steel scrap on the world market, research activities are necessary both to increase the efficiency of recycling processes, especially for old scrap, and to venture into new scrap markets. In particular, the conversion of process routes from blast furnaces to electric arc furnaces is accompanied by a sharp increase in scrap demand. The objectives of the "Simulation of complex networks" action, which is being implemented as part of a Group project since 2024, are to understand and visualize the supply chains relevant to the voestalpine Group, to simulate and optimize the flow of scrap as well as to simulate worst-case scenarios and develop remedies. The duration of the project is four years and EUR 0.22 million was spent on it in the business year just ended.

In other individual projects, the voestalpine experts are intensively researching the treatment and use of scrap, otherwise known as post-consumer scrap. Compared to new scrap, which is produced as waste during punching, for example, the use of post-consumer scrap, which is often mixed with other materials, can present a number of challenges. Composite materials and other non-metallic components need to be separated in a complex process before further processing. The KIRAMET project (artificial intelligence-based recycling of metal composite waste), for example, involves working with partners from academia and industry on AI-based solutions for processing these material flows. During the project period from 2023 to 2026, the aim is not only to increase the value added of secondary raw materials; networking between industrial companies will also enable holistic management of the recycling chain. In another flagship project, voestalpine is cooperating with a recycling company and a premium car manufacturer to close the loop for material cycles between the stakeholders.

Application of SuSteel technology and operation of the SuSteel pilot plant in Donawitz

Another trial project is currently being undertaken in the SuSteel (sustainable steel) test plant at the voestalpine Stahl Donawitz GmbH site: the production of crude steel using hydrogen plasma in a single process step. In this CO₂-free method, in which only steam is produced as a by-product, the intermediate stage of pig iron can be completely bypassed. In addition to voestalpine Stahl GmbH and voestalpine Stahl Donawitz GmbH, two long-term academic cooperation partners, namely K1-MET and the University of Leoben, are also involved in the implementation of this project.

In the past business year, R&D expenses of EUR 0.89 million were incurred for individual projects related to SuSteel technology. The SuSteel test plant, which has been successfully operating since 2021, demonstrates that the single-stage reduction of iron ores using hydrogen is an important alternative to fossil-based reducing agents such as coke, coal, or natural gas. The experimental findings on this breakthrough technology will also be of great importance, especially in the third stage of the successively implemented decarbonization plan to achieve net-zero CO₂ by 2050. The package of actions is based entirely on the IRO for the application of the HYFOR and SuSteel technology.

Application of HYFOR technology and operation of the HYFOR pilot plant in Donawitz

A HYFOR pilot plant is being operated at the voestalpine Stahl Donawitz GmbH site in partnership with partners from the worlds of industry and academia. HYFOR technology (hydrogen-based fine-ore reduction) enables the direct reduction of ultrafine ores using hydrogen without prior sintering or pelleting. This technology and the knowledge gained from the pilot trials will make it possible to process ultrafine ores primarily available on the world market. In a first step, hydrogen-reduced material from the HYFOR test facility was melted down together with scrap in a trial melt at the "Technikum Metallurgie," a metallurgy technical center, and a low-CO₂ bearing steel was produced that met the required quality standards. This demonstrated that it is possible to produce the same steel grades produced using conventional routes in this manner.

Accompanying this pilot plant, several individual R&D projects were carried out to create a database that can be used for later expansion into an industrial plant. In the business year 2024/25, the cumulative R&D expenses for these individual projects amounted to EUR 0.59 million. The R&D pilot HYFOR plant went into operation in 2021 and has been running successfully ever since. The findings obtained can be used to provide extensive scientific fundamental knowledge, in particular in the planned phase 3 of the modular implementation of R&D to achieve net-zero CO₂ by 2050. Starting in fall 2025, the world's first demonstration plant will be built at the voestalpine Stahl GmbH site in Linz. The plant will be able to combine hydrogen-based direct reduction for ultrafine iron ores using HYFOR technology with an electric melting process. This expansion step will result in a significant increase in R&D expenditure for this set of actions.

OVERVIEW OF ACTIONS

IROs addressed	Action	Core content and expected results
Production innovations USP based on product differences	Package of actions: R&D for sustainable products and Group project "Sustainable Products"	22 sub-projects on the focus topics of energy and mobility, as well as products for agriculture and food and aspects relating to the use phase Expected result: Development of sustainable products to achieve net-zero
Ensuring product quality with increased use of scrap	Package of actions: R&D for EAF/greentec steel: dynamic alloying, active interventions in the production process, and experimental melting	Research activities to ensure product quality after transition to EAFs Optimization of product properties in scrap through dynamic alloying Influencing of material properties by adjusting the process parameters, especially during annealing Targeted production of melts with defined composition to investigate physical and chemical properties and derive optimization actions
Increasing recycling efficiency through technological innovation	R&D Group project "Simulation of complex networks" and the use of post-consumer scrap	Build understanding and visualization of voestalpine-relevant supply chains, simulate and optimize scrap flow, simulate worst-case scenarios, and generate remedies Treatment and use of post-consumer scrap (old scrap)
Applications of breakthrough technologies (e.g., HYFOR)	Package of actions: Application of SuSteel technology and operation of the SuSteel pilot plant in Donawitz Package of actions: Application of HYFOR technology and operation of the HYFOR pilot plant in Donawitz	Research on the CO ₂ -free production of crude steel in one process step using novel hydrogen plasma technology (Project SuSteel—Sustainable Steelmaking) at a pilot plant Implementation of the package of actions in partnership with scientific cooperation partners Research on HYFOR technology (hydrogen-based fine-ore reduction) at the pilot plant enables the direct reduction of ultrafine ores using hydrogen without prior sintering or pelleting Implementation of the package of actions in partnership with scientific cooperation partners

	Time horizon	Scope of the action	Responsibility and monitoring	Significant expenditure (if relevant)	Other comments
	December 2022 – November 2025	Own operations to a partial extent	Project managers of R&D sub-projects Management of Group project at MFD	EUR 8.40 million OpEx (Group project)	» Inclusion of customer interests
		Downstream value chain to a partial extent	Progress monitoring in line with the voestalpine standard		
	2021 – 2027 (Phase 1)	Own operations to a partial extent	Project managers of R&D sub-projects Managers responsible for R&D MED & SD	EUR 9.26 million OpEx	» Inclusion of the interests of customers and legislators
		Downstream value chain to a partial extent	Progress monitoring in line with the voestalpine standard		
	April 2024 – March 2028	Own operations to a partial extent	Group project management by divisional logistics management (SD) Project managers of R&D sub-projects	EUR 0.22 million OpEx (Group project)	» Inclusion of the interests of customers, suppliers, research institutions, and universities
		Upstream and downstream value chain to a partial extent	Progress monitoring in line with the voestalpine standard		
	Ongoing; Application particularly during Phase 3 of the Climate Transition Plan	Own operations to a partial extent	Project managers of R&D sub-projects Progress monitoring in line with the voestalpine standard	EUR 0.59 million OpEx	» Inclusion of the interests of customers, research institutions, and universities
	Ongoing; Application particularly during Phase 3 of the Climate Transition Plan	Own operations to a partial extent	Project managers of R&D sub-projects Progress monitoring in line with the voestalpine standard	EUR 0.89 million OpEx	» Inclusion of the interests of customers, research institutions, and universities

METRICS AND TARGETS

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

In light of its overarching role within the voestalpine Group, research and development forms a link between Group-wide sustainability goals and process and product innovations. The findings from numerous R&D related actions not only affect quantifiable targets, but must also be considered in the context of manufacturing processes. Process innovations in relation to the green transformation contribute significantly to reducing CO₂ emissions; but the savings cannot be attributed exclusively to R&D. Success in setting up and further developing the circular economy at all voestalpine locations largely depends on progress in research and development. As it is not possible to view research as an isolated factor, no R&D-specific measurable and outcome-oriented targets have currently been defined. In the framework of the strategic process in the business year 2025/26, the definition of strategic targets for research and development is planned.

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

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

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

The high number of employees in R&D is accompanied by high R&D expenditure (gross). In the business year 2024/25, EUR 218.89 million was spent on research and development activities, reinforcing the key role of these activities in the business model of the voestalpine Group. A significant proportion of R&D expenditure is invested in projects that increase the sustainability of voestalpine processes and products in the long term. A budget of EUR 241.27 million has been earmarked for R&D for the business year 2025/26.

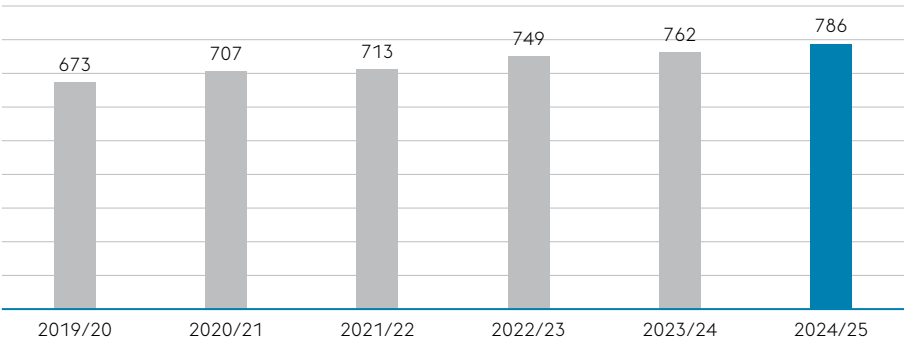
The entire R&D expense (gross) is calculated as the total R&D expenses (gross) of all companies active in R&D. R&D expenditure (gross) includes all expenses (directly attributable costs excluding VAT) for all R&D activities in the business year, which can be undertaken as part of the R&D program, regardless of whether they are carried out in the dedicated R&D departments or in other areas. These include

personnel costs (salaries) and direct expenses for R&D (such as material costs, travel costs, use of infrastructure, and third party costs). Depreciation on fixed assets and patent application and maintenance costs are not included.

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

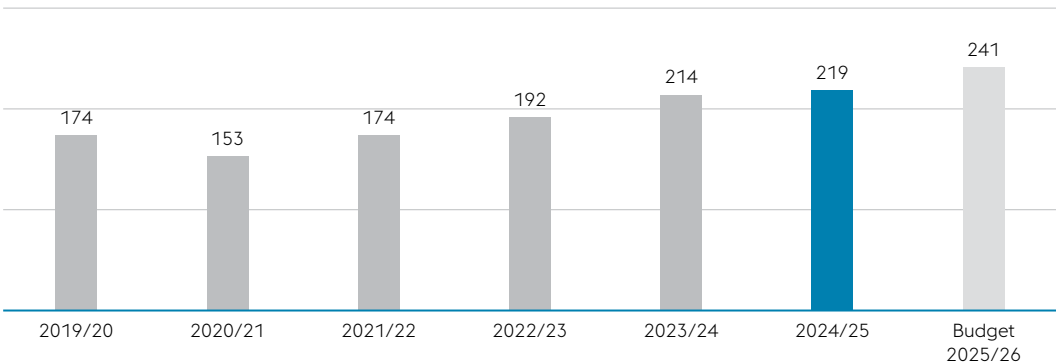
NUMBER OF EMPLOYEES IN RESEARCH AND DEVELOPMENT

Headcount, as of the March 31, 2025 reporting date



EXPENDITURE FOR RESEARCH AND DEVELOPMENT

In millions of euros



OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the metrics used; description of the assumptions and methodology
I,R&D (company-specific topic)	–	R&D expense (gross)	Total R&D expenses (gross) of all companies active in R&D. R&D expenditure (gross) includes all expenses (directly attributable costs excluding VAT) for all R&D activities in the BY, which can be undertaken as part of the R&D program, regardless of whether they are carried out in the dedicated R&D departments or in other areas
I,R&D (company-specific topic)	–	Number of employees in R&D	The number of employees in R&D corresponds to the total number of employees (headcount) who are directly assigned to the R&D departments of the individual Group companies

Where applicable: description of the sources of measurement uncertainty	Resulting level of accuracy	External validation	Where applicable: measures planned to improve accuracy
Limited—data represents the individual companies	High	No	–
Limited—data represents the individual companies	High	No	–

SOCIAL INFORMATION

ESRS S1 OWN WORKFORCE

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

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Working conditions	● Respect for human rights and fair working conditions at voestalpine	voestalpine ensures fair working conditions with respect for human rights for all of its employees, thereby promoting their satisfaction and sense of safety voestalpine offers fair and competitive pay and benefits, flexible working arrangements, social dialogue with an employee shareholding scheme, and a fair grievance mechanism to promote employee satisfaction
Secure employment	○ Economic crisis or restructuring	Economic crises or restructuring at voestalpine can negatively impact employees by creating job insecurity. In addition, cuts in working hours and salaries in the event of crises can place a financial burden on employees

	Impact on strategy and business model	Value chain	Time horizon	Affected stakeholders
	<p>Ensures ethical standards</p> <p>Strengthens the employer brand</p> <p>Improves employee retention</p>	<p>>>> Group-wide</p>	<p>●●●●</p>	<p>Employees and non-employees</p> <p>NGOs and NPOs</p>
	<p>Strategic retraining of employees</p> <p>Minimizes disruptions to operations</p> <p>Counteracting reputational damage</p>	<p>>>> Group-wide</p>	<p>●●●●</p>	<p>Employees</p> <p>Special interest and advocacy groups</p>

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Health and safety	● Healthy and safe working conditions at voestalpine	voestalpine prioritizes the safety and health of its workforce by implementing a comprehensive occupational health and safety management system as well as providing periodic training and awareness-raising activities to improve employee wellbeing and satisfaction. Regular training and awareness-raising activities help to ensure that workers are better informed and prepared to avoid risks, which in turn helps to improve their safety and health at work
	● Accidents at work, injuries, and occupational illnesses (health and safety)	voestalpine employees may be exposed to occupational hazards and risks such as accidents, injuries, illnesses, or diseases due to the sector in which they work, the nature of their job, or their work environment
Equal treatment and opportunities for all	● Equal opportunities for all employees	voestalpine promotes equal opportunities for all employees by reinforcing a culture of diversity, inclusion, and anti-discrimination. In addition, voestalpine supports the professional development and career advancement of its employees—regardless of gender, age, ethnic background, disability, or other traits
Training and skills development	● Personal development and training	In addition to the basic training, many different continuing education programs are offered to promote the professional and personal development of all employees (educational programs provided by individual companies, divisional and Group specialist academies, and management programs). voestalpine is an important provider of apprenticeships, particularly in the DACH region. This helps to promote the personal and professional development of employees and improve employee satisfaction

	Impact on strategy and business model	Value chain	Time horizon	Affected stakeholders
	Minimizes disruptions to operations Improves employee retention	>>> Group-wide	●●●●	Employees and non-employees
	Investments in preventive measures Promotes culture of safety	>>> Group-wide	●●●●	Employees and non-employees
	Strengthens the employer brand and corporate culture Improves employee retention	>>> Group-wide	●●●●	Employees
	Increases employer attractiveness Strategic employee retention through training and further education Promotes innovative strength	>>> Group-wide	●●●●	Employees

Key

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

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

S1-1 – Policies related to own workforce

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

HR STRATEGY 2030+

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

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

The HR Strategy 2030+ addresses a number of IROs. Material positive impacts include respect for human rights and fair working conditions, safe and healthy jobs, equal opportunity, and personal development and training of employees. Material negative impacts include accidents at work, injuries, and occupational illnesses (health and safety).

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

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

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

In order to prepare employees for ongoing changes, structures and competencies in the area of change management are being improved. Efficient HR processes and targeted use of modern technologies help to increase both quality and efficiency.

STRATEGIC SPHERES OF ACTION

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

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

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

Spotlight on female empowerment

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

HUMAN RIGHTS POLICY

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

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

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

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

The voestalpine Human Rights Policy addresses the following issues:

HUMAN RIGHTS POLICY

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

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

Training on human rights

To raise awareness of human rights, an online training program was developed in cooperation with a renowned and independent non-university research institution for fundamental and human rights. For more information on human rights training, see S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions.

Training of security staff

The security staff of the works security service consists predominantly of the company's own employees, who are subject to the voestalpine Code of Conduct. The Code of Conduct for business partners applies to external security staff. Both documents require compliance with human rights. voestalpine provides human rights training for its own employees; external security staff receive training from the respective company by which they are hired.

Collective bargaining and the right to freedom of association

voestalpine champions every employee's freedom and their right to join unions. Around 78% of all of the voestalpine Group's employees are in an employment relationship that is governed by collective agreements or comparable industry-wide agreements. In addition, there is a European Works Council and a Group Works Council in place, with an established basis for dialog with management (see chapter S1-8 Collective bargaining coverage and social dialogue).

Compensation and working hours

Working hours must comply with national legislation and prevent employees from experiencing excessive physical and mental fatigue. Employees must be entitled to at least one day off per week. Employees must be compensated in accordance with applicable legal regulations and collective agreements, and this compensation must be sufficient to meet the basic needs of both employees and their families and to provide them with a decent standard of living.

Child labor

voestalpine categorically rejects any form of child labor. Care is taken to ensure that the employment of young people does not jeopardize their health, safety, or development.

Forced and compulsory labor, human trafficking, and modern slavery

voestalpine does not tolerate any form of forced or compulsory labor, human trafficking, or modern slavery. This also includes the withholding of identification documents and passports, restrictions on the freedom of movement, and debt bondage. Both the voestalpine Code of Conduct and the company's Code of Conduct for Business Partners explicitly mention and expressly prohibit human trafficking and modern slavery.

Diversity, equal opportunities, and ban on discrimination

voestalpine is committed to respecting all people irrespective of gender, skin color, nationality, ethnicity, religion or worldview, disability, age, sexual orientation, and identity. This commitment and corresponding actions promote a climate of acceptance, equal opportunity, and mutual trust. As laid out in the “Respect and Integrity” chapter of the voestalpine Code of Conduct, the Group does not tolerate any form of discrimination. The HR Strategy 2030+ also addresses discrimination and equal opportunity in its strategic spheres of action.

In Austria, a legislative pledge to ensure the inclusion of people with disabilities has been made with the Austrian Disability Employment Act Act (*Behinderteneinstellungsgesetz*).

Reports of violations

Reports of human rights violations or breaches of the above-mentioned international guidelines can always be submitted in person to supervisors, the local or Group Human Resources departments, and the executive management. Violations can also be reported to the Human Rights Officer at the e-mail addresses humanrights@voestalpine.com and menschenrechte@voestalpine.com or anonymously using voestalpine’s online whistleblower system. This is available at <https://www.bkms-system.net/voestalpine> Further information on the whistleblower system can be found in chapter G1-1 Corporate culture and business conduct policies.

GROUP health & safety POLICY AND THE SAFETY CODE

Maintaining the health and safety of our workforce is a top priority at voestalpine and is firmly anchored in the company’s core values. The aim is to continuously reduce the frequency of accidents throughout the Group—regardless of location, activity, or role. More information can be found in chapter S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities. Protecting the health of the company’s own workforce is also a key element of the voestalpine sustainability and corporate strategies. Health and safety is pursued with the same rigor as quality assurance in products and processes. After all, lasting corporate success can only be achieved with safe and healthy working conditions.

Group-wide health and safety management is undertaken by the Group health & safety Department, which is directly linked to a member of the Management Board. Led by the chief health & safety officer, the department coordinates Group-wide activities and supports cross-divisional cooperation. In close coordination with the health & safety Committee—a body comprising representatives from all four divisions and the Group Works Council—it develops and implements measures to continuously improve the culture of safety.

In the business year 2023/24, a Group-wide Safety Code was introduced. It supplements the Group’s health & safety Policy, which has been in place since 2021 and sets minimum standards applicable throughout the Group. The implementation of these standards is binding for all sites—regardless of local statutory requirements.

The Group-wide Safety Code forms an integral part of the measures taken to improve the culture of safety at all voestalpine companies. It is based on the principle that “safety is non-negotiable and takes precedence over quality and production”—for example, by systematically stopping production if conditions are unsafe. The code was drawn up by the health & safety Committee—consisting of divisional managers and members of the Works Council—under the leadership of the Chief health & safety Officer (CHSO). It was approved by the Group Management Board within the framework of the health & safety Board.

The code is implemented across the Group by the committee members responsible for the divisions, technical managing directors, and safety managers. Internal communication includes, for example, the initiative “Ja Sicher Lok” at the Linz site, targeted information for managers, and notebooks for shop floor employees and their supervisors. The Safety Code is available digitally on the intranet via the website “Corporate health & safety.”

OCCUPATIONAL SAFETY MANAGEMENT SYSTEMS

Occupational safety management at voestalpine is based on the requirements of the internationally recognized ISO 45001 standard. The production companies operate their own occupational health and safety systems, yet remain guided by the Group-wide framework conditions.

Each division has its own committees responsible for operational implementation. The committees are made up of (technical) executives, safety managers, and other divisional managers. Strategic management is carried out centrally in line with the existing board structure. Within the divisions, the respective management boards coordinate operational implementation to ensure effective and consistent application of the safety standards.

All voestalpine production companies have a systematic management system in place for occupational health and safety. In addition, 91% of the key production sites are certified according to ISO 45001 or an equivalent national standard. Implementation of measures is carried out by trained safety staff and safety representatives, 80% of whom come from within the company. At smaller sites, their expertise is supplemented by external workers where necessary.

For quality assurance purposes, near misses are systematically documented and analyzed. A central web tool is used to document and assess the implementation of health and safety standards on an annual basis. The results are made available to select committees and incorporated into the continuous improvement process. In addition, regular internal and external audits are carried out to verify the effectiveness of the actions taken.

The relevant guidelines and documents are available throughout the Group on the intranet (“Corporate health & safety”) and on the voestalpine website. Senior executives and safety workers are regularly updated on the latest developments.

POLICY OVERVIEW

IROs addressed	Policy	Core content	Scope of the policy	Responsibility and monitoring	Other comments
All IROs from S1	HR Strategy 2030+	Positioning employees as a key competitive factor for the future and establishing voestalpine as an attractive employer	Own operations All employees	HR Board	<ul style="list-style-type: none"> » Respect for the Diversity Charter » Involvement of stakeholders through environmental analysis and ongoing participation in working groups and competence teams » Communication on employee webpages, on the external podcast and at the Supervisory Board meeting
		<p>Giving special attention to increasing the underrepresented gender in leadership positions</p> <p>Strategic spheres of action: values and culture management, employer branding, female empowerment, employee development, leadership, health and safety, Group-wide HR processes and HR IT systems</p>	Specific stakeholder groups: women, apprentices		
Respect for human rights and fair working conditions at voestalpine	Human Rights Policy	<p>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</p> <p>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</p>	<p>Own operations (all companies in which voestalpine AG has a direct or indirect holding of 50% or more, or over which it exerts control in another manner)</p> <p>All production companies</p> <p>Own workforce (employees and non-employees)</p> <p>Upstream and downstream value chain (all business partners)</p>	Head of Group Sustainability	<ul style="list-style-type: none"> » Available on the website
Healthy and safe working conditions at voestalpine	Group health & safety Policy and the Safety Code	Sets the health and safety values and the three Group-wide safety standards: mandatory safety organization, safety audits, and near-miss reporting at the production companies	<p>All production companies</p> <p>Own workforce (employees and non-employees)</p>	Management boards of the divisions	<ul style="list-style-type: none"> » Prepared by the health & safety Committee and approved by the Management Board » Available to download on the voestalpine website and internally announced to safety managers
Accidents at work, injuries, and occupational illnesses (health and safety)					
Accidents at work, injuries, and occupational illnesses (health and safety)	Occupational safety management systems	Certification according to ISO 45001 or equivalent for roughly 90% of the production companies	<p>All production companies</p> <p>Own workforce (employees and non-employees)</p> <p>Upstream value chain to a partial extent through the acquisition of external specialists</p>	Divisional representatives in the health & safety Committee	<ul style="list-style-type: none"> » Division-specific communication, managed by the divisional management boards

S1-2 – Processes for engaging with own workers and workers' representatives about impacts

voestalpine relies on the continuous dialog that it maintains with its employees and their representatives in order to systematically integrate their perspectives into business decisions. The responsibility for controlling these processes lies with the Group's Human Resources Management in close cooperation with the respective managers. The exchange is based on established formats such as employees surveys, structured feedback discussions, and regular consultations with the Works Council at the local, divisional, and Group levels. Aspects such as diversity, inclusion, and equal opportunity are also taken into account in order to maximize the range of perspectives, including in particular those of potentially disadvantaged groups. The effectiveness of the engagement is continuously reviewed through response rates, benchmarks, and the implementation and impact of measures derived from the surveys.

Group-wide employee survey

At voestalpine, employees are regularly engaged in strategically relevant issues through a Group-wide survey, among other initiatives. Since 2022, the survey has been carried out every two years and was previously conducted at three-year intervals. Around 50,500 employees from 237 companies in 47 countries were eligible to participate in the survey in fall 2024. The survey was available in 26 languages. With a response rate of 82%, the employees showed a high degree of willingness to participate and interest in the further development of the company.

The central indicator of the survey is the engagement value, which measures the emotional attachment of employees to voestalpine. Compared to the previous survey in 2022, this figure rose by six percentage points to 60% across the Group. In addition, approval ratings were collected for 18 other topics—including “professional development opportunities,” “working conditions,” “health promotion,” “diversity & inclusion,” and “leadership.” The results showed a Group-wide improvement in all categories compared with 2022. New questions also received positive responses across the board. Compared against a global benchmark, voestalpine performs above the external benchmark in the areas of “health and safety,” “effectiveness,” “team,” “availability of information,” and “innovation.”

The results were communicated to the companies at the beginning of December 2024. The respective executive management is responsible for conducting an analysis together with the employees and their representatives (if available), and deriving specific improvement action plans from this. The results and the next steps were reported on in the responsible supervisory bodies in the fourth quarter of the 2024/25 business year. The first report on measures taken is scheduled to be submitted to the Management Board of voestalpine AG in June 2025. The effectiveness of the measures will be reviewed as part of subsequent survey cycles, KPI development, and internal feedback platforms.

Appraisal dialog

The appraisal dialog is a key employee development tool and an integral part of the voestalpine leadership culture. It facilitates a structured dialog between managers and employees, and creates a binding framework for feedback, development opportunities, and target agreements. Key features of the review include careful preparation, regular implementation, and transparent documentation. Performance reviews are mandatory for all salaried employees (white collar workers) throughout the Group. For waged employees (blue collar workers), specific formats such as team member interviews are recommended but are not mandatory.

To assist with the preparation and performance of an employee performance review, a Group guide that incorporates diversity and inclusion in its content and language is available. The guide provides a framework for the content of reviews but also leaves scope to structure the review according to individual requirements. An additional supplement for senior executives makes it possible to address the topic of leadership in a targeted and appropriate manner.

During the employee performance review, individual targets and associated actions as well as development measures are defined and documented in the employee performance review guide. The agreements reached are then jointly reviewed at the next performance review. In the business year 2024/25, 34,648 employee performance reviews were conducted across the Group, of which 19,117 were with waged employees and 15,531 with salaried employees.

Social dialog with workers' representatives

The social dialog at voestalpine to engage with the company's own workforce and their representatives forms a central part of the company's philosophy and practice. voestalpine is committed to its responsibility to involve the Works Council in business decisions, especially with regard to issues that directly affect the interests of employees.

The legal framework for participation varies around the globe, resulting in different configurations of the works council structures in the countries and regions where voestalpine operates. Regardless of this, voestalpine AG pursues a consistent HR philosophy that aims to involve employees in projects and decisions to an appropriate extent. Depending on the situation and the occasion, voestalpine AG relies on established procedures for information, consultation, and participation:

- » **Information:** proactively sharing relevant company information with the works council.
- » **Consultation:** dialog and exchange of views with the works council, whereby the company listens to the council's position but independently comes to a decision.
- » **Participation:** decisions can only be made with the approval of the works council.

A regular exchange between the executive management, HR, and works council (if available) is recommended throughout the Group. Regular meetings (jour fixe) between management and workers' representatives take place at the companies with works councils. The results of these meetings form the basis for operational decisions.

At the Group level, the exchange takes place approximately twice a year within the framework of the HR platform. Representatives from the Group Works Council, the Group Management Board, the Group Human Resources Management, and the divisional HR management take part in these meetings. They cover HR issues of strategic and cross-divisional importance at the meetings. In addition, regular exchanges take place at division level between divisional management, divisional HR and the respective works council.

The **Group Works Council**, as a statutory union of all the works council bodies of the voestalpine Group in Austria, coordinates all the works council bodies in Austria and represents the common economic, social, health, and cultural interests of the employees throughout the Group. Its highest governance

body is the delegates' conference, consisting of seconded members from the companies' works councils. The delegates' conference adopts the work program and guidelines for the steering committee, appoints representatives to the Supervisory Board of voestalpine, and nominates the Austrian delegates to the European Works Council. The steering committee manages the day-to-day business of the Group Works Council and conducts negotiations with Group Management.

The **European Works Council** is an information committee responsible for representing employees at the European level. Delegates from seven European countries meet roughly twice a year to discuss cross-border issues relating to the Group's employee representation.

Workers' representatives are provided with the necessary financial and human resources in line with the statutory regulations applicable in the respective countries. Aside from the existing institutional arrangements established at national and European level, there is currently no Group-wide framework agreement in place with workers' representatives that applies to all sites worldwide. This also applies to agreements relating to respect for human rights in the working environment. However, voestalpine AG ensures that relevant national and international requirements are complied with in the respective countries and addressed within the framework of the existing participation structures.

Employee shareholding scheme

voestalpine has had an employee shareholding scheme since 2001, which has been continually expanded in the years since its introduction. In addition to all Austrian employees, employees in the United Kingdom, Germany, the Netherlands, Poland, Belgium, Czechia, Italy, Switzerland, Romania, Spain, and Sweden are also involved in the scheme.

The voting rights associated with stock issued to employees are combined in the voestalpine Mitarbeiterbeteiligung Privatstiftung (employee foundation for the Group's employee shareholding scheme), making this entity a stable, key shareholder of voestalpine AG. As of March 31, 2025, a total of around 26,600 employees hold shares in voestalpine AG. They hold approximately 26.3 million shares, which corresponds to 14.7% of the company's share capital (previous year: 14.8%) due to the general bundling of voting rights.

S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns

voestalpine AG relies on a structured process to address and reduce material negative impacts to its own workforce. This includes collecting feedback from various sources, analyzing the results and implementing targeted remedies. It is based on a systematic approach that involves regular reviews as well as continuous feedback processes and clearly defined reporting channels. When material negative impacts are identified, targeted remedies adapted to specific needs are employed. These may include, among other things, training opportunities, psychosocial counseling, and adjusting working conditions. The effectiveness of these actions is continuously assessed through employee feedback, internal monitoring, and internal audits.

In addition to platforms such as the appraisal dialogue and the follow-up process after the employee survey, other channels set up by voestalpine AG are available for the employees to express their concerns and have them examined:

1. **Whistleblower system** (<https://www.bkms-system.net/voestalpine>)
2. E-mail address of the **Group's Human Rights Officer**
(humanrights@voestalpine.com, menschenrechte@voestalpine.com)
3. E-mail address of the **central compliance contact point** (group-compliance@voestalpine.com)
4. Getting into direct contact with voestalpine AG's **Group Human Resources**

The bodies contacted look into the concerns raised, investigate any complaints, and inform the employees who have contacted them of any decisions or outcomes. Further information can be found in the chapter G1-1 Corporate culture and business conduct policies in the section on the whistleblower system.

S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Targeted measures are implemented by voestalpine AG across the Group to manage material impacts on the workforce. These address both positive impacts—for example, by promoting diversity and development opportunities—and potential negative impacts—for example in the context of restructuring or risks to the safety and health of employees. Actions taken are based on strategic concepts, coordinated across divisions, and continuously developed. They aim to ensure the employability of employees, create an attractive framework, and identify and mitigate risks at an early stage.

In the voestalpine Group, suitable measures to prevent or mitigate negative impacts are generally selected on the basis of systematic risk analyses, internal evaluations, and feedback from relevant stakeholders, such as employees. The specific formulation of actions to be taken is adapted to the respective impact and the operational context. Depending on the subject area, different specialist departments, senior executives, workers' representatives, or specialized committees are involved in the development and evaluation of possible action plans. The aim is to identify effective yet achievable solutions that are tailored to the identified risks. The prioritization of risks may be based on, for example, the magnitude of the potential impact, the affected group of workers, and the urgency of the situation.

The effectiveness of key actions is checked through various processes in the voestalpine Group. These include standardized evaluations, feedback instruments, monitoring data such as training participation, and site-specific audits and surveys (e.g., in the field of health & safety). Specific targets (e.g., proportion of women, accident metrics) are used as indicators. The findings from these review processes are feed into the further development of existing concepts and action plans.

The necessary funds for these action plans are made available by voestalpine AG. Funding is allocated for impacts in the field of health and safety by the health & safety Board, and for HR-related impacts by the HR Board. The Group health & safety and HR departments are responsible for the development and implementation of the action plans.

A description of the key spheres of action related to material impacts on voestalpine's own workforce is provided below.

Diversity and equal opportunities

Targeted measures are implemented by voestalpine AG throughout the Group to strengthen equal opportunities and actively promote diversity in the long term. A core element of this approach is a comprehensive set of actions, which includes programs to promote women in the company, target group-specific employer branding, and actions to improve work-life balance. The following actions contribute to equal opportunities for all employees—an aspect that was found to be a material positive impact of voestalpine AG.

Female empowerment as a strategic sphere of action

An important building block for promoting diversity is the strategic sphere of action “Female Empowerment” included in the HR policy 2030+. The aim is to position voestalpine AG as an attractive employer for women—both among current and potential employees. In light of this, a Group-wide target for increasing the proportion of women has been set. For more information, see chapter S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities.

After the initial initiatives for positioning, retaining, and guiding/supporting/empowering women were initiated across divisions, the Competence Team for HR and Organizational Development took over Group-wide coordination in the business year 2024/25. In relation hereto, a sub-competence team containing representatives from all divisions and various professions was established, which specifically addresses the topic of female empowerment twice a year. This team discusses action plans—both planned and already implemented—and reflects on Group-wide topics. On the one hand, this supports independent follow-up on the topics in the organizational units; on the other hand, it facilitates Group-wide coordination, for example with regard to resources and strategic orientation.

The following aspects constitute the most important actions in the three defined spheres of action:

1. Positioning

Actions for positioning include target group-specific marketing, positioning, and recruiting, initiatives for early outreach—for example through school partnerships, cooperation with the labor market service to address women in a targeted manner, and target group-specific apprenticeship marketing—childcare facilities offering up to 24/7 care at the Linz site, certifications such as the Austrian “equalitA seal of quality,” and representation at specific events such as the “HR Connects” from business upper austria and the Female Empowerment Festival “Let’s get visible” in Linz.

2. Retaining

The actions to retain female employees include the expansion of flexible working time models, internal e-learning courses, workshops to raise awareness of how to interact with one another, thematic focus areas in the education program, the use of gender-sensitive language, a dedicated female empowerment section in the Group-wide intranet, and a newsletter that focuses on women at voestalpine AG, the expansion of childcare facilities and the establishment and expansion of women’s networks.

3. Guiding, supporting, empowering

Actions on this topic include establishing female empowerment as a fixed element of the education program, ensuring women represent at least 20% of the participants women in the internal management training program value:program, female empowerment as a focus in management training programs, a mentoring program for women who show potential, measures to cushion the career break after maternity leave—including specific part-time models—and an increased focus on female high-potential employees in succession planning.

Training on human rights

As part of its human rights due diligence obligations, voestalpine provides mandatory e-learning courses for employees and additional training for safety staff. The aim behind this is to raise awareness of human rights issues and identify potential risks at an early stage. Training is carried out by the respective Group companies and is supported by ongoing monitoring of participation rates and training volumes.

It is aimed at all employees with access to e-learning courses and is available in 14 languages. The training program provides information and guidance on human rights compliance and includes three mandatory modules on the following topics:

MODULE 1: Fundamental of Human Rights

- » Definition
- » Human Rights at voestalpine
- » Code of Conduct
- » Sustainable Development Goals
- » Corporate Responsibility

MODULE 2: Human Rights in Day-to-Day Work

- » Working Conditions
- » Non-Discrimination
- » Equal Opportunity
- » Right to Freedom of Association
- » Right to Education

MODULE 3: Human Rights in the Supply Chain

- » Critical Human Rights
- » Success and Risks
- » Alliances
- » SSCM and CR Checklist
- » Consequences

At the end of the business year 2024/25, 92% of the assigned human rights training courses had been successfully completed.

Personal development and training

As an undertaking, voestalpine AG is committed to improving training and development on an ongoing basis in order to bring the competencies of its employees in line with current and future requirements. This is also anchored in the spheres of action of the HR Strategy 2030+. The following measures contribute to the personal training and development of the employees—an aspect that has been assessed as a material positive impact of voestalpine AG—as well as to achieving the targets of the HR Strategy 2030+.

In the business year 2024/25, Group-wide expenses for personnel development came to over EUR 76 million. 84.7% of all Group employees (excluding apprentices) took part in training and development programs. The total volume of training was 839,068 hours, which equates to an average of 20.8 hours per participant.

voestalpine COACHING

Lifelong learning forms an integral part of employee development at the Group. The online platform voestalpine COACHING allows voestalpine employees to individually arrange coaching sessions world-wide. These sessions provide professional support for personal transformations in a professional context.

Coaching assists with self-reflection, is solution- and goal-oriented, and promotes professional and personal development. Occasions when coaching may be required include entering a new position, leadership responsibility, change situations, personal development, career issues, and stressful situations. Coaching is also offered as part of the Group-wide “value:program” and in the voestalpine Group-IT management training program.

In the business year 2024/25, around 720 hours of coaching were completed across the Group. Coaching primarily focused on personal development. The proportion of female participants was 41.5%.

Management training program—“value:program”

In the business year 2024/25, voestalpine continued to rely on its Group-wide “value:program” to train current and future managers. The multi-stage program combines training courses provided by external experts that employ a diverse range of methods with the active participation of voestalpine senior executives. Members of the company management participate as presenters, project supervisors, and sparring partners, thereby facilitating a practical exchange.

One key feature of the program is the international and cross-sectoral demographic of the participants, which creates personal networks across national and divisional borders. Project work undertaken as part of the program is supervised by project supervisors who actively promote collaboration in interdisciplinary and intercultural teams.

For quality assurance purposes, all modules are evaluated after completion. Feedback from the participants, the latest developments, and company-wide values are used to further develop the content as required.

In the business year 2024/25, 262 participants from 25 countries took part in the “value:program.” The Group-wide target of at least 20% female participants was achieved through targeted nominations. The proportion of women that participated in “value:program” in 2024/25 came to 26.3%.

Regional programs

» Young Professionals Training Program China

The Young Professional Training Program China (YPTP) is a training program for young talent and aspiring senior executives launched for Group companies in China. The sixth program was launched in fall 2024 with a virtual kick-off. The program consists of three modules, which take place at various voestalpine sites in China. The first module was held in Shanghai in December 2024 and the second in Suzhou in March 2025. The final third module is scheduled to take place in Shenyang in June 2025. The content of the program combines entity-specific topics such as compliance and strategy with the further development of technical and social skills.

» Get Connected Program North America

The Get Connected Program North America (GCP) is available to voestalpine Group companies in Canada, Mexico, and the United States. It consists of the “Early Career Program” (ECP) and the “Next Level Program” (NLP). The aim behind the program is to retain young talent at an early stage and support future senior executives in the transition to their new role. The program was launched in the business year 2024/25 with an online kick-off event. Three in-person modules held at voestalpine sites in North America (Atlanta, Toronto, and Chicago) provide an opportunity for exchange and to gain an insight into various operations. The modules combine company-related topics such as organizational structure and strategy with skills development and networking.

Specialist programs

» HR academy

The HR academy is a Group-wide training program for voestalpine HR professionals. It is aimed at HR generalists and specialists who want to improve their competencies in HR management in the Group. The program consists of three modules. The sixth academy kicked off in February 2025 with the first module; two more will follow in the business year 2025/26.

The HR academy is designed to support HR managers in their role as a link between senior executives and employees, enabling them to make an active contribution to the implementation of the company's targets. The content of the academy focuses on the Group-wide HR strategy and the application of central HR tools, practice-oriented consulting methods, and the latest topics in the field such as HR trends, communication, finance for HR, and leadership. The three on-site modules are supplemented by webinars and e-learning courses.

» purchasing power academy

The purchasing power academy is a Group-wide training program available to the approximately 600 buyers at voestalpine. It consists of two competence levels (level 1—specialist and level 2—master) and supplementary content as part of lifelong learning, which includes role and subject-specific content.

Both levels are structured in the same way: The first step is a kick-off discussion with the participants and an assignment talk with the respective manager. This is followed by e-learning and self-study documents. The main element is a one-week on-site seminar. Each level concludes with a conversation between the participant, their direct manager, and a member of the responsible purchasing committee. If the assessment is positive, a certificate of successful completion of the respective level is issued.

Apprentices/trainees

As of the annual reporting date (March 31, 2025), the voestalpine Group was training 1,574 apprentices in about 50 skilled trades, the majority thereof (68%) at locations in Austria. A total of 14% of apprentices were being trained in Germany under the dual system applicable in that country. Because apprenticeships are based on defined requirements, almost all of the apprentices who successfully complete their training are offered an employment contract. voestalpine clearly believes that it has the duty to invest in the training of young, skilled workers. In addition to excellent professional training, attention is also paid to developing personal and social skills. On average, the Group invests more than EUR 100,000 in training each apprentice.

The company will offer some 500 trainee slots in the next training year (starting in September 2025) in Austria, Germany, and Switzerland. To give interested young people insights into the vocational

training programs on offer at voestalpine, open house days are held at various training locations, designed in a way that targets the specific audience with the involvement of apprentices. One particular aim is to get girls interested in technical professions. The proportion of women in technical apprenticeships has increased by roughly 63% in the past ten years and currently stands at 17.8%. Measures such as participation in careers fairs and visits to schools as well as Girls' Day are undertaken to further increase the proportion of women in technical apprenticeships in particular.

The international success of voestalpine apprentices confirms the quality of their training, such as the Medallion for Excellence obtained in the plant electrical engineering category at the WorldSkills vocational championships in Lyon in September 2024.

In addition to their everyday training, apprentices at voestalpine are encouraged and challenged in terms of self-development and personal growth. Examples include team-building seminars, stints of employment abroad, or language trips. The importance of solidarity and social engagement is another focus point, for example, through participation in the 3-Bridges Run in Linz, where an apprentice team consisting of more than 140 apprentices and their trainers collected points ("cares") during the voestalpine cares runs, helping those in need. For more information about the voestalpine cares run see chapter 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.

Through a variety of actions taken, voestalpine AG underscores the importance of vocational training and demonstrates how apprenticeship programs can be set up in line with a forward-thinking approach, such as with solutions like the voestalpine BÖHLER CAMPUS, which offers housing for up to 60 apprentices for the duration of their training starting in fall 2025.

"I CHOOSE voestalpine" apprentice campaign

Under the established slogan "I choose," voestalpine once again launched its apprenticeship campaign in 2024, which specifically addresses the needs of young people. The campaign focuses on youth empowerment with a focus on values such as team spirit, safety, diversity, and quality of education.

The aim of the cross-media campaign is to highlight the future prospects of an apprenticeship and to make voestalpine AG tangible as an employer. Apprentices from voestalpine act as ambassadors and provide authentic insights into their training. Using platforms such as word raps, apprenticeships, and humorous short videos, they demonstrate their satisfaction with apprenticeships at voestalpine. With the new video series "Wordraps," voestalpine AG is focusing primarily on addressing potential apprentices in a targeted manner and on an equal footing. The campaign employs a wide range of communication channels, such as the company's own corporate apprenticeship website (<https://www.voestalpine.com/lehre>), social media, print media, and internal channels to reach young people, their parents, and teachers. TikTok and Snapchat are increasingly being used to address the youngest target group, including the use of our very own Snapchat filter.

Group Apprentice Day

Group Apprentice Day is a special experience during the apprenticeship period: In the program's final year, all trainees and apprentices are invited to Linz to spend an eventful day that includes a talk with Management Board members, a tour of the plant, team challenges, along with fun and action. Due to the reconstruction of voestalpine Stahlwelt, the 2024 Group Apprentice Day took place at the Raiffeisen Arena in Linz.

The façade and roof of the arena are made from 19,000 m² of voestalpine greentec steel. In keeping with the location, the theme of the day was “Team Spirit.” 398 apprentices in their final year of training and their trainers from 40 sites in Austria, Germany, and Switzerland took the opportunity to meet in person and get to know the Group headquarters in Linz at the voestalpine Group Apprentice Day on October 22, 2024.

As a highlight, the whole voestalpine Management Board took to the stage together with selected apprentices and shared its experience with the young people. The apprentices themselves also had the opportunity to talk about their previous achievements and current projects. In his keynote speech, EU Youth Ambassador and encourager Ali Mahlodji motivated the young professionals to take their future into their own hands. Between the items on the agenda, there was also an opportunity for close exchanges with colleagues from other locations—a celebration of appreciation and a powerful demonstration of the importance of apprenticeships.

health & safety

When it comes to health and safety, voestalpine AG is committed to continuously improving its working conditions. The action plans address both positive and negative impacts related to the impacts of “Healthy and safe working conditions” and “Accidents at work, injuries, and occupational diseases (health & safety).”

With the package of actions for health and safety, voestalpine AG ensures that working conditions are continuously improved, and that the health and safety of all workers are protected. Adopting a responsible approach toward these issues is firmly anchored in the management and organizational structures.

The package of actions, which is aligned with the targets of the Group’s health & safety Policy, includes:

- » The annual health & safety calendar with changing focus topics;
- » Safety posters to raise operational awareness;
- » Pictograms “Red Lines”/“Iron Rules” (at the Linz site);
- » Event-related priorities;
- » Site-specific audits and inspections; and
- » Digital formats such as safety spots and safety quiz.

In addition, site-specific safety instructions are provided for employees and external workers as well as external visitors and service providers. Implementation within the companies is flexible and takes into account local requirements.

These actions help to reduce occupational accidents, minimize health risks, and sustainably improve the culture of safety. Existing standards are reviewed on a regular basis and further developed as required.

The responsibility for implementation and monitoring lies with the health & safety Department and with the local safety managers in coordination with technical management. Mandatory participation in safety training courses is documented and tracked. The engagement and participation of workers’ representatives and safety staff ensure practical and effective action that is geared toward specific operational requirements is pursued. The company ensures the necessary financial and human resources are provided in an appropriate form.

In recent years, the number of occupational accidents across the Group has been significantly reduced. This is also reflected in the Group-wide target “reduce the frequency of accidents.” For more information, see chapter S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities. This decline is the result of consistent and structured health and safety actions that have been effectively rolled out in the divisions.

The companies have a wide range of support instruments at their disposal. The specific selection and implementation of actions is carried out for each site by the respective divisions in close coordination with the responsible safety managers.

health & safety training

voestalpine AG companies regularly hold safety meetings with all of their employees. Monthly discussions between master craftspeople and staff, as well as the 15-minute safety training by safety staff and safety representatives, provide key formats for communicating occupational safety measures. Workers’ representatives are also actively involved in this process in order to jointly develop actions to improve safety.

Additionally, quarterly safety inspections are conducted by executive management, with one inspection each year being carried out with the involvement of Management Board members. All employees are required to complete an online training course on health and safety that conveys the safety values and standards of voestalpine AG and supplements the classroom-based training. Targeted training courses for management and master craftspeople are also held. The health & safety Committee supports cross-site safety efforts by annually publishing a safety calendar with monthly focus topics, available in both digital and printed formats.

Economic crisis or restructuring

In dealing with economically challenging situations, voestalpine AG relies on a structured set of actions under the title “Economic crisis situations and restructuring.” The focus is on early and open communication with the workforce in order to counter uncertainty and build trust. Key actions include transparent decision-making processes, activities to safeguard jobs, and the development of socially acceptable solutions in the event of necessary adjustments. Once all other possibilities have been exhausted, drawing up and implementing social plans is a last resort. The aim is to help the affected employees, alleviate economic disadvantages, or open up new career prospects. The necessary action plans are implemented according to requirements and always in close coordination with the workers’ representatives.

In order to mitigate the potential negative impacts related to economic crises or restructuring, the following actions are optionally applicable:

- 1. Improving job security:** Introducing actions to safeguard jobs, such as flexible working models and job rotation.
- 2. Communication and transparency:** Communicating regularly and openly with employees on the economic situation and planned actions to reduce uncertainty.
- 3. Retraining:** Offering training and retraining programs to prepare employees for new jobs and to increase their employability.

4. **The Stahlstiftung (Steel Foundation):** Utilization of the internal steel foundation with targeted training programs to support career reorientation, specifically for Austrian employees.
5. **Reduced working hours:** Flexible working models, also with a temporary reduction in working hours, to bridge the slump in orders.
6. **Social plans:** Development and implementation of social plans (specific to Austria and Germany) to cushion the impacts of job losses and create opportunities for reorientation.

The Stahlstiftung

The Stahlstiftung (Steel Foundation) was founded in Linz, Austria, in 1987. Its main objective is to provide comprehensive support to employees who have lost their jobs for economic or structural reasons to reorient their careers, training, and development, and find new jobs—thereby significantly improving their opportunities in the labor market.

OVERVIEW OF ACTIONS

IROs addressed	Action	Core content and expected results
Equal opportunities for all employees	"Diversity and equal opportunities" set of actions	<p>Wide range of female empowerment (FE) actions, including</p> <ul style="list-style-type: none"> Target group-specific recruitment and cooperation with the public employment service and schools Up to 24/7 childcare in Linz Flexible working time models Use of gender-sensitive language Newsletter and intranet page for FE "Women in production" project FE as a focus in management training Mentoring program <p>Expected results:</p> <ul style="list-style-type: none"> » Increase in the proportion of women and improvement to equal opportunities » Higher employee satisfaction
Respect for human rights and fair working conditions at voestalpine	Training on human rights	<p>Mandatory three-part e-learning course for employees on the topic of human rights</p> <p>Human rights training programs for security personnel (internal and external)</p> <p>Expected results:</p> <ul style="list-style-type: none"> » Raised awareness of human rights at voestalpine
Personal development and training	"Personal development and training" set of actions	<p>"value;program" for management training</p> <p>Apprenticeship training in AT and DE, apprenticeship website, social media, apprenticeship campaigns, Group Apprentice Day, various initiatives in the divisions</p> <p>Other regional and technical actions</p> <p>Expected results:</p> <ul style="list-style-type: none"> » Retention and development of skilled workers » Higher employer attractiveness and employee loyalty
Healthy and safe working conditions at voestalpine Accidents at work, injuries, and occupational illnesses (health and safety)	"health & safety" set of actions	<p>health & safety calendar</p> <p>Posters on the topic of safety</p> <p>Main topics</p> <p>Safety spots</p> <p>E-learning courses</p> <p>Site-specific audits and inspections; and</p> <p>Safety instructions for external service providers (site-specific)</p> <p>Annual health and safety exam on creating work programs</p> <p>Committee and board meetings</p> <p>Expected results:</p> <ul style="list-style-type: none"> » Reduction in occupational accidents and health risks at voestalpine

Up to four years of training and continuing professional development are funded for this purpose in collaboration with the Austrian public employment service (AMS). In the business year 2024/25, over 81% of the participants looking for work were able to develop a new professional perspective with the help of the Stahlstiftung.

In the business year 2024/25, 407 people received support from the traditional labor foundation, and the total number of active foundation participants was therefore 7.4% higher than in the previous year. In addition, 91 people in the reporting period received support on their educational leave. The Stahlstiftung has helped 196 people to improve their perspectives—with the aim of maintaining employability in different phases of life.

Time horizon	Scope of the action	Responsibility and monitoring	Significant expenditure (if relevant)	Other comments
Implementation of the set of actions by 2026 at the latest	Own operations Employees	HR Board Monitoring of the proportion of women in top management and in the “value:program”	–	» Some measures already implemented in BY 2024/25 » Consideration of findings from employee surveys, interviews, working groups, and competence teams
Current actions	Own operations All employees External security personnel (upstream)	HR Board Monitoring of the number of participants and training volume per participant	–	–
Current actions	Own operations All employees Apprentices in the DACH region	HR Board Monitoring of the number of participants and training volume per participant	Yes, OpEx (EUR 69.3 million total annual cost for employee development)	Identification of training needs at appraisal dialog
Dependent on actions taken	Own operations Own workforce (employees and non-employees)	health & safety + health & safety Committee or safety manager with local (technical) management Monitoring of training attendance and safety instructions (mandatory)	–	» Consideration of the interests of safety managers and workers' representatives » Remedial action taken as required

IROs addressed	Action	Core content and expected results
Economic crisis or restructuring	"Economic crisis or restructuring" set of actions	<ul style="list-style-type: none"> » Regular and open communication with employees about economic situation » Introduction of action plans to secure jobs, such as flexible working time models and internal job changes » Training and retraining programs offered to prepare employees for new jobs and increase their employability » Utilization of the internal Stahlstiftung with targeted training programs to support career reorientation » Flexible working time models, also including temporary reductions in working time to overcome periods of low order levels » If needed, development and implementation of social plans to cushion the impacts of job losses and create opportunities for reorientation <p>Expected results:</p> <ul style="list-style-type: none"> » Increased job security and employability of employees » Mitigation of negative impacts in the event of job losses

METRICS AND TARGETS

S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Target: to increase the proportion of women

As part of the HR Strategy 2030+ strategic sphere of action "Female empowerment," voestalpine aims to position itself as an attractive employer for women—both for current and potential employees. Female empowerment contributes to diversity in decision-making positions, increasing employee engagement, and promoting a positive corporate culture. The aim is to measure and strengthen the positive impacts identified for "equal opportunity for all employees."

A gender-balanced approach at the company counteracts social inequalities and strengthens the right to fair participation in working life—a fundamental principle of sustainable development. By aiming to increase the proportion of women—especially in leadership positions—voestalpine AG is strengthening human rights principles.

Equal opportunity in the world of work is one of the internationally recognized human rights, in particular the ILO core labor standards. voestalpine AG supports the UN sustainability goal SDG 5. In particular, the focus is on sub-objective 5.5, which entails "ensuring that women are equally involved at all levels of decision-making." This SDG objective is also anchored in the European Union's strategic frameworks—including the EU Green Deal and the EU Sustainable Finance Agenda. voestalpine contributes to the implementation of these European objectives and to the EU Gender Equality Strategy, which aims to achieve a gender-equitable Europe.

Time horizon	Scope of the action	Responsibility and monitoring	Significant expenditure (if relevant)	Other comments
At short notice, if required	Own operations	HR board	–	<ul style="list-style-type: none"> » Stahlstiftung already involved in operations » Develop action plans with the employee representatives

A higher proportion of women further strengthens the competitiveness and sustainability of the company. Diverse teams have been found to be more resilient, innovative, and decisive, which represent key advantages for the management of complex industrial structures. Targeted support for women in underrepresented areas also unlocks previously untapped talent potential and helps to overcome the shortage of skilled workers.

At the same time, a visible commitment to equal opportunity increases employer attractiveness—especially among younger generations—and fosters a cultural shift toward an inclusive, modern corporate culture.

In concrete terms, the undertaking strives to increase the proportion of women at all qualification levels throughout the Group. In particular, the proportion of female senior executives is to be increased from 14% (business year 2023/24) to 18% by 2030. Senior executives are defined as employees with disciplinary personnel responsibility, with the exclusion of board members. This target is based on an evaluation of the previous development and the current gender distribution in the Group.

TARGET: TO INCREASE THE PROPORTION OF WOMEN

KPI	Percentage of women in leadership	
UNIT	in percent	
BASE VALUE	STATUS	TARGET VALUE
14% Business year 2023/24	14.4% Business year 2024/25	18% Business year 2029/30
Responsibility and monitoring	HR Board	
Scope	All female executives (employees with disciplinary personnel responsibility, with the exclusion of board members)	
Stakeholders	Employees and workers' representatives	
IRO addressed	Equal opportunities for all employees	
Reference to policy	HR Strategy 2030+	

HR targets in relation to female empowerment are set as part of a participatory process with the engagement of employees and workers' representatives. Measures include regular employees surveys, stakeholder communication, topic-specific task forces, and regular committee meetings with the divisional HR managers. The goal is to take different points of view into account and to ensure the relevance and feasibility of the targets.

Implementation and target achievement are accompanied by regular reviews and evaluations based on quantitative and qualitative indicators. In addition, feedback tools such as employee surveys and joint review platforms with employees are used to gain additional knowledge and derive actions if necessary. This approach strengthens the company's commitment to diversity and inclusion and promotes an open and collaborative corporate culture.

The goal to increase the proportion of women in management positions is anchored in corporate governance. It is monitored and evaluated as part of the ongoing management processes and, where necessary, further enhanced by taking actions and setting initiatives.

As of March 31, 2025, the total proportion of women in the voestalpine Group was 16.4%. The percentage of female workers among wage employees was 7.3%; among salaried employees it was 29.9%. The proportion of female senior executives was 14.4%. In all categories, there was a slight increase compared with the previous year.

Target: reduce the frequency of accidents

This target has been set on the basis of the international standard ISO 45001, as well as national and European targets for occupational health and safety. In particular, voestalpine AG takes into account the objectives of the EU Strategic Framework on Health and Safety at Work 2021 – 2027, which, among other aspects, pursues the guiding principle of “Vision Zero”—i.e., zero fatalities due to occupational accidents. The objective is to systematically reduce work-related health risks and to adjust the level of safety in line with internationally recognized standards throughout the Group. The health & safety Committee, consisting of the respective representatives of the divisions and workers' representatives, sets the Group's targets, which are ultimately approved by health & safety Board.

Implementation and target achievement are ensured by periodic reviews and evaluations as part of the quarterly health & safety Committee meetings or the semi-annual health & safety Board meetings.

The Lost Time Injury Frequency Rate (LTIFR) indicates the frequency of accidents based on the number of recordable workplace accidents entailing more than three sick days per one million hours worked. To ensure uniform comparability, the definitions of recordable accidents, days lost, and hours worked have been standardized across the Group—especially in light of the differing national regulations.

Reducing the frequency of accidents contributes significantly to sustainable development, as safe working conditions represent a key element of decent working (SDG 8 “Decent Working and Economic Growth”) and ensure the long-term viability and health of employees.

For employees, this means a lower risk of injury and an overall safer and healthier working environment. For the company, the systematic prevention of occupational accidents increases operational stability, reduces downtime, and enhances employer attractiveness—especially in safety-critical work areas.

In relation to health and safety, voestalpine aims to reduce the accident rate to the target value of 5.5 by the end of the business year 2029/30.

The Group health & safety Department reviews this target within the scope of Group-wide reporting and control processes.

TARGET: REDUCE THE FREQUENCY OF ACCIDENTS

KPI	LTIFR (lost time injury frequency rate)	
UNIT	Recordable accidents per million hours worked	
BASE VALUE	STATUS	TARGET VALUE
16.1 Business year 2015/16	7.0 Business year 2024/25	5.5 Business year 2029/30
Responsibility and monitoring	health & safety Committee and health & safety Board	
Scope	Own operations, own workforce (employees and non-employees)	
Stakeholders	Own workforce	
IRO addressed	» Accidents at work, injuries, and occupational illnesses » Healthy and safe working conditions at voestalpine	
Reference to policy	» Group health & safety Policy » Occupational safety management systems	

S1-6 – Characteristics of the undertaking’s employees

The following information is presented based on head count. The number of persons represents the total of waged and salaried employees, with both fixed-term and permanent contracts, including the number of apprentices. Together, these employee groups form the number of employees. No employees with zero hours contract are employed by the Group.

Unless otherwise stated, the following metrics refer to the reporting date of March 31, 2025.

As of the reporting date (March 31, 2025), the voestalpine Group had a global workforce of 49,298 employees (including apprentices). Of these, 1,574 apprentices were receiving training at the voestalpine Group as of March 31, 2025. Overall, the number of employees fell by 1,297 or 2.6% compared to the previous year. This reduction is primarily due to the sale of Buderus Edelstahl GmbH.

In the Annual Report, the information according to S1-6 is presented in chapter D.27. Information on employees.

EMPLOYEES BY GENDER

Headcount, as of the March 31, 2025 reporting date

	Total
Gender	
Male	41,114
Female	8,184
Other	0
Total Employees	49,298

EMPLOYEES BY COUNTRY

Headcount in countries with companies that have
>50 employees and constitute >10% of the Group workforce as of March 31, 2025

	Austria	Germany
Gender		
Male	20,520	5,297
Female	3,803	1,109
Other	0	0
Total Employees	24,323	6,406

EMPLOYEES ACCORDING TO TYPE OF CONTRACT AND GENDER

Headcount as of the March 31, 2025 reporting date

	Female	Male	Other	Total
2024/25				
Number of Employees	8,184	41,114	0	49,298
Number of permanent employees	6,926	35,518	0	42,444
Number of temporary employees	1,258	5,596	0	6,854
Number of non-guaranteed hours employees	0	0	0	0

Numerous measures in the voestalpine Group aim to make the best possible use of the knowledge and experience of the employees and to increase their job satisfaction. This also helps to keep the fluctuation rate as low as possible. Based on the total number of employees employed as of the reporting date (excluding apprentices), which amounted to 47,724, the turnover rate for employment contracts terminated by mutual consent or by employees was 7.8% in the business year 2024/25. A total of 5,577 employees (excluding apprentices) left the company (e.g., due to resignation, retirement, death), 121 less employees than in the business year 2023/24 (5,698). This corresponds to an overall turnover rate of 11.7%, which is 0.1% higher than in the previous year. The number of apprentices increased by 4% compared with business year 2023/24, rising from 1,513 to 1,574 apprentices.

S1-8 – Collective bargaining coverage and social dialogue

voestalpine AG is committed to freedom of association and right of its employees to organize themselves in a union. As of the reporting date for the business year 2024/25, of the 38,168 employees employed by the voestalpine Group in the EEA area (including apprentices), a total of 88.7%, or 33,839, were covered by a collective agreement—of which 98.8% in Austria and 65.4% in Germany.

In many voestalpine Group companies, a works council represents employees' interests. Austria and Germany, which have a significant number of the Group employees in the EEA region, play a particularly important role. Of the 49,298 employees employed worldwide, these two countries account for 62.3%, i.e., 30,729 employees. Of these, 98.6% of employees in Austria and 88.1% in Germany are represented by a works council.

COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

	Collective Bargaining Coverage		Social Dialogue
	Employees—EEA ¹	Employees—Non-EEA ²	Workplace Representation (EEA only ³)
Coverage Rate			
0 – 19%			
20 – 39%			
40 – 59%			
60 – 79%	Germany		
80 – 100%	Austria		Germany, Austria

¹ Employees—EEA (for countries with > 50 employees representing > 10% total empl.)

² Employees—Non-EEA (estimate for regions with > 50 employees representing > 10% total empl.)

³ Workplace representation (EEA only) (for countries with > 50 employees representing > 10% total empl.)

S1-9 – Diversity metrics

Top management:

The top management of the voestalpine Group (headquartered in Linz) comprises the Management Board of voestalpine AG and executive management of the divisional subsidiaries. At the end of the reporting year, the proportion of women in top management was 11.1%.

GENDER DISTRIBUTION AT THE TOP MANAGEMENT LEVEL

Top Management	Number	Percentage
Male	16	88.9%
Female	2	11.1%
Other	0	0.0%
Total	18	100.0%

Age structure in the Group:

A balanced age structure helps ensure the transfer of knowledge, make age-related departures predictable, and avoid staff shortages. It makes it easier to replace employees entering retirement in a timely manner. To achieve this, employees need to feel loyal to voestalpine and be retained in the long term. As of March 31, 2025, the average age of employees in the voestalpine Group—excluding apprentices—was 41.7 years old. The following table shows the age distribution of the workforce (excluding apprentices):

AGE STRUCTURE OF EMPLOYEES (EXCLUDING APPRENTICES)

	Number	Percentage
Under 30 years old	8,795	18.4%
30 – 50 years old	26,517	55.6%
Over 50 years old	12,412	26.0%

S1-10 – Adequate wages

voestalpine upholds minimum social standards throughout the Group with its Code of Conduct. Chapter 5, “Social Responsibility,” states the following obligation under the heading “Compensation”: *employees must be compensated in accordance with applicable legal regulations and collective agreements, and this compensation must be sufficient to meet the basic needs of both employees and their families and to provide them with a decent standard of living.*

This requirement must be implemented in every Group company. The respective executive management verifies compliance with the code every two years with their signatures. As of the business year 2025/26, companies will be required to undergo spot checks to review compliance.

S1-14 – health & safety metrics

The following quantitative information on occupational health and safety relates exclusively to employees of the voestalpine Group. Information on non-employee workers is not yet included in the first reporting year.

In the business year 2024/25, 597 recordable workplace accidents were recorded in the voestalpine Group. The Lost Time Injury Frequency Rate (LTIFR), which is calculated uniformly across the Group, indicates the number of recordable workplace accidents entailing more than three sick days per one million hours of work performed. For the year under review, the LTIFR came to 7.0. Unfortunately, there were also two fatal accidents involving voestalpine employees.

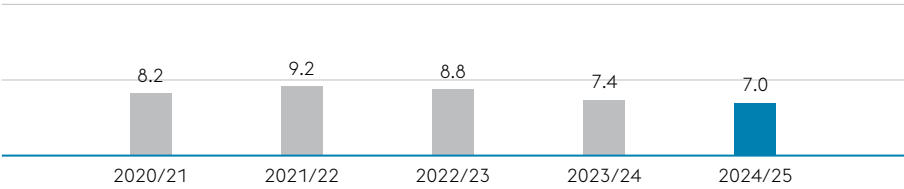
Near misses are also systematically recorded as part of a Group-wide health & safety web tool. Actions to improve the situation are defined on the basis of the review of incident reports and documented if necessary.

Thanks to consistent health and safety measures across all divisions, the number of workplace accidents has been significantly reduced in recent years. Ongoing classroom training at all sites contributed to the further reduction in the frequency of accidents in the business year 2024/25.

The LTIFR metric is documented on a Group-wide basis and evaluated using an internal system.

DEVELOPMENT OF THE LOST TIME INJURY FREQUENCY RATE (LTIFR)

As of the March 31 reporting date



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

In order to determine the income gap between men and women in the Group, the gender pay gap was calculated on the basis of annual total remuneration (fixed and variable components, as well as benefits in kind), target hours, and overtime paid. Target hours may take into account the available capacity of part-time workers. New hires and departures during the reporting period were also taken into account. To ensure valid comparability, the members of the Management Board were not included in the calculation as they are not considered employees. Apprentices are not included in the calculation either. The data reported by the companies was first recorded in the domestic currency at the individual level and then converted to euros for the purpose of comparability. In the voestalpine Group, the gender pay gap (excluding the Management Board) came to 19.8%. The disparity can be explained, among other things, by the different fields of activity (service sector, production companies, etc.), by the higher proportion of part-time workers, as well as the lower proportion of female executive managers.

The ratio of the median annual total remuneration of all employees (excluding the Management Board) compared to the highest earner came to 1:64.2 in the business year 2024/25.

The median remuneration represents the "middle" value for remuneration: 50% of employees earn less, 50% earn more. Unlike the average, the median is not distorted by outliers at the top or bottom and is therefore considered a reliable metric for income comparisons.

In addition to the fixed gross salary, variable salary components, and the values of benefits in kind (company car; company apartment, voluntary insurance) are also included in the total remuneration.

An approximation method was used to determine the Group median. For Austria, the data is available in disclosed by each company in line with ESRS requirements due to the central payroll accounting. For voestalpine companies abroad, the decentralized payroll accounting systems do not permit central documentation of total remuneration paid per person. A preliminary validation of the approximation method with selected companies abroad demonstrated that the difference between an exact calculation and approximation is economically insignificant.

S1-17 – Incidents, complaints, and severe human rights impacts

Whistleblowers who wish to report compliance violations or human rights violations can submit reports either anonymously or by stating their name. When a whistleblower discloses their name, this makes it possible to pursue the matter at hand together with a targetable, traceable approach. In line with the Code of Conduct, such reports can be submitted to an employee's direct supervisor; the responsible legal or HR department, or the executive management of the respective Group company. Central reporting contact points have also been set up. These include the Group Compliance Officer or one of the divisional compliance officers, the Group Human Resources Department of voestalpine AG, and a human rights officer at voestalpine AG. Upon request, whistleblowers are ensured of absolute confidentiality. When a report is received, it is forwarded promptly to the responsible departments for review.

Since 2012, it has also been possible to send reports on a web-based whistleblower system. The whistleblower system protects the anonymity of whistleblowers if they do not wish to disclose their identity. The system also permits anonymous two-way communication with whistleblowers.

In the business year 2024/25, 24 reports were received through the established reporting channels. Fifteen cases were reported through the whistleblower system and three cases via the human rights e-mail addresses humanrights@voestalpine.com and menschenrechte@voestalpine.com. Six cases were reported by email to the Group Compliance Officer. Each case was assessed and dealt with. Of the 24 cases, seven can be classified as discrimination in the form of harassment, micromanagement, and inclusion. Six cases concern a lack of appreciation, four cases were reported due to dismissal, and seven cases concern general complaints. In one case out of the four dismissals, legal proceedings were initiated. In the business year 2024/25, there were no fines or compensation payments levied, and the legal proceedings are still ongoing. None of the 24 reports received involved any form of human rights violations. In the business year 2024/25, no fines or compensation payments were made on the basis of human rights violations.

More detailed information on the **whistleblower system** can be found in chapter G1-1 Corporate culture and business conduct policies.

OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the metrics used, description of the assumptions and methodology
S1-6 Characteristics of the undertaking's employees	50a	Employees by gender	Number of own staff (headcount) by gender, including apprentices and non-guaranteed hours employees, excluding interns (during summer breaks or as part of school programs), freelance contractors, diploma students/PhD students
S1-6 Characteristics of the undertaking's employees	50a	Employees by country	Number of own staff (head count) by country, excluding apprentices and non-guaranteed hours employees, excluding interns (during summer breaks or as part of school programs), freelance contractors, diploma students/PhD students. Only Germany and Austria included
S1-6 Characteristics of the undertaking's employees	50b	Employees by type of contract and gender	Distinction between permanent contracts, fixed-term contracts, and non-guaranteed hours employees (e.g., casual workers, zero hours contracts)
S1-6 Characteristics of the undertaking's employees	50c	The total number of employees who have left the undertaking and the rate of employee turnover	Total number of own staff (excluding apprentices) who left the company voluntarily (termination by employee), by mutual agreement, as a result of termination by the employer, retirement, due to occupational disability, or death (excluding transfers to another voestalpine company). Average annual values as of March 31 of the prior year + March 31 of the current BY
S1-8 Collective bargaining coverage and social dialogue	60a	Collective bargaining coverage for employees	Collective agreement coverage in percent = number of employees covered by a collective agreement (headcount)/total number of employees (headcount). Collective agreements are defined as "any written agreement on terms and conditions of employment concluded between an employer, a group of employers, or one or more employer organizations on the one hand, and one or more representative employee organizations (trade unions) on the other hand"
S1-8 Collective bargaining coverage and social dialogue	60b	Collective bargaining coverage on a country-by-country basis (EEA countries)	The number of different collective agreements in the EEA to be determined in accordance with the requirement only relates to the voestalpine companies in Austria and Germany. Both countries each account for > 10% of the total number of employees
S1-8 Collective bargaining coverage and social dialogue	63a	Coverage by worker's representatives on a country-by-country basis	Workers' representatives refer to: i. Trade union representatives, designated, or elected by trade unions or by members of such unions in accordance with national legislation and practice ii. duly elected representatives, namely representatives who are freely elected by the workers of the organization, not under the domination or control of the employer in accordance with provisions of national laws or regulations, or of collective agreements, and whose functions do not include activities which are exclusively reserved by the trade unions in the country concerned and the existence of which is not used to undermine the position of the trade unions concerned or their representatives

Where applicable: description of the sources of measurement uncertainty	Resulting degree of accuracy	External validation	Where applicable: planned actions to improve accuracy
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the preparation and description of the metrics used, description of the assumptions and methodology
S1-9 Diversity metrics	66a	Gender distribution at the top management level	The top management level is defined as the Management Board of voestalpine AG and the executive management of the divisions' lead companies
S1-9 Diversity metrics	66b	Age structure of employees	Total own workforce as of March 31 (excluding apprentices), divided into age groups: 1) < 30 years old, 2) 30 – 50 years old, and 3) > 50 years old
ESRS S1-10 Adequate wages	§ 70	If not all its employees are paid an adequate wage in line with applicable benchmarks, the undertaking shall disclose the countries where employees earn below the applicable adequate wage benchmark and the percentage of employees that earn below the applicable adequate wage benchmark for each of these countries.	In accordance with the Code of Conduct of voestalpine, chapter 5, "Social Responsibility," states the following obligation under the heading "Compensation": employees must be compensated in accordance with applicable legal regulations and collective agreements, and this compensation must be sufficient to meet the basic needs of both employees and their families and to provide them with a decent standard of living. Compliance with the Code of Conduct is mandatory for all companies in which voestalpine AG directly or indirectly holds at least 50% of the share capital or over which it exerts control in another manner.
S1-14 Health and safety metrics	88a	Percentage of workers covered by the health and safety management system	Total of employees in manufacturing companies > 30 waged employees / total of employees in companies > 30*100
S1-14 Health and safety metrics	88b	Number of deaths due to work-related injuries and illnesses	Total fatalities » after fatal accidents at work and » after work-related ill-health (only from 2nd reporting year onward, due to transitional provision)
S1-14 Health and safety metrics	88c	The number and rate of recordable work-related accidents	Is calculated based on LTIFR (lost time injury frequency rate: indicates the frequency of accidents based on the number of reportable workplace accidents entailing more than three sick days per million hours worked. The scope of the report covers all companies with personnel
S1-16 Remuneration metrics	97a	Gender pay gap, defined as the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees	This metric is calculated on the basis of the gross earnings (fixed + variable) paid during the BY and any benefits in kind, per male and female employee. Fixed remuneration is defined by basic salary, allowances, premiums, paid overtime, fringe benefits, special payments, and pension benefits. Variable remuneration is defined by success premium, target premium, and other premiums. Benefits in kind include company cars, company housing, and voluntary insurance.
S1-16 Remuneration metrics	97b	Ratio of the annual total remuneration of the highest paid individual to the median annual total remuneration for all employees	This metric is calculated on the basis of the gross earnings (fixed + variable) paid during the BY and any benefits in kind, per male and female employee. Fixed remuneration is defined by basic salary, allowances, premiums, paid overtime, fringe benefits, special payments, and pension benefits. Variable remuneration is defined by success premium, target premium, and other premiums. Benefits in kind include company cars, company housing, and voluntary insurance.

Where applicable: description of the sources of measurement uncertainty	Resulting degree of accuracy	External validation	Where applicable: planned actions to improve accuracy
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
–	High	None	–
Limited—mapping of the data in the companies via Safety Webtool	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–
Limited—data represents the individual companies	High	None	–

ESRS disclosure requirement	Para-graph	Datapoint/metric	Basis for the preparation and description of the metrics used, description of the assumptions and methodology
S1-17 Incidents, complaints, and severe human rights impacts	103a	The total number of reported incidents of discrimination, including harassment, in the reporting period	Number of incidents reported through the Group channels (whistleblower system, email address for the Group Human Rights Officer (Group Sustainability), and by email to the Group compliance contact point (Legal, Investments, and Compliance), or Group HR management.
S1-17 Incidents, complaints, and severe human rights impacts	103b	Number of complaints received through channels from own workforce (including grievance mechanisms)	Number of incidents reported to the Group Compliance Officer, Head of Group Sustainability, and Head of Group Human Resources outside of established Group channels.
S1-17 Incidents, complaints, and severe human rights impacts	103c	The total amount of significant fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed above	Litigation Report containing a list of human rights violations and discrimination including, sexual harassment, subject to court or authority proceedings as of March 31, 2025
S1-17 Incidents, complaints, and severe human rights impacts	104a	Number of severe human rights incidents in connection with workers	Number of severe human rights incidents in connection with workers reported using reporting channels set up by the Group in accordance with point 7 of the voestalpine Code of Conduct.
S1-17 Incidents, complaints, and severe human rights impacts	104b	Total amount of fines, sanctions, and compensation payments related to severe human rights incidents concerning the workforce and reconciliation of the monetary amounts with the most decisive amount stated in the financial statements	Total fines and damages related to severe human rights incidents involving voestalpine's own workforce based on the list of human rights violations and discrimination including, sexual harassment, subject to court or authority proceedings included in the Litigation Report as of March 31, 2025.

Where applicable: description of the sources of measurement uncertainty	Resulting degree of accuracy	External validation	Where applicable: planned actions to improve accuracy
Whistleblower system, other reporting channels in accordance with Code of Conduct	High	None	–
Other reporting channels according to Code of Conduct or direct report to managers	High	None	–
Limited	High	None	–
Inadequate forwarding of reports: When someone who receives a report fails to forward it to the responsible Group entity, the case is not recorded across the Group	High	None	–
–	High	None	–

ESRS S2 WORKERS IN THE VALUE CHAIN

voestalpine sources a wide range of materials, products, and services from a large number of suppliers around the globe. It supplies its products—mostly semi-finished products—to companies from various sectors and countries. The analysis and management of indirect impacts along the value chain remains primarily focused on the upstream sector, specifically on the supply chain.

The purchasing principles are based on the Group Strategy 2030+ and the sustainability strategy. The aim is to minimize (potential) negative impacts in the supply chain and associated risks for the company.

As part of its supply chain management, voestalpine documents social and environmental impacts associated with the activities of suppliers—including potential adverse affects on their workforce. The company adopts a risk-based approach that takes into account sector-specific and country-specific

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Worker rights and conditions in the value chain	! Financial claims and loss of reputation relating to potential labor exploitation in the supply chain (direct payments, in particular due to CSDDD; indirect losses due to poorer sustainability ratings)	Potential labor exploitation within voestalpine's global supply chain carries the risk of financial claims, such as sanctions (e.g., due to CSDDD), as well as reputational damage

risks. As part of preparations for the Corporate Sustainability Due Diligence Directive (CSDDD) requirements, the current due diligence process is to be continuously expanded, and a Group-wide due diligence management system is to be implemented. Violations of labor or human rights—child or forced labor, for example—may result in financial risks and reputational damage. These risks have increased: on the one hand due to stricter legal requirements arising from the Supply Chain Due Diligence Act (LkSG) and the planned EU Directive CSDDD, and on the other hand due to higher demands voiced by stakeholders with regard to transparency and responsibility.

Violations may result in sanctions, reputation damage, and the consequent loss of customers. This risk has been classified as material as part of the double materiality assessment (see ESRS 2, IRO-1 disclosure). For an overview of all material IROs, see SBM-3 in chapter ESRS 2. The following table provides specific information on SBM-3:

Impact on strategy and business model	Value chain	Time horizon	Affected stakeholders	Key
Building resilient and sustainable supply chains	>>>	●●●●	Workers in the supply chain, local communities	<ul style="list-style-type: none"> ● Actual positive impact ● Actual negative impact ○ Potential positive impact ○ Potential negative impact + Opportunity ! Risk >>> Upstream >>> Own operations >>> Downstream ●○○○ < 1 year ○●○○ 1–5 years ○○●○ 5–10 years ○○○● 10+ years
Increased risk management			Suppliers	
Strategic selection of partnerships			Legislators	
			Local, national, and international authorities	

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

S2-1 – Policies related to value chain workers

As an undertaking, voestalpine is committed to respecting human and labor rights throughout its value chain. This obligation applies not only to its own companies but also to its business partners. Requirements for voestalpine companies and business partners are laid down in the mandatory Code of Conduct for Business Partners (CoC-BP), which together with the Due Diligence User Manual, the Human Rights Policy, the Group Procurement Policy, the General Terms and Conditions of Purchase (GPO), and the Sustainable Supply Chain Roadmap forms the basis for responsible cooperation and the fulfillment of due diligence in the value chain.

These voestalpine policies for reducing (potential) negative impacts in the supply chain take into account both legal requirements and international frameworks such as the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, the International Charter of Human Rights, and the UN Convention against Corruption.

The table below lists the main internationally recognized frameworks for the implementation of human rights and environmental due diligence frameworks with which the specified policies are consistent.

OVERVIEW OF INTERNATIONALLY RECOGNIZED HUMAN RIGHTS DUE DILIGENCE FRAMEWORKS

Organization	Guideline	Details
United Nations (UN)	UN Guiding Principles on Business and Human Rights (UNGPs)	<ul style="list-style-type: none"> » Basic framework for corporate responsibility and human rights » Guidelines for undertakings, governments, and civil society in their efforts to prevent and manage the risk of negative impacts on human rights
International Labor Organization (ILO)	Declaration on Fundamental Principles and Rights at Work	<ul style="list-style-type: none"> » Competent body for the establishment and respect of international labor standards and the promotion of fundamental rights at work
Organization for Economic Cooperation and Development (OECD)	OECD Due Diligence Guidance for Responsible Business Conduct	<ul style="list-style-type: none"> » Provides practical guidance on key topics such as climate change, biodiversity, technology, business integrity, and supply chain due diligence » Refers to other international standards and to international commitments and regulations (e.g., the 2030 Agenda for Sustainable Development and the Paris Agreement) » Represents a common understanding between governments and stakeholders of the due diligence framework for responsible business conduct

The Code of Conduct for Business Partners (CoC-BP) and the voestalpine General Conditions of Purchase, which apply to all suppliers, set out a number of criteria for promoting sustainable sourcing and, in particular, ensuring human rights are respected. Any deviation from or failure to comply with internationally recognized frameworks, such as the UN Guiding Principles on Business and Human Rights or the ILO Declaration on Fundamental Principles and Rights at Work, can be reported using the established grievance process.

Due to increased legal requirements and the associated reporting obligations, voestalpine standardized its approach to the obligation to prove compliance with human rights and environmental standards for all purchasing activities in 2024 and set forth corresponding requirements in its Procurement Policy. Monitoring compliance with the above-mentioned international frameworks therefore also takes place on the basis of the Group's Procurement Policy.

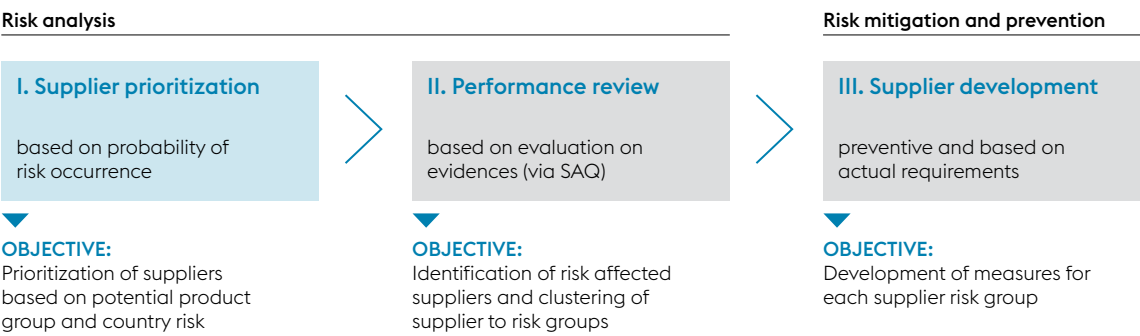
The current version of the CoC-BP was adopted by the Management Board of voestalpine at the end of the business year 2022/23. This Code defines voestalpine's principles and requirements, and is designed to ensure that the practices of business partners conform to both voestalpine's values as well as the pertinent laws and regulations. Based on voestalpine's Human Rights Policy and General Code of Conduct, the CoC-BP addresses the following issues, with a particular focus on the concerns of value chain workers, which are outlined in the section entitled "Corporate Social Responsibility."

- » Compliance and responsible business conduct
 - Compliance with laws
 - Prohibition of active and passive corruption
 - Prohibition of bribery (e.g., sending gifts to employees)
 - Money laundering
 - Fair competition
 - Protection of information, intellectual property, and data
 - Trade restrictions and sanctions
- » Social responsibility
 - Respect for human rights and working conditions
 - Prohibition of child labor
 - Prohibition of forced and bonded labor, human trafficking, and modern slavery
 - Collective bargaining and the right to freedom of association
 - Diversity, equal opportunity, and prohibition of discrimination
 - Compensation and working hours
 - Health and safety in the workplace
 - Training of security staff
 - Local communities and indigenous peoples
- » Environment and climate change mitigation
 - Carbon footprint
- » Supply chain management
 - Raw materials and source minerals
- » Reporting of misconduct
- » Cooperation and participation

Business partners are required to inform their employees and direct suppliers that they can also report wrongdoing and violations of CoC-BP requirements using the voestalpine whistleblower system.

As a Group-wide directive, the Due Diligence User Manual governs the due diligence procedures in supply chain management and outlines measures for awarding contracts in procurement. Supply chain management at voestalpine follows a risk-based approach. The identification, assessment, and prioritization of risks is based on the OECD guidelines for fulfilling the due diligence requirements for responsible business conduct. This approach ensures that resources are employed in a targeted manner and that the most important and urgent issues are addressed first. In practice, this risk-based approach is implemented in a three-stage process (see figure below). In the first step, supplier prioritization, any risk exposure of suppliers on the basis of country and product group-specific risks is identified. This analysis and categorization must be carried out every year for all active suppliers, including those that were added as new suppliers in the year in question. In the second step, performance review measures are conducted for all suppliers previously classified as high or medium risk, in order to understand their individual sustainability performance and specify the actual risks. The third step aims to achieve continuous supplier development to improve their sustainability performance and awareness of their responsibility with regard to human rights and the environment, and ultimately to avoid and mitigate risks. Here too, action is based on the actual requirements.

RISK-BASED APPROACH FOR SUSTAINABLE SUPPLIER MANAGEMENT



The analysis of product group-specific risks focuses on product groups that are purchased on a regular basis by voestalpine and that are associated with potential sustainability risks. Sustainability risks are defined as potential violations of laws and guidelines on human rights and environmental protection (see table below). This also includes the risk of potential violations of human and labor rights that may affect workers in the supply chain. These human rights risks are at the heart of the analysis and are summarized in the table below.

RELEVANT TOPICS FOR RISK ASSESSMENT

Relevant risks in relation to human rights	<p>Human rights risks arising from the characteristics of the industry, its activities, products, and manufacturing processes, including</p> <ul style="list-style-type: none"> » Child labor » Forced labor » Non-compliance with occupational health and safety » Disregard for freedom of association » Unequal treatment of employees » Failure to pay a reasonable living wage » Deployment of security forces on site when the prohibition of torture or the freedom of association are violated or when life and limb are endangered » Impairment of people's livelihoods through soil contamination, water, and air pollution, general emissions, excessive water consumption, and unlawful displacements, and land confiscation, for example through the establishment of new production facilities
Relevant environmental risks	<p>Relevant environmental risks include:</p> <ul style="list-style-type: none"> » Use of mercury and treatment of mercury waste » Production and use of persistent organic pollutants (POPs) » Environmentally harmful treatment, collection, storage, and disposal of POP waste » Export and import of hazardous substances » Other risks that need to be taken into account due to regulatory requirements (e.g., the EU Supply Chain Directive) include CO₂ emissions

The country-specific risk assessment is carried out using public indices that encompass governance and sustainability. Two widely available sources are used by voestalpine to this end: the Worldwide Governance Indicators (source: World Bank) and the CSR Risk Check (source: MVO Nederland). A total of 213 countries and territories are covered by these indices. The combination of the two indices results in an overall risk assessment for each country and region. The following table shows the result of this risk assessment in the business year 2024/25. The data was based on all active suppliers in the business year. Internal value-added orders were not taken into account.

OUTCOME OF THE RISK ASSESSMENT 2024/25

	Percentage of total suppliers (%)
Vulnerable suppliers	
Suppliers from potentially at-risk product groups	19.0
Suppliers from potentially at-risk countries	13.0
Suppliers from potentially at-risk product groups in potentially at-risk countries	3.0

On the basis of the initial risk assessment, voestalpine specifically requests additional evidence from business partners at risk to verify the extent to which they meet the requirements of the CoC-BP. This takes place in the form of a Supplier Assessment Questionnaire (SAQ).

Tasks, responsibilities, strategies, management systems, and performance indicators (KPIs) related to the content of the CoC-BP are requested and reviewed by voestalpine. If required, voestalpine assists its business partners with implementing the requirements. Where necessary, training for suppliers or on-site visits are carried out in order to improve their understanding and ensure the implementation of effective improvement measures. The cooperation and participation of the business partners is required in this regard. voestalpine reserves the right to take appropriate action in the event of violations and an unwillingness to cooperate on the part of suppliers, which may ultimately lead to suspension or termination of the supply relationship.

A user-friendly IT system is used to collaboratively communicate with suppliers to collect their responses, analyze the questionnaires, and draw up action plans.

POLICY OVERVIEW

IROs addressed	Policy	Core content	Scope of the policy	Responsibility and monitoring	Other comments
Financial claims and loss of reputation relating to potential labor exploitation in the supply chain (direct payments, in particular due to CSDDD; indirect losses due to poorer sustainability ratings)	Code of Conduct for Business Partners	Commitment to respect human and labor rights throughout the value chain	Upstream value chain	Head of the Corporate Legal Department	» 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
		Consideration of the UN Guiding Principles on Business and Human Rights (UNGPs), Declaration on Fundamental Principles and Rights at Work, and the OECD Due Diligence Guidance for Responsible Business Conduct	Downstream value chain to a partial extent (excl. use by customers, self-pickups)	Monitoring and compliance regulations: Compliance organization	» 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 multiple languages on the intranet and website. https://www.voestalpine.com/group/en/group/compliance
	Due Diligence User Manual	Group-wide guideline to describe the due diligence processes in supplier management (supplier onboarding, Supplier Assessment Questionnaire (SAQ), supplier evaluation, and on-site visits)	Upstream value chain	Procurement board	Consideration of stakeholder analysis in policy
			Downstream value chain to a partial extent (excl. use by customers, self-pickups)		Internal communication to all users
	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	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)	Head of Group Sustainability	Available on the website
			All production companies		
			Own workforce (employees and non-employees)		
		Commitment to the right to collective bargaining and freedom of association, compliance with legal working regulations, the abolition of child, forced, and compulsory labor as well as human trafficking and modern slavery, the elimination of discrimination, and other human rights issues	Upstream value chain (business partners in the upstream value chain)		

IROs addressed	Policy	Core content	Scope of the policy	Responsibility and monitoring	Other comments
Financial claims and loss of reputation relating to potential labor exploitation in the supply chain (direct payments, in particular due to CSDDD; indirect losses due to poorer sustainability ratings)	Procurement policy	Ensures the presence of binding framework conditions for procurement and generally governs procurement requirements and procedures	Complete coverage of the upstream value chain	Board of Procurement	Consideration of stakeholder analysis in policy
		Includes principles for sustainable procurement	Partial coverage of own operations		Communication to procurement@voestalpine.com
			Partial coverage of the downstream value chain (excl. use and self-pickup)		
	General Terms and Conditions of Purchase	Pre-formulated contractual terms that serve as the basis for contract agreements, including establishing criteria to promote sustainable procurement and respect for human rights	Upstream value chain	Board of Procurement	Consideration of stakeholder analysis in policy
			Downstream value chain to a partial extent		
	Sustainable supply chain roadmap	Strategic plan with measurable milestones to ensure transparency and sustainability in the supply chain	Upstream value chain	Board of Procurement	Consideration of stakeholder analysis in policy
			Downstream value chain to a partial extent		
					Communication to procurement@voestalpine.com

S2-2 – Processes for engaging with value chain workers about impacts

As an undertaking, voestalpine does not currently have a standardized process in place for engaging with value chain workers, apart from the whistleblower system, which can also be used by value chain workers. A corresponding procedure is currently being developed in preparation for the requirements of the CSDDD. In the absence of a formal procedure, value chain workers will be engaged in the event of an incident, such as suspected violations.

S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns

EXISTENCE OF A GRIEVANCE PROCESS

In addition to the risk-based due diligence process, voestalpine has set up a whistleblowing system on its website for raising grievances and, if necessary, takes situation-specific action to remedy and compensate for any violations. The whistleblower system is available not only to internal employees, but also to workers in the value chain and other stakeholders groups to report possible violations of legal requirements or internal guidelines—such as voestalpine's Code of Conduct for Business Partners (CoC-BP).

Business partners also undertake, over and above the General Terms and Conditions of Purchase (GPO) and the Code of Conduct for Business Partners (CoC-BP), to inform their own employees and direct suppliers about the option of using the voestalpine whistleblower system. The system thus helps to identify potential negative impacts on value chain workers.

Unless there is a legal obligation to set up a whistleblower system, voestalpine recommends that its business partners establish an appropriate system that allows both open and anonymous reporting.

The whistleblower system has established itself as a trusted point of contact within the voestalpine workforce, and is actively used by whistleblowers. In light of its high level of acceptance and the effectiveness of the remediation measures, there are plans to inform the workforce in the value chain of its availability, allowing them also to raise grievances or to point out irregularities. All reports are treated confidentially.

No further action is currently being pursued to inform value chain workers about the ways in which they can report concerns or complaints. At present, no assessment takes place to determine whether value chain workers are familiar with and trust these grievance mechanism structures or practices. voestalpine is working to establish a general mechanism for working with value chain workers to strengthen dialogue and communication in the long term.

For more information on the whistleblower system, see chapter G1 Business Conduct under G1-1 Corporate culture and business conduct policies.

In the business year 2024/25, no reports of violations pertaining to workers in the value chain (e.g., labor and human rights violations) were received via the whistleblower system or other communication channels.

SUPPLIER DEVELOPMENT

The engagement and active participation of suppliers and business partners is key to ensuring compliance with the voestalpine Code of Conduct for Business Partners. The due diligence process specifically helps vulnerable suppliers with inadequate sustainability performance to resolve identified shortcomings and taking corrective action. Following up on the performance evaluation helps to better understand and implement necessary changes. This process forms part of voestalpine's broader Supplier Development Program, which aims to continuously improve sustainability performance.

As shown in the table below, supplier training, capacity building, cooperation, and engagement complement suppliers' sustainable development activities.

OVERVIEW OF SUPPLIER DEVELOPMENT ACTIONS

Supplier training and capacity building	Helping suppliers improve their practices with training and advice. This may include training on human rights, labor standards, environmental management, and prudent business conduct. Capacity building involves, for example, helping to solve specific issues faced by suppliers through the provision of expertise or supporting with the implementation of sustainable practices
Collaboration and engagement	Collaboration with stakeholders, including suppliers, civil society organizations, industry associations, and government agencies, is crucial when it comes to addressing systemic problems and promoting positive change

S2-4 – Taking action on material impacts and approaches to managing material risks, and pursuing material opportunities related to value chain workers and the effectiveness of those actions and approaches

Key policies related to value chain workers are implemented as part of the CSDDD project realization. The expansion of the due diligence process, including a change policy for procurement governance and supplier screening, is to be actively promoted.

The conditions required for the expansion of the due diligence process, which was previously limited to companies subject to the Supply Chain Due Diligence Act (LkSG), to the whole group and all suppliers are currently being established by voestalpine. A key prerequisite for the Group-wide management of due diligence is the introduction of a comprehensive database that permits systematic risk analysis and management. In a second step, the global harmonization and consolidation of due diligence actions takes place in order to ensure uniform implementation within the Group.

One starting point is voestalpine's existing Supplier Lifecycle Management system. This system involves a multi-stage process to establish, maintain, and develop relationships with suppliers. The focus is on the following aspects:

- » Ensuring supplier and delivery quality
- » Preventing and managing risks and threats
- » Establishing a transparently assessed pool of qualified suppliers
- » Complying with ESG and sustainability criteria

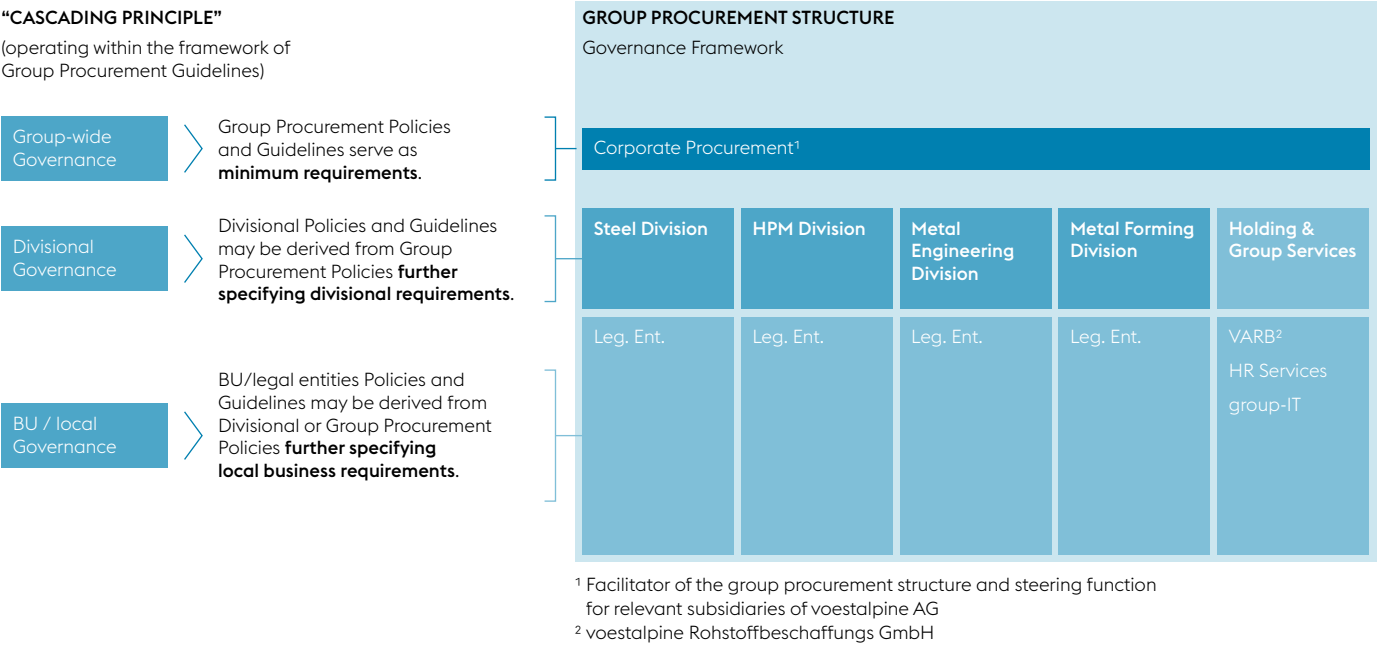
New suppliers are added to the database on the basis of risk and on a gradual basis. Supplier development is evaluated using a conventional supplier assessment. All relevant suppliers are classified as A, B, C, or D suppliers once a year. Depending on the product group, different criteria are included in the evaluation, such as environmental and quality management, innovative strength, flexibility, and adherence to deadlines. A and B suppliers enjoy preferential treatment in the procurement process.

C and D suppliers are used to define targeted corrective actions that are to be implemented within a defined period of time. The corresponding implementation of the corrected actions is reviewed, for example, in follow-up assessments or in correspondence with the responsible procurement functions.

Supply chain due diligence obligations and the associated actions to prevent negative impacts on workers are to be implemented within the existing procurement structures. Human and organizational resources are continuously available to assist with this process. Resources earmarked specifically for this undertaking are not currently reported separately.

A clearly defined governance framework has been established for corporate procurement (see figure below), which regulates the dissemination principles and responsibility for implementation within the organization.

GOVERNANCE FRAMEWORK FOR THE GROUP PROCUREMENT STRUCTURE



The executive management of the respective Group company is responsible for implementing Group-wide and divisional procurement guidelines, adjusting them if necessary to account for local circumstances or legal requirements, and for creating the necessary organizational framework. In addition, each Group company must contain written documentation of the form in which procurement is structured and regulated.

SUPPLIER ASSESSMENT QUESTIONNAIRE (SAQ)

Suppliers classified as potentially high or medium risk are subject to further risk assessment conducted in the form of the Supplier Assessment Questionnaire (SAQ). The SAQ reflects the requirements outlined in voestalpine's CoC-BP and is designed to:

- » Identify actual human rights and environmental risks
- » Obtain information and evidence on compliance with the voestalpine CoC-BP
- » Determine targeted supplier development actions including further reviews of supplier risk such as on-site audits.

The SAQ is used to collect information on the following topics:

- » Compliance
- » Human rights and working conditions
- » Environmental protection and climate change mitigation
- » Management of the supply chain and reporting of misconduct

The structure of the questionnaire is based on the requested information and evidence (see table below). This includes: policy documents (e.g., guidelines), documentation on existing management systems (e.g., various ISO certifications), communication information (content and channels), KPIs, and other information on specific issues (e.g., the sourcing of conflict minerals and climate targets).

SAQ STRUCTURE WITH SAMPLE QUESTIONS AND THEIR PURPOSE

Topic	Sample question	Purpose
Policy/guidelines	Does your organization have a formal guideline such as a code of conduct in place that addresses the requirements of voestalpine's Code of Conduct for Business Partners?	Guidelines show that the company is committed to a specific issue and has a policy in place (principles and values, benchmarks, targets, etc.)
Management approach/system	Does your site have an environmental management system in place?	Management systems demonstrate the existence of formal processes
Communication	How do you ensure that your employees are made aware of and comply with your internal guidelines/code of conduct or other guidelines on environmental protection and climate change mitigation?	Communication ensures that the guidelines and procedures are acknowledged, implemented, and observed
KPIs/further information	Has your undertaking set CO ₂ emission reduction targets in its own operations and along the supply chain to work towards achieving the targets of the Paris Agreement (1.5° target)?	Internal KPIs show commitment and verify the implementation of policies

In accordance with the requirements of the Supply Chain Due Diligence Act (LkSG), the voestalpine Group has set up the new role of Human Rights Officer at each affected German voestalpine company. In addition, at Group level, the Head of Corporate Sustainability has been appointed human rights officer of the voestalpine Group.

Another key measure related to value chain workers is the integration of the sustainability topic block into the training program of the Group procurement structure (Purchasing Power Academy). For further information see chapter 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.

OVERVIEW OF ACTIONS

IROs addressed	Action	Core content and expected results
Financial claims and loss of reputation relating to potential labor exploitation in the supply chain (direct payments, in particular due to CSDDD; indirect losses due to poorer sustainability ratings)	CSDDD—Project Implementation	<p>Actions to ensure compliance according to CSDDD by 2028</p> <p>Determination of the necessary organizational requirements (roles, responsibilities, and competencies), in particular for the period after the project phase</p> <p>Expansion of the due diligence process, including the creation and implementation of a change concept with regard to raising awareness within the procurement organization and among suppliers</p> <p>Expected results:</p> <ul style="list-style-type: none"> » CSDDD compliance by 2028
	Supplier Assessment Questionnaire (SAQ)	<p>Supplier questionnaire based on the voestalpine Code of Conduct for Business Partners</p> <p>Request for proof of compliance, human rights, environmental protection, supply chain management, and whistleblower systems</p> <p>Regular evaluation and adaptation to the latest legal requirements</p> <p>Expected results:</p> <ul style="list-style-type: none"> » Fulfilment of regulatory requirements and minimized risk in supply chain » Promotion of transparency in the supply chain
	Integration of the sustainability topic block into the training program of the Group procurement structure (Purchasing Power Academy)	<p>Topic-specific training and online training initiatives on relevant purchasing topics with regard to sustainability (e.g., raising awareness of the Group sustainability strategy, involving suppliers in sustainability measures, Code of Conduct)</p> <p>Offering the Certified Sustainable Procurement Professional external training program</p> <p>Expected results:</p> <ul style="list-style-type: none"> » Increased expertise on sustainability issues in procurement

Time horizon	Scope of the action	Responsibility and monitoring	Significant expenditure (if relevant)	Other comments
April 2025 – March 2028	Upstream value chain Downstream value chain to a partial extent	Board of Procurement	–	Use of KPIs to monitor the share of sustainable suppliers
Ongoing	Upstream value chain— and downstream value chain to a partial extent—for high-risk suppliers	Board of Procurement	–	Communication to procurement@voestalpine.com
Ongoing	Upstream value chain Downstream value chain to a partial extent All buyers	Board of Procurement	–	Communication to procurement@voestalpine.com

METRICS AND TARGETS

S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The voestalpine Group has initially set itself the target of reviewing at least 70% of its total procurement volume—including 100% of all relevant raw material deliveries—in line with a defined process for the application of established sustainability criteria by the end of the calendar year 2025. By the end of the business year 2024/25, 35% of the additional procurement volume had already been achieved in line with the sustainability criteria.

The aim of verifying the procurement volume using sustainability criteria is to prevent (potential) negative impacts on value chain workers, for example in the form of violations of fundamental labor rights.

TARGET: INCREASING THE SHARE OF SUSTAINABLE SUPPLIERS

KPI	Share of suppliers that meet the voestalpine sustainability criteria	
UNIT	Procurement volume (active suppliers)	
BASE VALUE	STATUS	TARGET VALUE
n.a. 2021	35% of the procurement volume Business year 2024/25	100% 2029
Responsibility and monitoring	Board of Procurement	
Scope	Upstream value chain	
Stakeholders	Active suppliers	
Addressed IRO	Financial claims and loss of reputation relating to potential labor exploitation in the supply chain	
Reference to policy	All policies from S2	

The aim behind this is to reduce risks related to compliance, hazards, or human rights infringement, and environmental impacts while achieving the specified sustainability criteria.

The review includes assessing whether suppliers meet the voestalpine sustainability criteria (e.g., acceptance of the Code of Conduct for Business Partners). The sustainability criteria were determined and pursued on the basis of internal analyses and regulatory requirements. Direct engagement of value chain workers or their representatives is not yet envisaged.

A strategic plan has been consistently pursued in recent business years in an attempt to ensure transparency and sustainability in the supply chain, thereby achieving important milestones (see figure) on the roadmap. The strategic plan is regularly reviewed and, where necessary, adapted.

voestalpine ROADMAP OF SUSTAINABILITY ACTIVITIES 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)

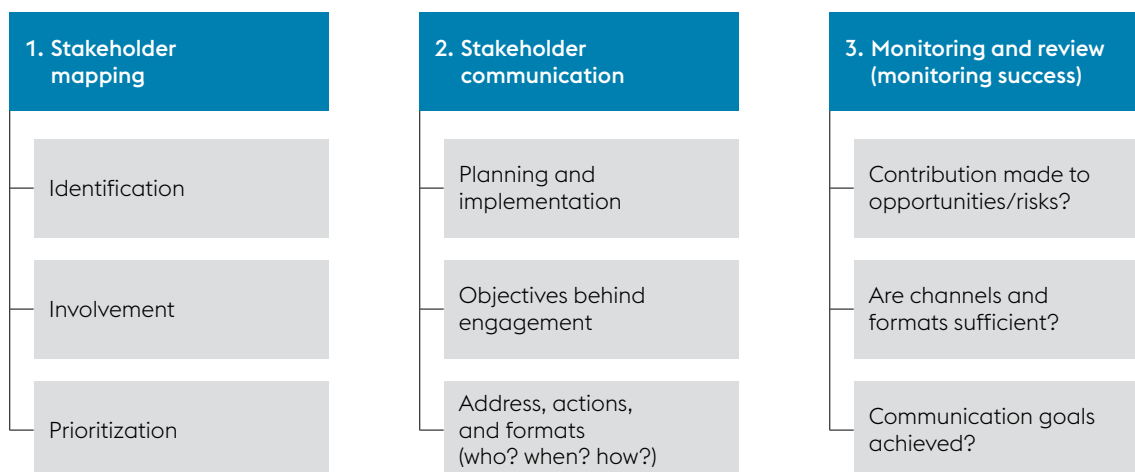
This code sets out clear and transparent rules for the voestalpine's lobbying activities. voestalpine's Lobbying Code of Conduct governs dealings with stakeholders in Austria as well as in Europe and on a global scale in accordance with the Austrian Lobbying and Advocacy Transparency Act.

» 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

GOVERNANCE INFORMATION

ESRS G1 BUSINESS CONDUCT

Responsible business conduct forms the basis for lasting success and social trust. The focus in this regard is on key issues such as business ethics and upholding a value-based corporate culture characterized by integrity, transparency, and active anti-corruption and bribery practices. The protection of whistleblowers plays just as important a role as the respectful and fair treatment of all stakeholders. Clear principles have also been established to govern suppliers relationships: Fair payment practices and a dialogue based on partnership—especially with small and medium-sized enterprises—are essential. This commitment is complemented by responsible and comprehensible exercise of political influence, involving transparent lobbying activities. When combined, these aspects form the basis of modern business conduct, which is actively practiced and continuously developed at voestalpine.

The following table provides specific information on SBM-3:

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Corporate culture	● Shared values at voestalpine	voestalpine maintains a respectful corporate culture that values innovation, diversity, self-determination, and personal responsibility
Ethical business conduct	● Upholding business ethics	voestalpine is committed to the principles and requirements of ethical business conduct set out in its Code of Conduct and other Group-wide policies
	! Violation of compliance guidelines and white-collar crime	Violation of the Code of Conduct, other Group-wide policies, and laws, such as competition law

	Impacts on strategy and business model	Value chain	Time horizon	Affected stakeholders
	Strengthens the employer brand and employee motivation	>>> Group-wide	●●●●	» Employees
	Strengthens innovative strength			
	Strengthens the employer brand and employee motivation	>>> Global	●●●●	» Employees » Business partners
	Promotes stable partnerships and reduces legal risks			
	Risk of losing trust among stakeholders	>>> Global	●●●●	» Employees » Business partners
	Increased risk management			

Key

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

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

G1-1 – Corporate culture and business conduct policies

CORPORATE VALUES

Shared values act as a strong anchor that provides security, support, and orientation. They strengthen the corporate culture and sense of unity. In addition, binding corporate values support the implementation of the Group strategy and provide the basis for specific rules and operational guidelines.

ENTREPRENEURIAL MINDSET

We are guided by success.

Our approaches and actions are entrepreneurial. Our passion for solutions and innovation provides the basis for joint action. We are team players primed for success because we always seek the best possible outcome together.

In so doing, we always work to our customers' benefit while also considering our other stakeholders. We strive for excellence in our actions—and let it be our guide.

THE PRACTICE OF RESPECT

We build upon our diversity as a team.

We are respectful and fair toward each other, our customers, and our partners.

We trust each other and align with values common to us. We create a motivating work environment infused with team spirit, where respectful cooperation is at the core of our actions, day in and day out.

SUSTAINABLE PRACTICES

We perform our jobs responsibly.

In our daily work, all of us act autonomously within defined responsibilities, demanding and fostering high degrees of individual responsibility. We remain curious and do not rest on our laurels; instead, we constantly evolve together to bring about continual improvements. Our actions are sustainable, proactive, and forward looking.

It is our corporate culture that makes us who we are: One step ahead.



VALUES
CULTURE



ENTREPRENEURIAL
MINDSET



THE PRACTICE OF
RESPECT



SUSTAINABLE
PRACTICES

The corporate culture significantly influences the success of a company by shaping the values and behaviors of employees and promoting cooperation. The voestalpine culture is continually being refined to strengthen our Group-wide identity in this sense.

Corporate culture can be indirectly evaluated through employee surveys by assigning the questions to one or more company values to the greatest possible extent. This allows correlations and conclusions about the company values to be derived. The results of the 2024 employee survey were reported to the Management Board at a board meeting.

The Code of Conduct forms the foundation of the corporate culture. It sets out the ethical standards and behaviors that voestalpine expects from all employees and reflects the Group's commitment to integrity, transparency, and corporate social responsibility. Since 2013, voestalpine has supported the UN Global Compact (UNGC) with its ten principles that address labor standards, environmental protection, and the fight against corruption alongside the promotion of human rights. voestalpine is therefore opposed to all forms of corruption, including extortion and bribery.

CODE OF CONDUCT AND COMPLIANCE GUIDELINES BASED ON IT

Our employees are integral to the Group's success and are therefore key to both the trust placed in voestalpine and its reputation. This is precisely why it is important to establish unequivocal principles on matters of ethics and morality in business. The Code of Conduct and the compliance guidelines based on it provide the relevant parameters to that end. By providing guidance to employees in their daily actions and decisions, it shapes the corporate culture by making every employee a role model. The Management Board is explicitly and emphatically committed to both this Code of Conduct and a zero-tolerance policy toward violations thereof.

The Code of Conduct requires voestalpine companies in all countries in which they operate and all their employees to comply with all applicable laws. It also set forth how to handle dealings with stakeholders such as customers, suppliers, employees, and other business partners.

The voestalpine Code of Conduct was enshrined in writing in 2009. It is the result of numerous conversations and discussions at the level of the Management Board as well as among executive management and department heads of the voestalpine Group. It is based on the Group's corporate values and provides the basis for ethically and legally sound conduct on the part of all of the Group's employees. The principles and requirements documented in the Code of Conduct and the Code of Conduct for business partners are rooted in the Human Rights Policy, the UN Guiding Principles (UNGPs) on Business and Human Rights, the principles enshrined in the UN Global Compact (UNGC), the International Bill of Human Rights, and the United Nations Convention against Corruption.

The Code of Conduct and the directives based on it (compliance guidelines) are continuously evaluated and, if necessary, adapted to take into account new social and legal requirements. Most recently for instance, implementation of the EU Directive on protection for whistleblowers and changes required in connection with supply chain management as well as necessary adjustments due to the EU Directive on transparent and predictable working conditions were anchored within the voestalpine Code of Conduct. The Code of Conduct has been published in more than 20 languages and can be downloaded from the Internet: <https://www.voestalpine.com/group/en/group/compliance>

voestalpine AG CODE OF CONDUCT

Compliance and responsible business conduct	Social responsibility
<ul style="list-style-type: none"> » Compliance with laws and other regulations » Competition and antitrust law » Corruption, bribery, and acceptance of gifts » Taxes » Money laundering » Conflicts of interest » Prohibition of abuses of insider information » Data privacy and protection » Trade restrictions and sanctions » Conflict minerals » Secrecy of confidential information » Intellectual property » Protection of corporate property and IT usage » Corporate communications 	<ul style="list-style-type: none"> » Respect for human rights and working conditions » Prohibition of child labor » Prohibition of forced and bonded labor, human trafficking, and modern slavery » Collective bargaining and the right to freedom of association » Diversity, equal opportunities, and ban on discrimination » Remuneration » Working time » Local communities and indigenous peoples » Security personnel » Donations and sponsorships » Workplace safety » Human rights in the supply chain
Environmental protection and climate change mitigation	Reporting misconduct

The Code of Conduct applies to all members of the Management Board, the managing directors, and the non-executive employees of all entities in which voestalpine AG has a direct or indirect interest of at least 50% or which it controls in some other way. As regards all other companies in which voestalpine AG has a direct or indirect stake of at least 25% but does not control them, the Code of Conduct is brought to their attention with the request that they enforce it by having their corporate decision-making bodies recognize it of their own volition.

Any employee who violates laws, regulations, internal guidelines, rules, and instructions, or provisions of the Code of Conduct may be subject to disciplinary measures. Moreover, violations may also have consequences under criminal and/or civil law, e.g., claims to compensation and claims for damages.

voestalpine aims to have the Code of Conduct apply throughout its sphere of influence. Suppliers and consultants are required to comply with the Code of Conduct for Business Partners (see details below) and are called on to respect and observe human rights as fundamental values.

All of voestalpine's business partners are also requested to reasonably promote adherence to the Code of Conduct among their own business partners along the supply chain. Additionally, Group companies are urged to bring the Code of Conduct to the attention of their customers and to strongly encourage them to commit to compliance therewith.

voestalpine AG has adopted several Group guidelines that serve as a helpful tool for employees in applying the Code of Conduct. The compliance rules and regulations associated with the voestalpine Code of Conduct currently comprise the following and can be found on the Intranet:

Business conduct

These guidelines supplement and flesh out the Code of Conduct with respect to issues of corruption, bribery, acceptance of gifts, and conflicts of interest. For example, they regulate the permissibility of gifts, invitations, and other benefits; donations and sponsoring; secondary employment as well as the private purchase of goods and services by voestalpine employees from customers and suppliers. The section entitled Business conduct also addresses the prohibition of political contributions. The voestalpine Group does not allow donations to politicians, political parties, organizations affiliated with political parties, or political front organizations. This does not apply to political precursor organizations that are devoted solely to social issues and have been individually approved by the Management Board of voestalpine AG.

Dealings with brokers and consultants

This guideline provides additional information on the topics of corruption, bribery, and the acceptance of gifts. It defines the procedure to be complied with prior to engaging sales representatives, agents, and other marketing consultants. An objective analysis of business partners' environment and scope of activities before establishing business relationships with them serves to ensure that the business partners also comply with both applicable law and the voestalpine Code of Conduct.

Antitrust law

This guideline describes the prohibition of agreements restricting competition, establishes rules for dealing and interacting with industry associations, professional associations, and/or other sector organizations, and defines particular rules of conduct for employees of the voestalpine Group. Additionally, manuals have been developed with respect to issues of information sharing and benchmarking, procurement alliances, and supplier relationships with competitors, which provide employees with information on these topics from an antitrust perspective.

Compliance manual and compliance violation prevention program

These rules and regulations explain voestalpine's compliance management system and provide information on the Group's compliance strategy and compliance structure. They likewise set forth the responsibilities for processing suspected compliance incidents, such as allegations of corruption or bribery. They also provide information on steps taken to prevent and identify compliance violations as well as on the potential repercussions and sanctions such violations may trigger. Information on the web-based whistleblower system, which allows compliance violations to be reported anonymously, can also be found in these regulations. Further information on the whistleblower system can be found below.

Code of Conduct for Business Partners

These rules and regulations that are directed toward suppliers of goods and services as well as toward brokers, consultants, and other business partners define the principles and requirements for doing business with voestalpine. They were comprehensively revised and expanded in the 2022/23 business year. Among other things, voestalpine requires its business partners to respect and comply with human rights as fundamental values in accordance with the International Bill of Human Rights, the UN Guiding Principles (UNGPs) on Business and Human Rights, and the Core Labor Conventions of the International Labor Organization (ILO). In particular, this applies to the prohibition of child and forced labor; the prohibition of human trafficking in any way, shape, or form; the equal treatment of employees; and the right to employee representation and collective bargaining. Business partners must also undertake to comply with environmental protection standards and to set scientifically verifiable

targets for reducing their CO₂ footprint. In fact, the business partners must abide by their commitments not just in their own sphere of activity; they must also require their own suppliers to act accordingly and must verify compliance with these commitments in the supply chain. The Code of Conduct for Business Partners has been published in several languages and can be downloaded from the Internet: <https://www.voestalpine.com/group/en/group/compliance>

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

voestalpine's Lobbying Code of Conduct regulates dealings with stakeholders in Austria as well as in Europe and internationally in accordance with the Austrian Lobbying and Advocacy Transparency Act in order to provide a clear and transparent framework for lobbying activities. Just as with the general Code of Conduct, the Lobbying Code of Conduct is also binding on all members of the Management Board, the managing directors, and the non-executive employees of all entities in which voestalpine AG has a direct or indirect interest of at least 50% or which it controls in some other way. Whenever lobbying activities are supported by external parties, care must be taken to ensure that the latter also commit to compliance with the present Code of Conduct. The Lobbying Code of Conduct has been published in German and English and can be downloaded from the Internet: <https://www.voestalpine.com/group/en/group/compliance>

MECHANISMS FOR IDENTIFYING, REPORTING, AND INVESTIGATING CONCERNS ABOUT UNLAWFUL CONDUCT

Responsibility and compliance organization

Responsibility for adherence to compliance regulations rests with the individual Group company's management. A compliance system was established in the voestalpine Group to help management fulfil this responsibility and to set up the processes required to that end. Aside from a Group Compliance Officer, a Divisional Compliance Officer has been appointed for each division; additional Compliance Officers are appointed in particular divisional sub-units. The Group Compliance Officer reports directly to the Chairman of the Management Board. The Divisional Compliance Officers report to both the Group Compliance Officer and the respective division heads who are members of the Management Board.

COMPLIANCE ORGANIZATION

voestalpine AG				
Group Compliance Officer				
Steel Division	High Performance Metals Division	Metal Engineering Division	Metal Forming Division	Holding & Group Services
Divisional Compliance Officer	Divisional Compliance Officer	Divisional Compliance Officer	Divisional Compliance Officer	Group Compliance Officer
Compliance officer in larger sub-units	Compliance officer in larger sub-units	Compliance officer in larger sub-units	Compliance officer in larger sub-units	

Group and Divisional Compliance Officers are appointed and dismissed by voestalpine AG's Management Board; the member of voestalpine AG's Management Board responsible for each individual division has a right of nomination with respect to divisional Compliance Officers. Any additional Compliance Officers who may be appointed at the level of divisional sub-units are appointed and dismissed by the respective operating company of that division.

Compliance officers are responsible for the following topics:

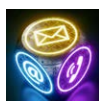
- » Antitrust law
- » Corruption
- » Compliance with capital market regulations
- » Fraud (internal cases of theft, fraud, misappropriation, or embezzlement)
- » Conflicts of interest
- » Special topics assigned to the Compliance organization by the Management Board of voestalpine AG (e.g., in connection with issues related to UN or EU sanctions)

All other Compliance issues—e.g., environmental law, taxes, invoicing, labor law, protection of employees, or data privacy—do not fall under the purview of the Compliance Officers' powers. Other organizational units are responsible for these compliance issues.

In addition to management, the Compliance organization also supports employees in complying with these requirements, including through regular on-site and online training, training, management discussions, and ongoing information initiatives. Awareness campaigns are also conducted regularly to increase awareness of compliance within the Group. More information on training can be found in chapter G1-3 under "Preventive activities."

Whistleblower system

<https://www.bkms-system.net/>



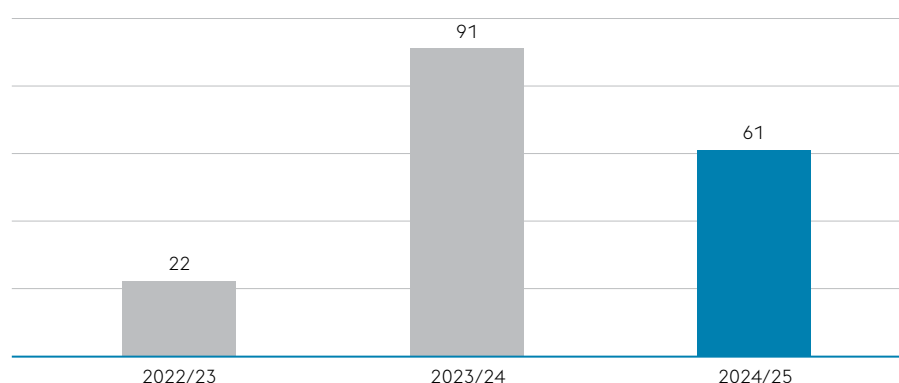
The voestalpine Group encourages all employees who observe any violations, or who have seen activities which they suspect might constitute a violation, to report the occurrence. Pursuant to the Code of Conduct, such reports may be addressed to the individual's direct supervisor; the appropriate legal or human resources department; the management of the respective Group company; the Internal Audit and risk management departments of voestalpine AG; the Group Compliance Officer; or one of the Divisional Compliance Officers. Upon request, whistleblowers are ensured of absolute confidentiality. Employees who report identified violations of laws, the Code of Conduct, or other internal guidelines and regulations will not be subject to reprisals or negative consequences of any kind. This also applies to other persons who contribute important information for the investigation of such misconduct. This provision is in accordance with the applicable law transposing Directive (EU) 2019/1937 ("Whistleblower Directive").

Furthermore, an option to anonymously report violations via a Web-based whistleblower system has been available since 2012. The voestalpine Group relies on the EQS Group's many years of expertise with the BKMS® system, the anonymity of which has been certified by an independent body, in this regard. The BKMS® system can be used by employees and external whistleblowers. The areas for which misconduct can be reported on the whistleblower system were extended in 2022/23 business year to the following:

- » Antitrust, corruption, fraud, conflicts of interest, capital market compliance
- » Discrimination, sexual harassment, bullying, human rights
- » Data privacy and protection
- » Technical compliance, in particular compliance with technical standards and certifications in production processes; IT security
- » Environment
- » Health and safety
- » Violations in other areas

The whistleblower system makes it possible for the appropriate Compliance Officers to communicate with whistleblowers while maintaining absolute anonymity. Since the expansion of reporting options in December 2022, a total of 171 incidents have been reported in different areas. The system has established itself as a trusted point of contact and is widely used. The high level of acceptance shows that employees and other authorized persons actively use the whistleblower system to report grievances or irregularities.

NUMBER OF REPORTS RECEIVED ON THE WHISTLEBLOWER SYSTEM



Information on the various reporting channels—in particular on the whistleblower system—is publicly available both on the intranet and on the voestalpine website at <https://www.voestalpine.com/group/en/group/compliance/reporting-misconduct/>. Employees are also informed about the reporting channels and how reports are processed, and receiving training on how to use the system. Corresponding information is disseminated in email newsletters sent to employees or through posters, as well as at in-person and online compliance training. More information on training can be found in chapter G1-3 Prevention and detection of corruption and bribery under “Preventive activities.”

POLICY OVERVIEW

IROs addressed	Policy	Core content	Scope of the policy	Responsibility and monitoring	Other comments
<p>Values practiced at voestalpine</p> <p>Practiced corporate ethics</p> <p>Violation of compliance guidelines and white-collar crime</p>	Code of Conduct	<p>Basis for all business activities and decisions undertaken by employees of the voestalpine Group</p> <p>Basis for the morally, ethically, and legally sound conduct of all of the Group's employees</p> <p>Based on 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)</p>	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)	<p>Responsibility: Management Board/executive management</p> <p>Monitoring and compliance regulations: Compliance organization</p>	<p>» 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</p> <p>» The Code of Conduct and the directives based on it (compliance guidelines) are continuously evaluated and revised where necessary</p> <p>» Code of Conduct forms the basis for all guidelines arising from voestalpine's compliance regulations</p> <p>» 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)</p> <p>» Available in over 20 languages on the intranet and on the website https://www.voestalpine.com/group/en/group/compliance/</p>
	Code of Conduct for Business Partners	<p>Defines the compliance requirements voestalpine sets for its business partners</p> <p>Ensures that the business practices of business partners are in accordance with voestalpine values, as well as the applicable laws and regulations</p>	Business partners	<p>Responsibility: Management Board/executive management</p> <p>Monitoring and compliance regulations: Compliance organization</p>	<p>» 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</p> <p>» 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)</p> <p>» Available in several languages on the intranet and on the website https://www.voestalpine.com/group/en/group/compliance/</p>
	Business Conduct Policy	Fleshes out the Code of Conduct with respect to issues of corruption, bribery, acceptance of gifts, and conflicts of interest	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)	<p>Responsibility: Management Board/executive management</p> <p>Monitoring and compliance regulations: Compliance organization</p>	<p>» Supplements and fleshes out the Code of Conduct</p> <p>» Available in several languages on the intranet</p>

POLICY OVERVIEW

IROs addressed	Policy	Core content	Scope of the policy	Responsibility and monitoring	Other comments
<p>Values practiced at voestalpine</p> <p>Practiced corporate ethics</p> <p>Violation of compliance guidelines and white-collar crime</p>	Guideline on dealings with brokers and consultants	Contains guidelines for dealings with sales-related business partners, in particular sales representatives, and the business partner check to be carried out in this context before a business relationship is entered into	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: Management Board/executive management Monitoring and compliance regulations: Compliance organization	<p>» Supplements and fleshes out the Code of Conduct</p> <p>» Available in several languages on the intranet</p>
	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	<p>» 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</p> <p>» Continuously evaluated and revised where necessary</p> <p>» Available in German and English on the intranet and on the website https://www.voestalpine.com/group/en/group/compliance/</p>
	Antitrust Policy	Rules of conduct for employees with regard to the ban on agreements and practices that restrict competition along with other aspects in their dealings with associations, professional associations, and other trade organizations Compliance with national and international antitrust legislation	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: Management Board/executive management Monitoring and compliance regulations: Compliance organization	<p>» Supplements and fleshes out the Code of Conduct</p> <p>» Available in several languages on the intranet</p>
	Guidelines on the compliance violation prevention program	These Guidelines specify preventive activities to ensure compliance regulations are upheld derived from the Code of Conduct and the Compliance Guidelines of voestalpine AG	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: Management Board/executive management Monitoring and compliance regulations: Compliance organization	<p>» Supplements and fleshes out the Code of Conduct</p> <p>» Available in several languages on the intranet</p>
	Compliance Policy Manual	Provides information on compliance targets, the compliance strategy, and the structure of the compliance organization at voestalpine	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: Management Board/executive management Monitoring and compliance regulations: Compliance organization	<p>» Supplements and fleshes out the Code of Conduct</p> <p>» Available in several languages on the intranet</p>
<p>Values practiced at voestalpine</p> <p>Practiced corporate ethics</p>	Corporate Governance Code	<p>The Corporate Governance Code provides Austrian stock corporations with a framework for managing and monitoring their companies</p> <p>It serves to establish a system for managing and controlling companies and groups that is accountable and geared to creating sustainable, long-term value</p> <p>Based on the provisions of Austrian stock corporation, stock exchange, and capital market law; the EU recommendations regarding the responsibilities of members of supervisory boards and the compensation of directors; and the OECD Principles of Corporate Governance</p>	Voluntary commitment by voestalpine AG	Management Board and Supervisory Board of voestalpine AG	<p>» External regulatory framework with which voestalpine voluntarily complies</p> <p>» Available on the intranet https://www.corporate-governance.at/kodex/</p>

For this chapter, no measurable targets have been defined in the reporting period in accordance with ESRS 2 para. 81b—nevertheless, the company is continuously pursuing the effectiveness of existing actions and policies. The compliance framework is continuously evaluated and, if necessary, adapted to ensure that it meets current requirements and effectively contributes to minimizing risks. Various procedures are used to track the effectiveness of the compliance management system, in particular audits and the evaluation of the whistleblower system's acceptance.

G1-2 – Management of relationships with suppliers

At voestalpine, procurement is organized in consideration of economic, environmental, and social aspects. It revolves around the central goal of establishing fair, long-term relationships with suppliers, including small and medium-sized enterprises (SMEs). Environmental and social criteria are incorporated into the selection process for suppliers.

In order to enhance supply chain management, voestalpine is currently creating the organizational and procedural bases to gradually extend the existing due diligence process—which has been limited to companies subject to the Supply Chain Due Diligence Act (LkSG) until now—to the whole Group and all suppliers. Compliance with human rights and measures to reduce CO₂ emissions are a particular focus in this regard. For more information on human rights compliance and related actions, see chapter S2 Workers in the value chain.

To ensure financial stability in supply chain—especially for SMEs—voestalpine relies on clear payment terms, digital payment monitoring systems, and automated payment reminders. Regular training courses for involved employees support the timely processing of payments. These actions aim to strengthen transparency in procurement, provide financial security for suppliers, and promote environmental and corporate social responsibility along the supply chain.

G1-3 – Prevention and detection of corruption and bribery

Design to prevent corruption and bribery, voestalpine's compliance management system is based on the following pillars:

- » **Risk analysis:** Identification of compliance risks within the Group through continuous analysis of potential compliance risk areas.
- » **Prevention:** For purposes of prevention, the Group undertakes activities to ensure ethics-based management and to raise awareness, which includes putting measures in place to monitor adherence to the Group's compliance rules. These include but are not limited to communications activities, training programs, and educational events as well as elements of the internal audit system.
- » **Detection:** In order to identify compliance violations, in addition to the various reporting channels the Group has instituted—in particular the whistleblower system—the Group also conducts investigations and audits, as circumstances warrant.
- » **Response:** Whenever it has identified compliance violations, the Group takes precautions to avert further compliance violations (e.g., by imposing additional oversight measures, educational events, and training programs).
- » **Sanction:** When compliance violations occur, the Group imposes appropriate sanctions. These include consequences under employment law, filing charges with the appropriate authorities, terminating contracts with third parties, etc.

The Compliance organization at voestalpine is responsible for investigating cases of suspected corruption (more information on the Compliance organization can be found in chapter G1-1 Corporate culture and business conduct policies under "Responsibility and Compliance Organization"). As the highest authority in the Compliance organization, the Group Compliance Officer reports directly to the Chairman of the Management Board. The Officer ensure reports are handled in an objective and timely manner. The members of the administrative, management, and supervisory bodies address the topic of corruption and bribery at meetings of the Management Board and Supervisory Board, as well as in committees of the Supervisory Board as circumstances require. Once per year, the Group Compliance Officer also prepares a summary report for voestalpine AG's Management Board. This report must contain at least the following points:

- » Type and extent of compliance incidences that have been the subject of reports and investigations;
- » Status of any pending administrative or judicial proceedings related to compliance incidents;
- » Educational events, training programs, and communications measures carried out;
- » Sanctions imposed.

The annual compliance report is also submitted to the Supervisory Board. In addition, reporting to the Management Board and Supervisory Board is carried out on an ad hoc basis.

PREVENTIVE ACTIVITIES

As part of its compliance management, voestalpine places particular importance on preventive activities. These include, in particular, training, management meetings, and ongoing information initiatives. Compliance is therefore a recurring theme, particularly at the major employee events at Group and divisional level, but also for top management. This focus on compliance ensures that the policies are accessible and that the impacts are understood by employees.

Employees learn how to deal with issues that include invitations, gifts, and potential conflicts of interest in periodic training courses, training sessions, and management meetings on the topic of business ethics (compliance training). Employees are also trained in dealing with business intermediaries.

The voestalpine Group has been offering e-learning courses on the topic of compliance since 2009. This e-learning curriculum is available in 15 languages and has been repeatedly revised and expanded over time. In addition to the learning units, the courses also present case studies and require a final test.

KEY E-LEARNING TOPIC: "COMPLIANCE BASICS"

Participants: all employees

What is Compliance?

Compliance at voestalpine incl. whistleblower system

Day-to-day compliance

Consequences of violations

Case studies and final test

KEY E-LEARNING TOPIC: "FAIR COMPETITION"

Participants: executives as well as employees in high-risk functions

Overview of antitrust law

Legal basics and consequences

Collusion between competitors

Collusion between suppliers and buyers

Case study: Sharing market information

Final test

KEY E-LEARNING TOPIC: "RECAP—FAIR COMPETITION"

Participants: executives as well as employees in high-risk functions

Collusion between competitors

Abuse of market position

Case study: Pricing policies

Case study: Sales prices

KEY E-LEARNING TOPIC: "PROTECTION AGAINST CORRUPTION"

Participants: all employees

Code of Conduct, contact persons, and whistleblowing

What is corruption?

Legal basics and consequences

Favors and payments

Final test

Certain groups, such as employees in procurement, sales, and senior executives, are at higher risk of corruption and bribery. In addition, voestalpine operates in countries where there is generally a higher risk of corruption. Alongside the e-learning courses, target group-oriented face-to-face and online training courses are therefore carried out throughout the Group, especially for employees in high-risk roles such as sales or procurement. This training is generally focused on adherence to the law and internal guidelines as well as on the topics of (anti)corruption and antitrust law as it applies to the participants' respective sphere of activity. Face-to-face training on issues of compliance with capital market regulations is also provided to employees of voestalpine AG.

Regardless of their function, all new employees of a Group company must complete the e-learning course "Compliance basics." Compliance training is also mandatory for young executives. Five face-to-face training courses were held in the 2024/25 business year as part of the value:program leadership development program, each of which was attended by up to 40 people.

The following tables provide an overview of the level of compliance training that was completed by employees, executives, and the managing directors of voestalpine in 2024/25.

NUMBER OF PARTICIPANTS E-LEARNING

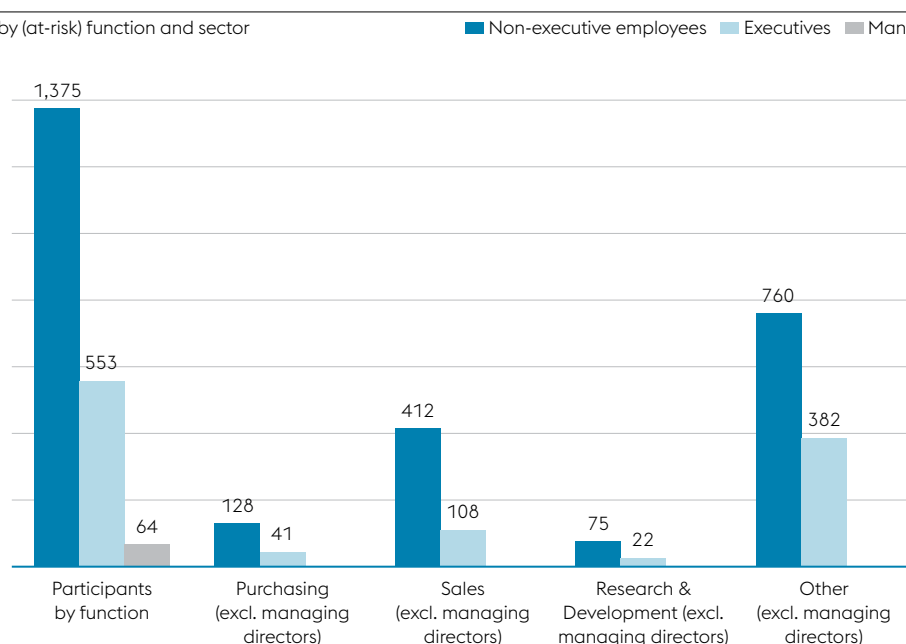
	Participants Total	Employees	Executives	Managing directors
Compliance basics	2,074	1,862	197	15
Antitrust law	695	575	100	20
Antitrust law refresher course	1,204	892	239	73
Protection against corruption	2,774	2,331	359	84

NUMBER OF PARTICIPANTS FACE-TO-FACE TRAINING

	Number of training sessions	Number of participants
value;program	5	170
Purchasing Power Academy	3	33
Compliance in general	64	1,789
Total	72	1,992

FACE-TO-FACE TRAINING: 1,992 PARTICIPANTS IN THE BUSINESS YEAR 2024/25

Participants by (at-risk) function and sector



The training program outlined here covers all functions across the Group that have been identified as at-risk in a risk analysis.

METRICS AND TARGETS

G1-4 – Confirmed incidents of corruption or bribery

There were no convictions or fines for violations of anti-corruption and anti-bribery laws during the reporting period. Therefore, no ad hoc action had to be taken to address such violations. For information on preventive measures, see chapter G1-3 Prevention and detection of corruption and bribery.

The following case has not led to any convictions or fines to date, but is cited here in view of the media attention in the 2024/25 business year: In early February 2024, deliberate accounting errors to improve results were identified at a German Group company in the Metal Forming Division. Further investigation revealed that the accounting errors dated back to the 2012/13 business year. Assets such as advance payments, receivables, and contract assets were overstated. Inventory accounts were increased due to accounting errors or necessary entries were omitted, such as write-offs of manufacturing costs in relation to tool settlements or advance payments. The accounting errors were corrected in full in the 2023/24 financial statements and ultimately led to revisions totaling EUR 100 million. There were no cash outflows as a result. Detailed reviews of similar Group companies have not revealed any accounting errors aimed at improving results.

In parallel to the accounting treatment of the incident in the 2023/24 financial statements, investigations were launched in February 2024 to identify the causes and responsibilities behind the incident, as well as the lessons that can be learned from them. This comprehensive investigation of the very complex situation was carried out by a specialist auditing firm and a German law firm. In the course of the investigation, interviews were conducted, documents and electronic correspondence were reviewed, and a large number of entries were analyzed. The investigation resulted in initial suspicion being placed on two former members of the management board of the German Group company in question regarding the instigation, involvement in, or toleration of accounting errors. As a result, voestalpine filed a criminal complaint against these two former members of executive management in September 2024. At the time the accounting errors were identified, the two members of executive management were no longer active in the voestalpine Group. The criminal complaint was not followed up due to the statute of limitations in Germany. In Austria, the Vienna Public Prosecutor's Office for Economic Affairs and Corruption has launched an investigation.

At present, the damage incurred by this case has been limited to consultancy fees and remains in the low single-digit million range. voestalpine assumes that the taxes overpaid due to the accounting errors can be virtually fully recovered. In the business year 2024/25, tax refund claims in the amount of EUR 19.2 million (excl. interest) have been recognized as income. Claims for compensation were asserted against two former members of the Management Board—out of court to date. Based on the findings from the investigation, improvement measures were defined in the internal control system both for the Group company and the affected business unit of the Metal Forming Division, and for the Group, the implementation of which has largely been completed.

OVERVIEW OF METRICS

ESRS disclosure requirement	Paragraph	Datapoint/metric	Basis for the creation and description of the parameters used, description of the assumptions and methodology
G1-3 Prevention and detection of corruption and bribery	21b	Percentage of functions-at-risk covered by training programs	At-risk functions: In particular employees in procurement or sales as well as managers
G1-4 Confirmed incidents of corruption and bribery	24a	The number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws	Documented based on reporting structure in the compliance organization

TAXES

As an international corporate group, it is essential for voestalpine to ensure consistent compliance with the tax legislation applicable in all countries in which it operates.

Detailed information on the identified tax-related impacts, risks, and opportunities (IROs) is presented in the following IRO table, which contains specific information on SBM-3.

Topic/sub-topic/ sub-sub-topic	Impact, risk, opportunity (IRO)	Description
Taxes	● Correct tax payments	voestalpine pays taxes in accordance with applicable national legislation

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

TAX-1 – Policies related to taxes

The Group Tax Strategy, which the Management Board of voestalpine adopted as part of the Group Tax Guideline, represents the voestalpine Group's commitment to comply with the tax rules and regulations applicable in a given country in connection with all of its business activities and decisions. The key principles governing the Group's tax strategy are as follows:

» Tax policy:

As part of its global strategy, the voestalpine Group pursues the goal of minimizing its total costs. This is why tax election options are utilized to the extent allowed by law in order to lower the Group's tax liabilities unless doing so adversely affects the Group's business. In any case, the Group's tax policies are designed to comply with tax law.

Where applicable: description of the sources of measurement uncertainty	Resulting level of accuracy	External validation	Where applicable: planned actions to improve accuracy
Recording primary data	High	None	–
Recording primary data	High	None	–

Impacts on strategy and business model	Value chain	Time horizon	Affected stakeholders
Promotes the economic stability of the company	>>> Group-wide	●●●●	» Legislators
Avoids legal risks			» Society

Key

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

» Corporate responsibility:

The voestalpine Group pays taxes wherever it generates value added. Transfer pricing within the Group is based on the OECD Transfer Pricing Guidelines. Transfer prices are not used to design tax policy.

» Relationships with government agencies:

The voestalpine Group fulfills all cooperation duties under tax law. In particular, it complies with all tax-related retention and recording requirements, whether temporal or geographical. The voestalpine Group collaborates proactively in the processes associated with assessments of new laws within the institutions established for that purpose.

Each Group company's executive management is responsible for implementing and complying with tax rules and regulations as well as the Group Tax Guideline. voestalpine AG and its divisions' lead companies regularly review and update the Group Tax Guideline and monitor implementation thereof and compliance therewith in the Group companies. The functional responsibility for these activities at the Management Board level rests with the CFO of voestalpine AG. To ensure compliance with the Group Tax Strategy, steering processes and monitoring measures were developed for voestalpine AG and the divisions' lead companies regarding the key tax processes in the Group companies that are integral to the Group Tax Guideline.

Furthermore, appropriate activities were undertaken to ensure compliance with the Group Tax Guideline in the long term. Among other things, this includes reviews of employees' qualifications, clear job descriptions, regular sharing of information related to task-specific matters, and employee training.

The Group companies, the divisions' lead companies, and voestalpine AG regularly exchange information in order to identify tax risks early on. Discussions within Controlling are carried out to this end on a regular basis, with the aim of monitoring the implementation of activities related to material tax issues. Changes in tax legislation or modifications of business models are coordinated with the divisions' lead companies. The given Group company analyzes the effects thereof and develops suitable activities based thereon, as necessary in collaboration with the division's lead company or voestalpine AG.

If a Group company realizes that a tax return or tax declaration previously filed with the tax authorities is incorrect or incomplete, this Group company must immediately notify the relevant tax authority of this in accordance with national statutory requirements and must make the necessary adjustments. The respective division's lead company or the Group tax department are notified if such tax offenses are discovered, and activities are defined to fix and/or eliminate problems of this nature. Group companies are required to engage an external tax consultant in order to obtain their assessment of material facts and thus to mitigate any tax risks. The annual tax returns are submitted to a critical audit by an external tax consultant at the least before being submitted to the tax authorities. In general, each Group company meets with an external tax consultant at least once a year to cover important issues. Since October 1, 2017, KPMG has been acting as a global tax partner in the role of external tax consultant.

Any concerns regarding unethical or unlawful conduct may be reported using the Web-based whistleblower system. This system is also available for stakeholders to voice their concerns.

POLICY OVERVIEW

IROs addressed	Policy	Core content	Scope of the policy	Responsibility and monitoring	Other comments
Correct tax payments	Group tax guideline, incl. group tax strategy	<p>voestalpine's commitment to comply with the tax rules and regulations applicable in the given country in connection with all business activities and decisions within the Group with the observation of three principles</p> <p>Tax policy: minimize overall costs by utilizing tax election rights while ensuring full compliance with tax legislation</p> <p>Corporate responsibility: tax is paid at the location of value creation</p> <p>Relations with authorities: fulfillment of all cooperation duties under tax law and active participation in the assessment of new legislation</p>	Own operations	CFO of voestalpine AG	–

Beyond the Group-wide strategic objectives, there are currently no separate, time-limited, and outcome-oriented targets and measures in relation to taxes in accordance with ESRS 2 para. 62 and in accordance with ESRS 2 MDR-T para. 81bi-ii. The central premises are the promotion of the economic stability of the company, the avoidance of legal risks, and the correctness of tax payments in accordance with applicable national laws.

METRICS AND TARGETS

TAX-2 – Metrics related to taxes

Country-by-country report:

As a multinational Group with consolidated revenue in excess of EUR 750 million, voestalpine AG as the Group's parent annually submits a Country-by-Country Report to the appropriate Austrian tax authority.

See the chapter Investments in the voestalpine Annual Report 2024/25 for Group companies' names and domiciles. The country-specific disclosures in the country-by-country report (see following table) concern entities that are included in the Consolidated Financial Statements by virtue of being fully consolidated (see the chapter Investments of the Annual Report 2024/25). Hence information on entities measured at equity (classified as "KEA" or "KEG" in the aforementioned chapter) as well as on unconsolidated entities (K0) is not included in this report. The data concerns the period from April 1, 2024, through March 31, 2025.

COUNTRY-BY-COUNTRY REPORTING

Tax jurisdiction	Main activity	Number of employees ¹	Revenue from third-party transactions ²	Revenue from intra-Group transactions with other tax jurisdictions ³	Profit before tax ^{4,9}
ARE	Sales	23	53,827	3	1,682
ARG	Sales	68	20,889	0	1,281
AUS	Production, sales	318	135,324	65	8,999
AUT	Production, sales, services	23,280	8,272,485	1,638,299	1,162,772
BEL	Production	639	236,159	40,973	22,378
BGR	Production	110	11,139	3,996	1,442
BRA	Production	2,535	451,483	59,302	9,892
CAN	Production, sales	246	98,069	3,926	-8,914
CHE	Sales	122	79,909	2,280	-2,425
CHN	Production, sales	2,229	640,541	10,972	63,635
COL	Sales	69	6,872	52	-369
CZE	Production, sales	371	58,760	56,734	6,280
DEU	Production, sales	6,237	1,698,330	439,715	-478,776
DNK	Sales	12	8,281	191	718
ECU	Sales	35	3,460	0	62
EGY	Production	53	9,950	0	867
ESP	Production, sales	295	108,399	16,502	4,976
FIN	Sales	8	8,488	5	283
FRA	Production, sales	857	254,379	19,760	6,158
GBR	Production, sales	699	289,307	4,368	50,714
GRC	Sales	6	3,981	0	-54
HKG	Sales	4	1,323	31	-727
HUN	Production, sales	281	49,378	5,813	3,730
IDN	Production, sales	177	9,509	14,283	245
IND	Production, sales	923	117,625	7,382	6,700
ITA	Production, sales	699	256,028	44,939	8,812
JPN	Sales	84	26,427	148	211
KOR	Sales	49	10,243	199	45
LTU	Production	79	10,498	8,782	1,518
LVA	Production	6	7,794	60	132
MEX	Production	633	72,640	15,661	3,094
MYS	Sales	61	5,233	25	-508
NLD	Production, sales	1,181	532,649	14,529	57,796
NOR	Sales	2	2,281	3	268
PER	Sales	88	10,246	0	949
POL	Production, sales	914	306,389	6,143	8,018
PRT	Production	40	1,546	318	-302
ROU	Production, sales	903	225,389	19,156	29,015
RUS	Sales	3	40	0	-616
SAU	Production	64	9,920	0	1,788
SGP	Sales	148	73,898	188,756	-1,793
SVK	Sales	25	5,954	1	829
SWE	Production, sales	1,167	82,079	279,138	20,083
THA	Production, sales	123	21,758	56	71
TUR	Production, sales	283	39,142	8,258	-4,755
TWN	Sales	106	8,999	797	1,063
USA	Production, sales	2,864	1,291,495	32,102	43,754
VNM	Sales	66	3,678	0	-110
ZAF	Production	474	111,495	0	11,579

Property, plant, and equipment ⁵	Income tax paid ⁶	Tax expense incurred ⁷	Reasons for the difference between the tax incurred and the tax expense determined by application of the standard tax rate on the profit before tax ⁸
279	1	146	
841	1,935	0	f)
17,204	2,451	2,469	
4,463,441	139,956	-8,652	a), b), f)
63,188	4,891	5,115	
3,866	172	172	
113,181	5,923	4,904	a), c), f)
20,529	70	82	
16,499	262	-46	
161,827	13,896	13,942	a), b), d)
1,945	177	0	
33,766	825	1,251	
468,779	12,200	1,045	c), f)
554	119	152	
713	57	43	
2,391	14	379	
19,035	676	622	
1,174	1	30	
68,169	-227	1,291	
42,035	6,304	4,071	a), c), f)
105	0	0	
46	0	0	
11,403	1,352	863	
3,224	430	274	
28,965	1,962	1,928	
99,395	1,519	1,699	
5,975	402	33	
3,740	14	14	
3,543	257	220	
186	0	0	
25,079	2,304	2,585	a), b), c), f)
4,307	-7	0	
123,688	6,568	6,679	a)
19	151	52	
1,826	230	288	
54,963	1,647	1,663	
1,321	10	10	
43,387	5,110	3,799	a), b)
349	-222	-106	
2,916	80	257	
9,519	1,082	869	a), b), e)
878	270	172	
145,102	4,348	3,860	
4,072	-1	0	
4,776	341	420	
3,390	188	149	
262,172	-399	1,627	a), b), e), f)
1,615	0	0	
20,900	1,322	1,515	a), e)

¹ The "Number of employees" metric refers to the total number of employees in all business units within a tax jurisdiction. The number of employees is based on full-time equivalents (FTE). The number of employees refers to the status as of the end of the respective business year.

² The "Revenue" metric concerns the total revenue generated by all business units within a tax jurisdiction. There are no deviations from the revenue shown in the Consolidated Financial Statements.

³ This metric includes revenue from intra-Group transactions of all business units within a tax jurisdiction with those in other tax jurisdictions.

⁴ The "Profit before tax" metric concerns the total profit before tax of all business units within a tax jurisdiction. Deviations from the Consolidated Financial Statements arise, in particular, from the fact that the metric contains figures added country by country, whereas the Consolidated Financial Statements contain consolidated figures.

⁵ The "Property, plant, and equipment" metric equates to the net carrying amount of all property, plant, and equipment belonging to the business units within a tax jurisdiction as of the end of the respective business year. There are no deviations from the property, plant, and equipment shown in the Consolidated Financial Statements.

⁶ The metric referring to the income tax paid concerns the total income tax paid by all business units within a tax jurisdiction.

⁷ The metric referring to the income tax incurred concerns the total of all income taxes of all business units within a tax jurisdiction, excluding deferred taxes and provisions for uncertain tax items.

⁸ An expected tax expense may be determined based on the regular tax rate applicable to the "Profit before tax" metric. Temporary differences and effects from prior periods may result in differences between the actual tax expense and the expected tax expense. Key differences between the actual tax expense and the expected tax expense in individual countries arise from:

- a) Non-taxable income (e.g., income from shares)
- b) Non-deductible expenses
- c) Profit before tax includes the total of all earnings of all business units; but the tax assessment is carried out by business unit (without offsetting the gains and losses of all the subsidiaries, excluding Austria and the US).
- d) Special tax assessment regime/tax incentives
- e) Use of tax loss carryforwards and/or carrybacks
- f) Temporary differences and effects from prior periods

⁹ This metric contains a large percentage of tax-exempt income from shares, some of which is multi-tiered, especially in Austria.

OVERVIEW OF METRICS

ESRS disclosure requirement	Para-graph	Datapoint/metric	Basis for the preparation and description of the metrics used; description of the assumptions and methodology
TAX (entity-specific topic)	–	Country-by-country report (CbCR)	The country-specific disclosures in the country-by-country report concern entities that are included in the Consolidated Financial Statements by virtue of being fully consolidated. Hence information on entities measured at equity (classified as “KEA” or “KEG” in the aforementioned chapter) as well as on unconsolidated entities (K0) is not included in this report. The data concerns the period from April 1, 2024, through March 31, 2025.

Where applicable: description of the sources of measurement uncertainty	Resulting level of accuracy	External validation	Where applicable: measures planned to improve accuracy
-	High	None	-

Linz, May 26, 2025

The Management Board

Herbert Eibensteiner

Franz Kainersdorfer

Gerald Mayer

Reinhard Nöbauer

Carola Richter

Hubert Zajicek