

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
	Ensures ethical standards Strengthens the employer brand Improves employee retention	>>> Group-wide	●●●●	Employees and non-employees NGOs and NPOs
	Strategic retraining of employees Minimizes disruptions to operations Counteracting reputational damage	>>> Group-wide	●●●●	Employees Special interest and advocacy groups

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.

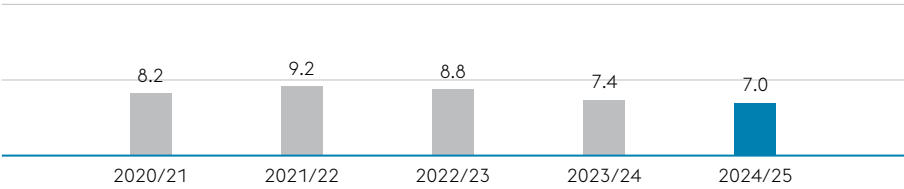
Near misses are also systematically recorded as part of a Group-wide health & safety web tool. Actions to improve the situation are defined on the basis of the review of incident reports and documented if necessary.

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)	» 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	» 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	» 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.

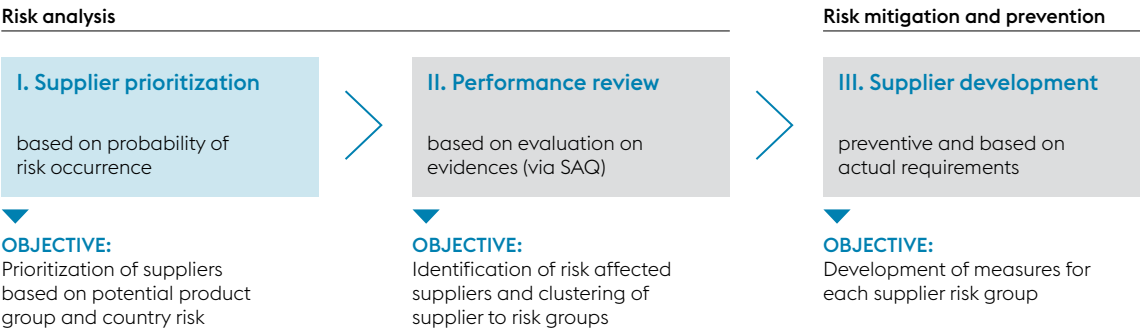
The current version of the CoC-BP was adopted by the Management Board of voestalpine at the end of the business year 2022/23. This Code defines voestalpine's principles and requirements, and is designed to ensure that the practices of business partners conform to both voestalpine's values as well as 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

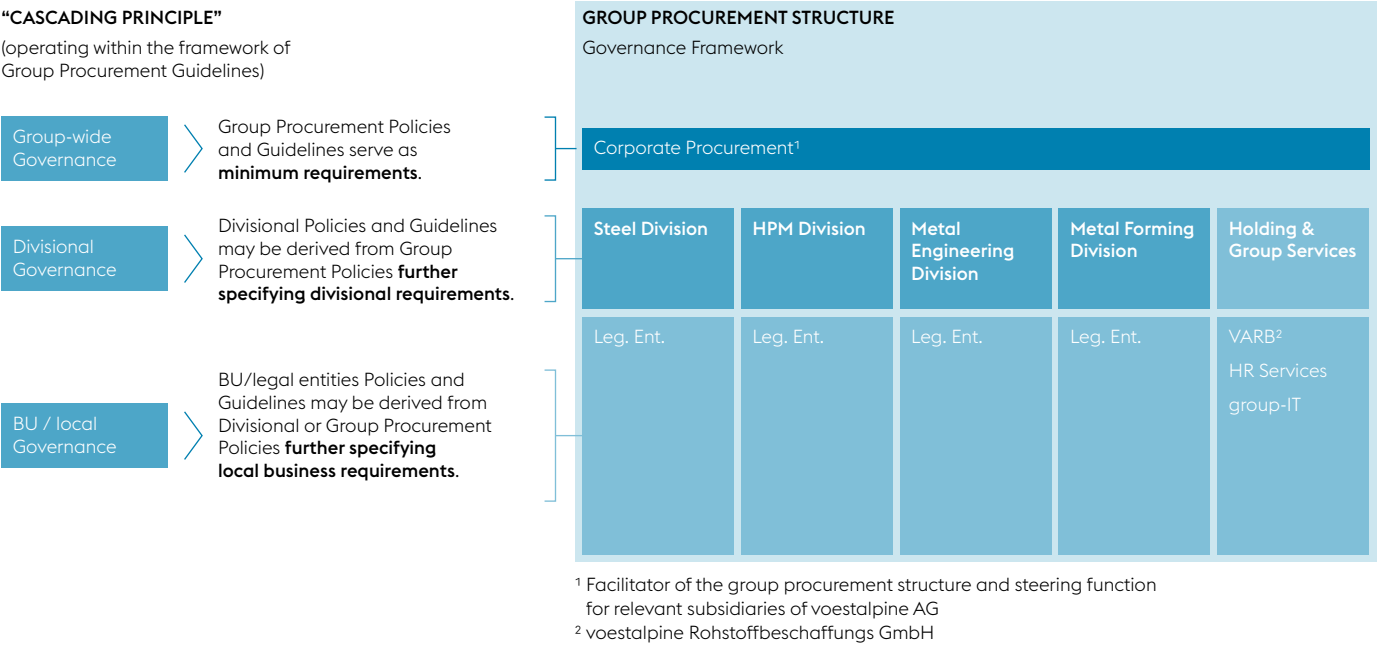
New suppliers are added to the database on the basis of risk and on a gradual basis. Supplier development is evaluated using a conventional supplier assessment. All relevant suppliers are classified as A, B, C, or D suppliers once a year. Depending on the product group, different criteria are included 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



Procurement governance follows a cascade principle: The Group defines binding minimum standards and specifications at the overarching level. Subordinate organizational units must operate within this framework and comply with the requirements of the respective superordinate level.

The executive management of the respective Group company is responsible for implementing Group-wide and divisional procurement 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)

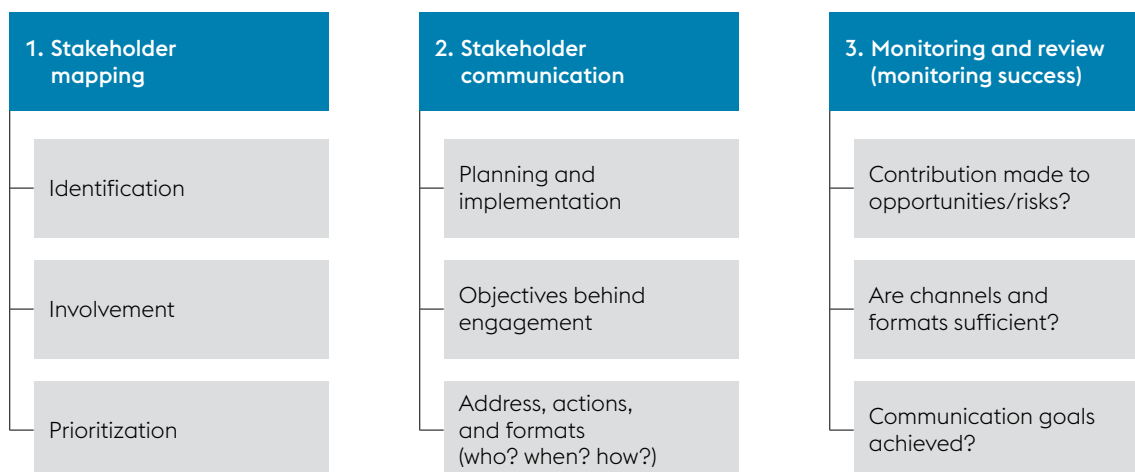
This code sets out clear and transparent rules for the voestalpine's lobbying activities. voestalpine's Lobbying Code of Conduct governs dealings with stakeholders in Austria as well as in Europe and on a global scale in accordance with the Austrian Lobbying and Advocacy Transparency Act.

» 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