



# SUSTAINABILITY— REPORT — 2024



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# INTRODUCTION



# ABOUT THE REPORT

Welcome to our latest Sustainability Report, which outlines our activities in 2024. True to our commitment, we have begun preparing this publication annually to reflect on our business strategies and efforts toward more sustainable practices in our industry. We have also dedicated efforts to creating a science-based, comprehensive, and feasible plan to address the greatest challenge of our time: climate change.

This report has been developed in reference to the European Sustainability Reporting Standards (ESRS). Although CRONIMET is not yet bound by this legislation for the year 2024, adopting this approach is the best way to shape our processes and anticipate potential gaps. We have updated our previous double materiality assessment to evaluate the impacts, risks, and opportunities across our value chain. This assessment, along with our policies, actions, targets, and metrics, varies for each material topic and can be found in the “Sustainability Statement,” starting on [page 19](#). Additionally, an ESRS Index on [page 58](#) will assist you in navigating the different disclosures.

We have also included a summary at the beginning of this publication to provide an overview of our business and highlight our achievements in 2024. The “2024 In Brief” section, which features key information and performance indicators, can be found on [pages 6 to 18](#).

For more information about this report, our sustainability approach, and related data, please contact the Sustainability Management Team at [sustainabilitymanagement@cronimet.de](mailto:sustainabilitymanagement@cronimet.de)

— WE ARE DEVELOPING  
JOINT SOLUTIONS THROUGH  
CONSTRUCTIVE DIALOGUE  
WITH OUR CUSTOMERS AND  
SUPPLIERS. —





# MESSAGE FROM THE CEO

Dear friends,

The year 2024 was a period of contrasts. Despite registering favorable sales during the first half, we experienced a downturn during the year's second semester. Industrial and consumer activity stalled in Europe, where CRONIMET concentrates around two-thirds of the operational footprint. Hence, we registered a decline in our profitability. However, considering the circumstances, we still regard it as a satisfactory outcome. Moreover, we started the process of further evolving our strategy, improving our efficiency, and focusing on optimal sales-oriented inventories.

Our focus is on maintaining strong and stable financial results in a dynamic global macroeconomic and geopolitical scenario. Even in difficult external circumstances, we won't lose our path. We are investing in the future if we are investing in sustainability. This decision means we are keeping pace in delivering our goals, particularly our climate strategy, where we set clear science-based targets to be achieved by 2034 and 2050. It's our collective goal at CRONIMET, and it needs to be nurtured each day despite the economic downturn. We have also progressed in compliance and supply chain due diligence while reinforcing risk management to build further resilience.

We are prepared to confront the challenges ahead and realize the opportunities that will present themselves on this journey. We have significantly strengthened the Holding Management Board with the two heads of our corporate divisions. They have already helped CRONIMET drive complex and innovative projects at high speed and quality, such as the start of production of additional ferroalloys in Brazil. We also continued developing our "oneCRONIMET" principle, bringing our employees and subsidiaries closer to each other as well as to our values. Our culture of collaboration and communication is one of our greatest strengths.

Looking ahead, the green transition of the economy is among the key drivers behind infrastructure investments in many parts of the world, and stainless steel is expected to be in high demand to support those efforts. Therefore, we are committed to seizing this opportunity and achieving long-term success as a leader and forward-thinker in the circular economy. We will work diligently to maintain a balanced approach that supports robust financial performance and stability while advancing our commitment to sustainability.

Sincerely,

**Jürgen Pilarsky**

CEO CRONIMET Holding GmbH





# 2024 IN BRIEF



# ABOUT US

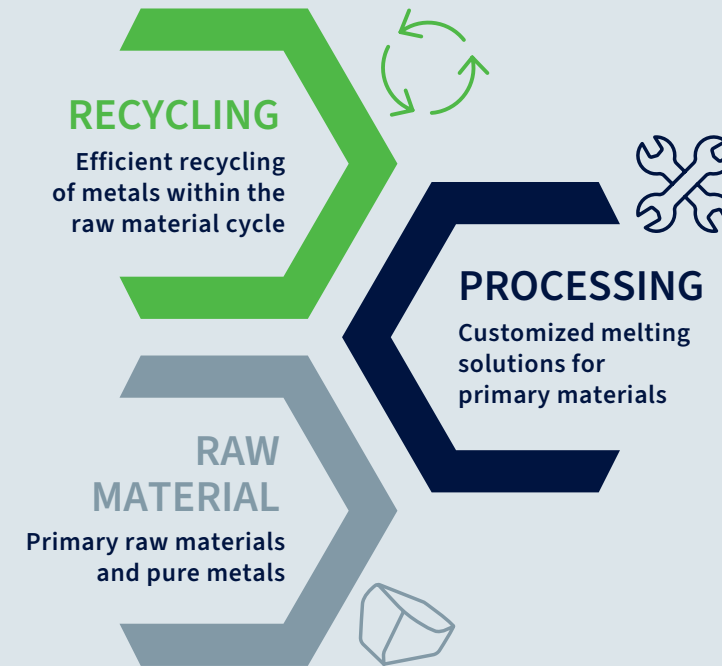
CRONIMET is a global specialist in stainless steel scrap and ferroalloys headquartered in Karlsruhe, Germany. Since 1980, we have been creating and expanding the possibilities of returning metals to the materials cycle through recycling and processing. By enabling recycling, we make everything made of metals more sustainable, benefiting our industry, consumers, and the environment.

We take great pride in this contribution. However, our understanding of sustainability goes beyond. We also care about how we do business and how it impacts people, our partners, and the planet. A responsible and ethical conduct makes us the partner of choice for our customers, and this behavior will continue to drive our long-term success.

— "WITH CRONIMET, I WANT TO CREATE A PLACE WHERE TOGETHER WE CAN JOYFULLY MAKE A FAIRER AND MORE SUSTAINABLE LIFE POSSIBLE FOR ALL!" —

Jürgen Pilarsky, CEO and majority shareholder, CRONIMET Holding GmbH

## CRONIMET'S BUSINESSES ARE BASED ON THREE AREAS:



# #1

IN THE WORLD FOR  
STAINLESS STEEL  
RECYCLING



# 100%

FAMILY-OWNED COMPANY



# 75

LOCATIONS  
WORLDWIDE

# 62

YARDS THAT  
HANDLE MATERIAL



# 2.6 B €

REVENUES



# 68 M €

IN OPERATING RESULTS



# 1,823

EMPLOYEES

## 2024 BUSINESS HIGHLIGHTS

An essential part of our strategy is achieving robust financial results in a dynamic global macroeconomic and geopolitical scenario characterized by uncertainties. Therefore, we have initiated and continued various strategic measures in 2024 to secure future success.

### WE COMPLETED THE DEAL WITH OUR CUSTOMER OUTOKUMPU

to accelerate the circular economy and optimize the regional secondary raw material cycle, thus enabling closer collaboration. Outokumpu's acquisition of a 10% minority interest in CRONIMET North-East GmbH allows increased collaboration efforts, with workshops and exchanges between operational teams and C-level representatives to accelerate the partnership's potential.



*Ferrotitanium production*



*Secondary materials (scrap)*

### WE STARTED THE FIRST SCRAP-BASED PRODUCTION OF FERROTITANIUM

in South America. We are leveraging our internal competencies in recycling and processing to source titanium scrap and turnings, and crushing and briquetting them to feed our ferrotitanium (FeTi) production at CRONIMET Brasil. The scrap is melted in induction furnaces, which use electromagnetic fields to heat the scrap and thus do not cause CO<sub>2</sub> emissions. We also began manufacturing cored wires filled with different metals, reaching 100% yield and supporting the fine-tuning of the steel composition. Both lines are poised to increase our company's strategic role as a critical supplier in this segment.

*Metallplast Recycling team*



### THE ACQUISITION OF METALLPLAST RECYCLING IN THE CZECH REPUBLIC

allowed us to fill a gap in our Central European supplier network and enhance our market position in the region.

### CRONIMET IS NOW THE LARGEST TUNGSTEN CONCENTRATE SUPPLIER IN THE WESTERN WORLD

by securing offtake and marketing rights for tungsten concentrate from two mines in Australia and Spain.



*Tungsten concentrate*



## OUR MATERIAL TOPICS

Based on the review of our materiality analysis in preparation for the fully compliant CSRD reporting requirements, we are in the process of defining goals for all relevant topics.  
See more on page 28.

### ENVIRONMENT



**CLIMATE CHANGE**  
mitigation &  
adaptation,  
and energy



**CIRCULAR ECONOMY**



### SOCIAL



**OWN WORKFORCE**  
Working conditions:  
secure employment  
and health & safety



### GOVERNANCE



**BUSINESS CONDUCT**  
Management of  
relationship with  
the suppliers



## SECURING OUR CERTIFICATIONS

Despite stricter criteria, we confirmed in 2024 our silver medals from EcoVadis for CRONIMET Brasil and CRONIMET Ferroleg. The achievement positioned us among our industry's top 15% of companies. Many subsidiaries also attained recertifications for their management systems or obtained additional ones, demonstrating our continuous effort to operate with excellence and high-quality standards.

Furthermore, our activities in Brazil were recertified by the Responsible Minerals Initiative (RMI), ensuring our commitment to purchasing non-conflict materials.





## — ENVIRONMENT

# DRIVING CIRCULARITY IN THE METAL INDUSTRY

**A circular economy is a system where materials never become waste and are recycled at the end of their lifetime. It tackles global challenges like climate change, biodiversity loss and pollution as well as supply chain risks and material scarcity by decoupling economic activities from the consumption of finite resources.**

— Metals can be recycled infinitely without loss of quality. Therefore, the level of circularity achieved in the steel and metal sector is unprecedented. However, it is still necessary to add small amounts of primary materials to achieve the quality requirements. CRONIMET has been using its core competencies of turning scrap into high-quality products to reduce the environmental impact in this field. We have developed ways to integrate primary materials deviating from the norm specifications, which other companies cannot work with and that would otherwise go unused.

Recycling metals reduces possible environmental and social damage from mining and offers a solution for the stability of the supply around the globe. It is also an important factor in limiting global warming. According to a study\* by the Fraunhofer Institute for Microstructure of Materials and Systems from 2020, using scrap instead of primary metals comes with savings ranging between 3.7 and 4.7 tons of carbon emissions per ton of stainless steel, depending on the alloying elements included.

With our dedication and expertise, we are constantly working on innovations to increase the recycling rate and decrease the need for primary metals. We cooperate with our partners along the value chain to improve, expand, and establish circularity in other markets and business fields.

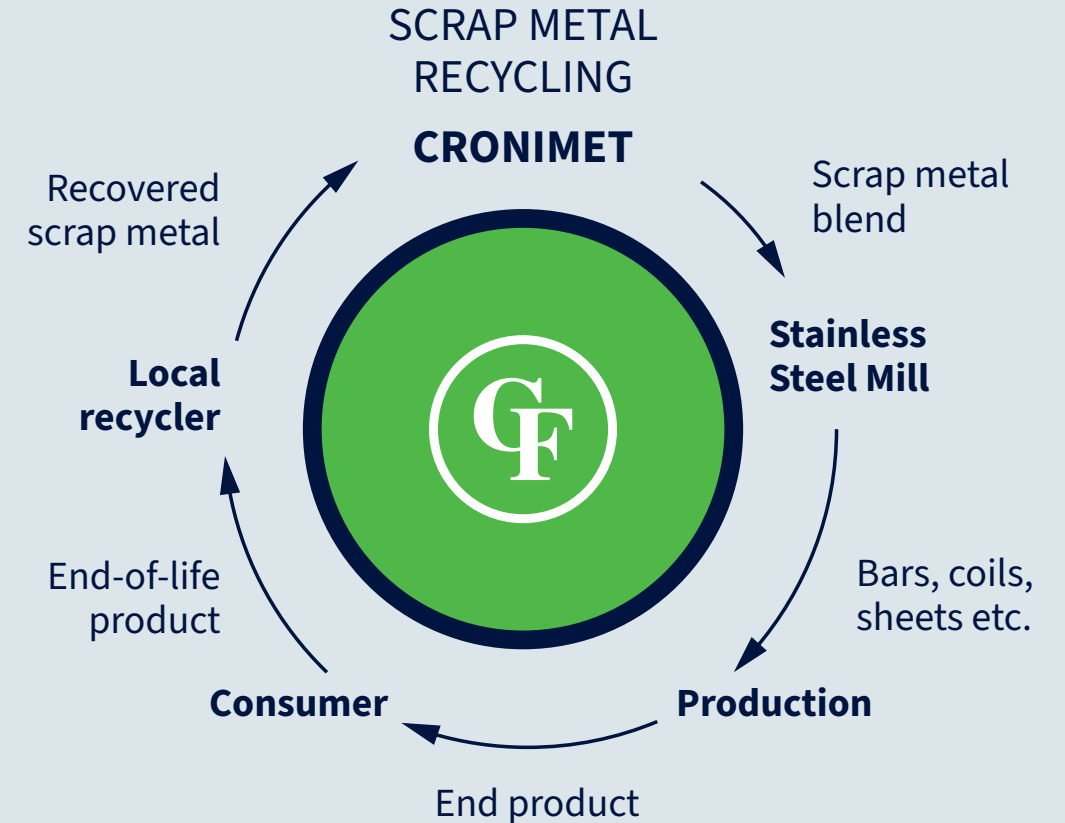
\*Fraunhofer Institute For Microstructure Of Materials And Systems:  
[Pothen, et. al. \(2020\): Scrap Bonus – External costs and fair competition in the global value chains of steelmaking. Halle \(Saale\).](#)



**1.8**  
MILLION TONS OF  
MATERIAL SOLD



**97.3%**  
RECYCLING RATE



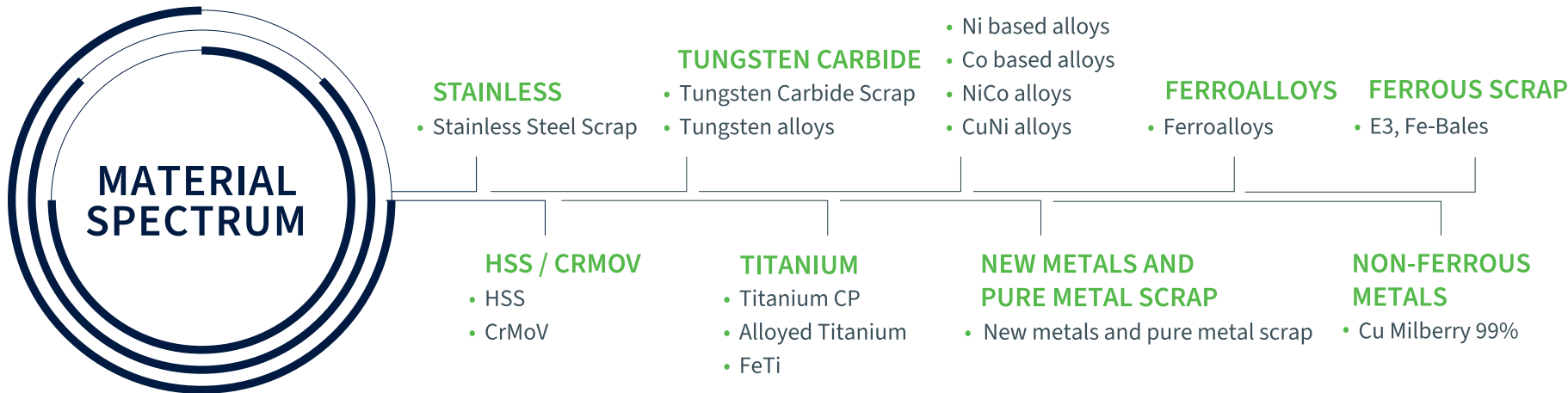




## OUR PORTFOLIO

Our portfolio covers a diverse material spectrum, including stainless steel, HSS/CrMoV, tungsten carbide, titanium, super and special alloys, ferroalloys, and pure metal. In 2024, we expanded it with in-house value creation by producing ferrotitanium and cored wire in Brazil. We are also continuously looking for opportunities within our established materials and markets.

We found, for example, a solution to meet our customer's demands for various chrome steel specifications. Materials previously sold in mixed fractions can now be sorted and sold separately, thus retaining higher quality. We did this by using our well-established sorting processes within the stainless steel operations.



## BATTERY RECYCLING

Our new subsidiary, Revomet, is poised to support the circularity demands of the electromobility revolution. The modern plant in Bitterfeld-Wolfen (Germany) will be the central hub for processing battery materials with a planned capacity of 28,000 tons annually. Revomet has designed processes to treat end-of-life batteries as valuable input material for new batteries. The first step of discharging batteries is already in operation, with the electricity fully reutilized in our systems. This crucial initial process enables the next step of recycling the batteries, a phase under development.

Furthermore, we have initiated important strategic partnerships with key players in the battery recycling industry to advance our ambitions, like CNGR, the leading manufacturer of cathode active materials.



## — ENVIRONMENT

# TAKING CLIMATE ACTION

We do not settle on knowing that our business model is sustainable per se. Conserving precious resources is part of our identity, extending from material to environmental considerations. By phasing out fossil fuels, we limit global warming while investing in our long-term success. The fight against climate change requires rapid, extensive action. Our emission reduction targets align with the Paris Agreement pathway for limiting global warming to 1.5 °C above preindustrial levels. They have been externally approved by the Science Based Targets Initiative (SBTi).

## OUR TARGETS

IN THE **NEAR-TERM**, CRONIMET GROUP COMMITS TO:

SCOPE 1 AND 2

**-60%**

— reduce absolute scope 1 and 2 GHG emissions 60% by 2034 from a 2021 base year.\*

SCOPE 3

**-35%**

— reduce absolute scope 3 GHG emissions 35% by 2034 from a 2023 base year.

TOWARD **NET ZERO**, CRONIMET GROUP COMMITS TO:

SCOPE 1 AND 2

**-90%**

— reduce absolute scope 1 and 2 GHG emissions 90% by 2050 from a 2021 base year.\*

SCOPE 3

**-90%**

— reduce absolute scope 3 GHG emissions 90% by 2050 from a 2023 base year.\*

LEVERS OF OUR **CLIMATE ACTION** PLAN:



Strategic prioritization



Electrification



Switch to non-fossil electricity



Energy efficiency



Preference of low-emission alternatives in purchasing decisions



Decarbonization along the value chain

*\*The target boundary includes land-related emissions and removals from bioenergy feedstocks.*



## OUR CLIMATE JOURNEY

THESE ARE THE REDUCTIONS WE COULD  
ALREADY ACHIEVE:

### SCOPE 1 AND 2

**-28.9%<sup>1</sup> SINCE OUR BASE  
YEAR 2021**

<sup>1</sup>A large share of the reductions results from the restructuring of our subsidiary in Armenia, and are not permanent. Excluding these temporary effects, our overall reductions amount to approximately 11.2%.

### SCOPE 3

**-11.4%<sup>2</sup> SINCE OUR BASE  
YEAR 2023**

<sup>2</sup>The majority of Scope 3 emissions stems from the processing of our material by customers. The reductions reported here are primarily due to lower tonnages.

THESE ARE SOME OF THE MEASURES WE  
TOOK TO ACHIEVE THEM:



#### — Strategic prioritization

- We established a Sustainability Management department with expertise in climate-related matters. It has extended our possibilities of monitoring emissions, creating transparency on progress and enabling quick reactions to deviations from our plan.
- The responsibility for decarbonizing both our Recycling Division and our processing facilities has been assigned at C-level within our Management Board.
- Our Management Board is committed to dedicating financial resources to decarbonizing CRONIMET's operations.



#### — Electrification

- Our central expert group called “Team Technics” helped develop “Big Pictures” for the electrification of all European yards, increasing the readiness of our infrastructure for the electrification of yard machinery.
- Several yards have already started to exchange fossil-fueled machines with electric alternatives to work toward emission-free operations. We continue collaborating with machinery producers to ensure the newly developed electric alternatives meet our needs.

#### Share of electric machinery:



**33%**  
forklifts



**5%**  
excavators



**25%**  
shunters



**3%**  
loaders

- We continued to electrify our fleet of company cars and set up more on-site car charging stations to support the transition to e-mobility.



**24%**  
electrification of cars  
(hybrids count as 50%)



#### — Switch to non-fossil electricity

- More subsidiaries switched their electricity contracts to non-fossil sources:



**21**  
out of 62 yards & plants have  
switched to purchasing non-  
fossil electricity (+3 in 2024)



**>43%**  
of our overall electricity  
consumption is now fossil-free.

- Continuous investments in photovoltaics since 2020:



**17**  
solar plants are in operation at  
CRONIMET locations (+ 4 in 2024)

Four of them were added in the reporting year. Particularly important is the one in South Africa, where there is no possibility to purchase non-fossil electricity from the grid.



**1.4 GWH**  
is the amount of self-produced  
power we consumed (increased  
by 90% in 2024).



## SOCIAL

# PROMOTING A CULTURE OF OPENNESS AND COLLABORATION

Our success is a direct result of the dedication of a highly experienced management team and exceptionally skilled employees. Our values and leadership principles have enabled us to continue to build an environment that provides supportive leadership, engaging and meaningful work, positive team spirit, and well-being in the whole group.

In February 2024, we launched the oneCRONIMET Intranet and Employee App, marking a milestone in our journey toward enhanced digital integration and global connectivity. Moreover, it aims to bring people closer, bridge geographical distances, and embrace different cultures. It has proven to be a key tool for building a culture of openness and collaboration.



**1,823**  
EMPLOYEES



**19%**  
OF WOMEN IN MANAGEMENT



**20%**  
PROPORTION OF FEMALE WORKERS OVERALL



## WOMEN IN LEADERSHIP

We are particularly proud of our efforts to ensure female representation in leadership positions, which reached 19% in 2024. Besides our internal initiatives to support the development and representation of women within CRONIMET, we are actively supporting external ones.

In 2024, we became an official member of the Women4Metals (W4M) initiative in Germany, while the financial director of our subsidiary in Great Britain became a Board Member of the local Women in Recycling organization. Both initiatives improve the visibility and opportunities of women in the metal and recycling industry, creating a work environment that attracts, empowers, and inspires female employees.

Thanks to our membership in Women4Metals, we can now benefit from support programs for women, such as the Cross Mentoring Program. The aim is to provide mentees with new perspectives, knowledge, and skills through exchanges with experienced managers or experts from different companies in the industry.



## SOCIAL

# SUPPORTING HEALTH AND SAFETY

Workplace safety is the priority in our business and a core value we uphold. Hence, we have established processes to track group-wide accident KPIs. Our professional occupational health and safety system is manifested in our DIN EN ISO 45001 certifications, which are in place at many of our operational sites.

As we continuously improve, we launched a new workplace safety campaign at our Karlsruhe site, which will be shared with all CRONIMET operational units, and we redesigned our work clothing to guarantee better visibility. Committed to supporting the whole industry, our experts contributed to producing a film about work safety at the scrapyard, sponsored by the German Social Accident Insurance Institution for Trade and Distribution (BGHW).



On top of the regular sports programs and incentives to support the physical health of our employees, we also acknowledge the importance of mental health. In 2024, 21 employees participated in Mental Health First Aid training to support colleagues in urgent and critical situations. Furthermore, managers in our major site in Karlsruhe were trained on how to recognize and support team members with mental concerns.

OUR POLICIES AND ENGAGEMENT STRATEGIES ENSURE THAT HUMAN RIGHTS, DIVERSITY, INCLUSION, AND WORKPLACE SAFETY REMAIN INTEGRAL TO OUR CORPORATE CULTURE.





## — SOCIAL

# MAKING A DIFFERENCE BEYOND BUSINESS

Our social action efforts include volunteering our time and expertise, partnering with other organizations, providing aid in natural and humanitarian disasters, and supporting stand-alone campaigns that can make a difference in other people's lives. In 2024, the CRONIMET Group contributed more than €130,000 to local, national, and international organizations and projects such as:



### — **Support to TU Dortmund University:**

From 2024 to 2026, we will donate financial resources to assist the development of 40 children with rare genetic syndromes through music therapy. In addition to improving motor skills and speech, music therapy reduces the risks of self-injurious behavior.

### — **World Cleanup Day:**

Our employees joined millions of volunteers in this civic worldwide movement. In Karlsruhe, they gathered to collect waste around CRONIMET's facilities and near a river. Our teams in Poland also cleaned around their locations, with some employees having the support of their children, making it a family endeavor.

### — **Flea Market:**

For the fifth year in a row, the employees in the Czech Republic organized a charity flea market to support the Ondrasek Mobile Hospice, which provides palliative care for people facing serious illnesses. The funds raised were matched by CRONIMET Ostrava.

### — **Education in Togo:**

We continued our long-standing relationship with the non-profit organization Togo Hilfe e.V. Our

latest donations have supported the construction of a professional training center for the youth, with an adjacent safe shelter for the female students.

### — **Christmas in Estonia:**

For the third year, CRONIMET Nordic organized a Christmas campaign to donate to children in foster care one Euro for every ton of metal purchased. Partnering with the Estonian Association of Child and Youth Welfare Institutions, the goal is to bring joy and support to those in need.

### — **Clubs in Karlsruhe:**

Once again, we held a campaign to support projects from our employees' local clubs. In 2024, the jury selected three initiatives in the following areas: diversity, discrimination, and emergency rescue.

### — **Supporting the youth:**

CRONIMET continued supporting the Instituto Fazendo História, an NGO in São Paulo that helps children and young people separated from their families by providing education, work, and social life to build a new personal story. In Santa Catarina, the support goes to the Musicarium in Joinville, an orchestra training center that develops young talents, and to a project to build a Center for Early Childhood Education in the city of Araquari.

## — GOVERNANCE

# ENSURING A RESPONSIBLE BUSINESS CONDUCT

Responsible and ethical conducts are essential to the CRONIMET way of doing business. Therefore, we have well-established governance structures including risk management, compliance, and internal controls. Furthermore, we have identified “responsibility in the supply chain” as a material topic in our business, thus it has been mapped into our ESRS Topic Management.

The whole governance team oversees our Guideline Management, ensuring that applicable laws are addressed in our internal policies and practices on topics like corruption, money laundering, and fraud.

### How we manage governance



#### — Risk Management

Our risk management strategies address economic uncertainties, such as fluctuating raw material prices and geopolitical challenges, ensuring our preparedness and adaptability. We conduct annual workshops between our central risk manager and the subsidiaries to identify, document, evaluate, and prioritize risks. We also systematically track the effectiveness of the measures used to manage them. In 2024, we started addressing the systematic analysis and assessment of sustainability risks by adding the topic of climate-related risk to our workshops. Our risk manager also supports the business continuity management activities and coordinates crisis management.



#### — Compliance

The compliance processes include the Code of Conduct adherence, regular compliance risk analyses with all subsidiaries, authorization of gifts and invitations, processing of whistleblower reports, and internal training. To ensure that our business partners meet our expectations, we screen all new suppliers according to our guidelines, along with a regular re-screening of the current ones. Additionally, all relevant sanction lists are monitored to ensure immediate action if necessary.



#### — Internal control system

Our internal control system identifies process weaknesses and required controls. It also oversees the implementation and testing of the defined controls.

# 48

ON-SITE TRAININGS

# 593

PARTICIPANTS IN COMPLIANCE TRAINING

# 1,499

BUSINESS PARTNERS SCREENED

# 38

PARTICIPANTS IN TRADER-SPECIFIC TRAINING

# 4X

INCREASE IN THE USAGE OF OUR WHISTLEBLOWER TOOL

## WOULD YOU LIKE TO MAKE A REPORT?

OUR WHISTLEBLOWER SYSTEM ALLOWS ANONYMOUS AND SECURE REPORTING VIA A DEDICATED PORTAL. THOSE PEOPLE WANTING TO RAISE CONCERNS ARE ASSURED PROTECTION AND CONFIDENTIALITY TO PREVENT ANY FEAR OF DISCRIMINATION.

[CRONIMET.WHISTLEBLOWNETWORK.NET](https://cronimet.whistleblownetwork.net)





## GOVERNANCE

# RESPONSIBILITY IN THE SUPPLY CHAIN

**In response to increasing legal and regulatory demands, stakeholder expectations, and our own convictions, we took significant steps to strengthen our supply chain governance before we are legally obliged to do so.**

In 2024, we secured external confirmation that we are on the right track: CRONIMET Ferroleq. GmbH was one of the first companies to obtain

confirmation from the Association of Waste Management Companies for the German Steel and Non-Ferrous Metal Recycling Industry (ESN) as compliant with the corporate due diligence obligations thus recognizing the requirements of the German Supply Chain Due Diligence Act. The assessment evaluated how we are working to avoid human rights and environmental violations in our own businesses and our supply chains.

## OUR PROGRESS IN 2024

PUBLISHED THE  
**POLICY STATEMENT**  
ON RESPECT FOR  
HUMAN RIGHTS AND THE  
ENVIRONMENT.

REVISED OUR  
**SUPPLIER CODE**  
OF CONDUCT.

STARTED A  
**TRAINING AND AWARENESS PROGRAM**  
ON HUMAN AND ENVIRONMENTAL  
RIGHTS, SUPPLY CHAIN ACT &  
DUE DILIGENCE OBLIGATIONS IN  
OUR OWN BUSINESS AREAS.

INTRODUCED A  
**SPECIALIZED AI-SUPPORTED SOFTWARE**  
SOLUTION TO MANAGE SUPPLY  
CHAIN DUE DILIGENCE-RELATED  
PROCESSES, INCLUDING AN  
ADVERSE MEDIA SCREENING OF  
BUSINESS PARTNERS AS WELL  
AS RISK ANALYSES AND SELF-  
DISCLOSURE QUESTIONNAIRES.







# SUSTAINABILITY STATEMENT





# GENERAL DISCLOSURES

— HOW WE ADDRESS  
STRATEGY AND  
GOVERNANCE ACROSS  
OUR SUSTAINABILITY  
TOPICS —

# BASIS FOR PREPARATION

## GENERAL BASIS FOR PREPARATION

### BP-1

Our sustainability statement was prepared on a consolidated basis in alignment with the financial consolidation scope and with reference to the European Sustainability Reporting Standards (ESRS). Some metrics do not cover entities which were acquired in 2024; this info will be stated in line with the disclosure.

CRONIMET has performed a double materiality assessment considering impacts, risks, and opportunities for our own operation and the main upstream and downstream elements. The scope of policies, actions, targets, and metrics varies depending on the nature of the topics.

We did not exercise the option to omit specific information related to intellectual property, know-how, or innovation results. Additionally, we did not apply for an exemption regarding the disclosure of impending developments or matters under negotiation, as allowed by certain EU member states under Articles 19a(3) and 29a(3) of Directive 2013/34/EU.

## DISCLOSURES ABOUT SPECIFIC CIRCUMSTANCES

### BP-2

In general, we follow the time horizons proposed by ESRS 1 section 6.4. when analyzing impacts, risks, and opportunities. However, strategic targets are defined for fixed years, such as 2030 for our internal strategy process and 2034 for SBTi's near-term target.

## — VALUE CHAIN ESTIMATIONS AND SOURCES OF ESTIMATION AND UNCERTAINTY:

Our Scope 3 GHG emissions include upstream and downstream value chain data estimated using indirect sources, such as sector-average data or other proxies. This information is disclosed along with the CO<sub>2</sub> accounting in **E1-6**. Using these indirect sources results in some degree of uncertainty, which we aim to decrease by using direct data wherever available and continuously improving our data collection processes. There is no information regarding uncertainties linked to other material to be included.

## — CHANGES IN PREPARATION OR PRESENTATION OF SUSTAINABILITY INFORMATION:

In our 2024 Sustainability Reporting, we transitioned from GRI to ESRS and changed the

report's scope to full consolidation. Revised comparative figures with details about CO<sub>2</sub> emissions are disclosed.

## — REPORTING ERRORS IN PRIOR PERIODS:

During the further development of the CO<sub>2</sub> accounting processes, CRONIMET has identified discrepancies in prior periods, due to extended reporting scopes and minor incorrect consumption values. We provide corrections for each prior period included in this sustainability statement, with relevant updates in **E1**.

## — OTHER LEGISLATIONS APPLIED:

The information about EU Taxonomy can be found on [page 41](#).

## — INCORPORATION BY REFERENCE:

CRONIMET did not incorporate any information by reference.

## — MATERIAL TOPICS OMITTED:

No material topics have been omitted by CRONIMET in this sustainability statement.

# GOVERNANCE

## THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT, AND SUPERVISORY BODIES

### GOV-1

Our Management Board consists of five non-independent executive members, one of whom is female (equivalent to 20% of the Board's composition). In addition, Günter Pilarsky, a minority shareholder and founder, remains officially listed as a Managing Director of CRONIMET Holding GmbH in the trade register. However, he no longer manages or steers the company but remains an important advisor. The Board does not have employee representation.

The members possess expertise in critical areas, including supply chain management with an emphasis on environmental sustainability, finance, human resources, IT, and extensive experience in the scrap business. As of January 1, 2024, two new colleagues were promoted to the Management Board, bringing in-depth operational (COO) and technical (CTO) knowledge for strategic decision-making.

Together with Jürgen Pilarsky (CEO and majority shareholder), Bernhard Kunsmann (CFO), and Annette Gartner (CIO/CHRO), they are



leading CRONIMET safely through the current geopolitical uncertainties while continuing to develop in our challenging markets. Each member of the Management Board also contributes to the oversight of impacts, risks and opportunities within a responsibility matrix that assigns clear roles for various topics, including all sustainability-related matters.

To maintain up-to-date knowledge, the governance body continuously engages with:

- Industry associations and events related to sustainability, circular economy, finance, and HR.
- Internal and external stakeholders, including employees, local managing directors, customers, suppliers, financial partners, and regulatory authorities.
- Internal expert briefings to support ongoing learning.

ROLES AND RESPONSIBILITIES OF THE MANAGEMENT BOARD

Management Board member	Sustainability expertise	Material Impacts responsibility
Jürgen Pilarsky (CEO)	Over 30 years of experience in the scrap business, stakeholder management, supply chain expertise, and strategic planning focused on long-term environmental sustainability.	E5 – Circular Economy
Annette Gartner (CIO/CHRO)	Specialist in human resources and IT, with a strong focus on social responsibility.	S1 – Own Workforce (HR Expert)
Bernhard Kunsmann (CFO)	Finance and corporate governance expert, with a deep understanding of global economic impacts.	G1 – Responsible Supply Chain Management
Marijo Zeljko (COO)	Extensive experience in scrap business operations, scrap and metal markets, and yard electrification technologies.	E1 – Climate Change E5 – Circular Economy S1 - Own Workforce (Occupational Health & Safety and ISO Expert)
Leandro Campos (CTO)	Over 20 years in the metal industry, with expertise in ferroalloy production, metallurgy, and process optimization.	E5 – Circular Economy

Although we don’t have an administrative or supervisory board, our governance includes two additional structures to the Management Board, one external advisory board and another internal, established in 2023. The external board is solely advisory, which explicitly excludes any liability. The advice it provides extends mainly to strategic issues and the validation of projects and planning. The internal Strategic Management Advisory Board (SMAB) is a group-wide committee comprising the five members of the Management Board and further representatives of regions, products, and holding functions. We expect the internal advisory board to support increased transparency and collaboration, enabling us to make even better use of synergies. This team also advises on strategic topics and supports our ongoing strategy process.

All of our sustainability activities are monitored centrally by the Sustainability Team, which has the mandate of the Management Board to oversee impacts, risks, and opportunities. Our Head of Sustainability Management reports directly to the Board. Besides the central team, we have also established a global sustainability network with points of contact, as the management of specific impacts, risks, and opportunities is assigned to Managing Directors of Subsidiaries, Heads of Departments, or other non-executive positions. Therefore, we ensure that an expert in the field handles each topic.

This approach allowed us to create the needed transparency and is the foundation for working toward meeting our sustainability goals and compliance with the Corporate Social Responsibility Directive (CSRD).

The process is overseen by the Management Board, which provides input and expertise for identifying and managing environmental and social impacts. It is also responsible for approving the processes related to identifying and managing sustainability issues, ensuring engagement with stakeholders for informed decision-making.

### Overview of governance processes and controls

#### Reporting Lines:

- Governance includes weekly meetings (Jour Fixes), ad hoc reporting as needed, and annual reports.
- An open-door policy facilitates internal communication.

#### Controls and Procedures:

- A comprehensive internal control system for sustainability reporting is in place.
- Further sustainability-related controls are under development to enhance governance processes.

#### Target Setting and Monitoring:

- ESRS-compliant target setting and reporting is currently under development.
- Material impacts, risks, and opportunities (IROs) will be considered within the strategic planning process and integrated into the company's general target system.

#### G1 GOV-1

Our management bodies oversee our business conduct, particularly concerning human rights and environmental due diligence obligations. Both corporate commitments and regulatory requirements drive these responsibilities.

The Management Board of CRONIMET Holding GmbH is responsible for the Group's due diligence obligations, including defining management structures, appointing the responsible personnel, including the Chief Compliance Officer and Supply Chain Due Diligence Officer, and determining the composition of the Human Rights Committee. Additionally, the Board is tasked with monitoring and controlling the activities of responsible staff members and departments, receiving updates on their work and results at least once per year.

The Human Rights Committee includes the Supply Chain Due Diligence and Chief Compliance Officer. The former coordinates

the integration of tactical and operational responsibilities related to due diligence obligations into the workflow of responsible employees and departments.

### INFORMATION ON SUSTAINABILITY MATTERS

#### GOV-2

Our management body is regularly informed about material impacts, risks, opportunities, and the implementation and effectiveness of related policies, actions, metrics, and targets. There is a regular exchange between internal sustainability experts and the board members responsible for each topic. Additionally, there is a formal reporting process at least once a year, with more frequent updates if required. The mechanisms also include Jour Fixes updates on impact management, with ad hoc reports as needed, and the supervision and approval of newly identified impacts and their management processes.

The Management Board considers impacts, risks, and opportunities in evaluating our operational scenarios, significant transactions, and risk management processes.

This includes active stakeholder engagement to gather insights that inform decision-making,

thus influencing strategic directions and risk assessments. We have established key performance indicator (KPI) reporting and conduct an annual financial risk assessment to monitor economic indicators. Strategy reviews are carried out by the Management Board and senior management to ensure the organization is prepared for emerging challenges.

Additionally, plans are in place to integrate climate-related financial damage assessments into the risk management process, aligning with group-wide risk management practices.

During the reporting period, we updated the materiality assessment, and the Management Board maintained regular exchanges with responsible departments regarding material impacts, risks, and opportunities.

### INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

#### GOV-3, E1 GOV-3

In the reporting period, the percentage of remuneration linked to climate-related considerations was 0%. However, from 2025 onward, we will gradually start to integrate the achievement of climate-related targets for Scope 1 and 2 emissions into the incentive



STATEMENT ON DUE DILIGENCE GOV-4

Core elements of due diligence	Pages in the sustainability statement
Embedding due diligence in governance, strategy and business model	Present in GOV-2, GOV-3 and SMB-3
Engaging with affected stakeholders in all key steps of the due diligence	Present in GOV-2, SBM-2, IRO-1 and applicable MDR-Ps
Identifying and assessing adverse impacts	Present in IRO-1 and SBM-3
Taking actions to address those adverse impacts	Present in applicable MDR-As and in topical standards that discuss actions and action plans
Tracking the effectiveness of these efforts and communicating	Present in applicable MDR-Ms and Topical ESRS regarding metrics and targets

schemes of our management directors. This will affect subsidiaries with operating yards or processing facilities. Additionally, certain subsidiaries will work on targets regarding ISO certification rollouts.

Targets are set annually and involve implementing one or more measures. They are aimed to support the achievement of our emission reduction targets and standardize our environmental and energy management across the Group. Managing directors of subsidiaries that have already met targets in a given field will not receive additional targets.

RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING GOV-5

The risk management and internal control processes related to sustainability reporting are structured within the Internal Control System (ICS). They include the identification of high-risk processes within departments, the definition of process risks, and the identification or establishment of appropriate controls. Each control is documented in a specialized software, including details on cause, objective, responsibility, description, control frequency, and control evidence.

Additionally, the ICS team conducts frequent testing to ensure compliance and effectiveness. The risk assessment and prioritization approach involves a joint expert evaluation by the Head of Sustainability Management and the Internal Control System Manager.

The findings from risk assessments and internal controls are integrated into internal functions and processes, ensuring continuous

improvements when controls are deemed insufficient. The effectiveness of controls is evaluated through ICS testing, which includes a test of design and a test of effectiveness based on evidence samples. The effectiveness test is expanded to include random sample testing for critical controls. The reporting of findings occurs through a weekly Jour Fixe meeting with the CEO, where the current status and key findings are reviewed and discussed.

IDENTIFIED RISKS ON SUSTAINABILITY REPORTING AND MITIGATION STRATEGIES

Risk	Mitigation	Control
There are inaccurate calculations and analyses.	Training and briefing of internal colleagues providing the data; involvement of external consultants.	Actual comparison between ESRS standards and the final report. Corrective action before approval in case of deviations.
The sustainability statement is non-compliant with the ESRS standards.	Internal training within the Sustainability Management Department and the use of consulting tools.	Plausibility check with focus on ESRS standards using the four-eyes principle.
The sustainability statement fails to represent current and future CRONIMET's requirements.	Early involvement of external consultants and auditors.	Initial Double Materiality analysis and regular or event-driven reviews, conducted through discussions with specialist departments using the four-eyes principle.

# STRATEGY

## STRATEGY, BUSINESS MODEL, AND VALUE CHAIN SBM-1

The CRONIMET Holding Group, headquartered in Karlsruhe, Germany, is a global specialist in stainless steel scrap and ferroalloys, focusing on returning metallic raw materials to the materials cycle through recycling and processing. This approach contributes to securing raw resources and enhancing their efficiency. We recover material from a diverse spectrum, including stainless steel, HSS/CrMoV, tungsten carbide, titanium, super and special alloys, ferroalloys, new metals, pure metal scrap, and soft scrap.

Our own expertise within the Recycling Division lies in separating, sorting, analyzing, and blending secondary metallic materials. Upstream in our value chain, we have established trustworthy business relationships with many smaller scrap dealers through our global trade network, ensuring supply chain stability. A few big customers, mainly steel mills, form our downstream value chain, connected via our central and local sales teams. We don't maintain direct business relationships with end-user customers. The significant markets we serve are primarily the stainless steel mills across

Europe, the U.S., Brazil, and South Africa. We also engage in various processing activities, including ferromolybdenum and ferrotungsten. In 2024, we also started producing ferrotitanium and cored wire. Our ferrotungsten production is supported by processes and policies in accordance with the Responsible Minerals Initiative (RMI) and EU regulations. Tungsten is considered a conflict material in some jurisdictions; thus, we work diligently to ensure compliance. Our raw material refining processes involve milling, sieving, and other reworking techniques.

Furthermore, in line with our strategic increased penetration into sustainability-driven markets, we have initiated activities in battery recycling. At our site in Bitterfeld-Wolfen, Germany, we are already able to fully discharge cells, modules, and packs until they are electrochemically inactive. This is the first crucial step in preparing batteries for the subsequent processing steps, which we have started developing.

The activities in our Recycling Division can be mapped to the ESRS sector "E 38.21 Material Recovery" within the Water and Waste Sector. The revenue deriving from this activity represents the largest share within our revenue streams. On the other hand, our processing activities fall under "C 24.10 Manufacture of basic iron and steel and

of ferroalloy" within the Metal Processing sector. Through our business model, our customers benefit from the use of recycled materials that help them lower their CO<sub>2</sub> footprint by substituting primary raw materials. For investors and banks, CRONIMET represents a unique opportunity to put resources in a sustainable business model, reinforcing the commitment to circular economy principles and long-term environmental responsibility. See our value chain visualization chart on [page 26](#).

In 2021, we defined medium-term sustainability goals for 2025, which apply globally across the group. These include the contribution to the development of green products, ambitious CO<sub>2</sub> reduction and the establishment of a detailed sustainability reporting. We made significant progress in achieving these goals through various actions:

- We started partnerships with customers and joined initiatives supporting the green transformation of the stainless steel industry and strengthening the circular economy.
- We established CO<sub>2</sub> accounting processes across all scopes. In 2024, we developed our climate action plan to steer the achievement of our targets, which were validated by the Science-Based Targets

Initiative (SBTi). More information on [E-1](#).

- As of 2024, we implemented a sustainability reporting process, following the GRI framework, before transitioning to the European requirements to ensure stakeholders are well-informed about sustainability-related activities. We are developing our 2030 strategy and goals, ensuring future alignment with ESRS compliance.

In addition, our Recycling Division is exploring opportunities with customers to increase the use of recycled materials while maintaining economic viability in scrap utilization. Within our Processing Division we focus on enhancing value creation downstream our value chain.

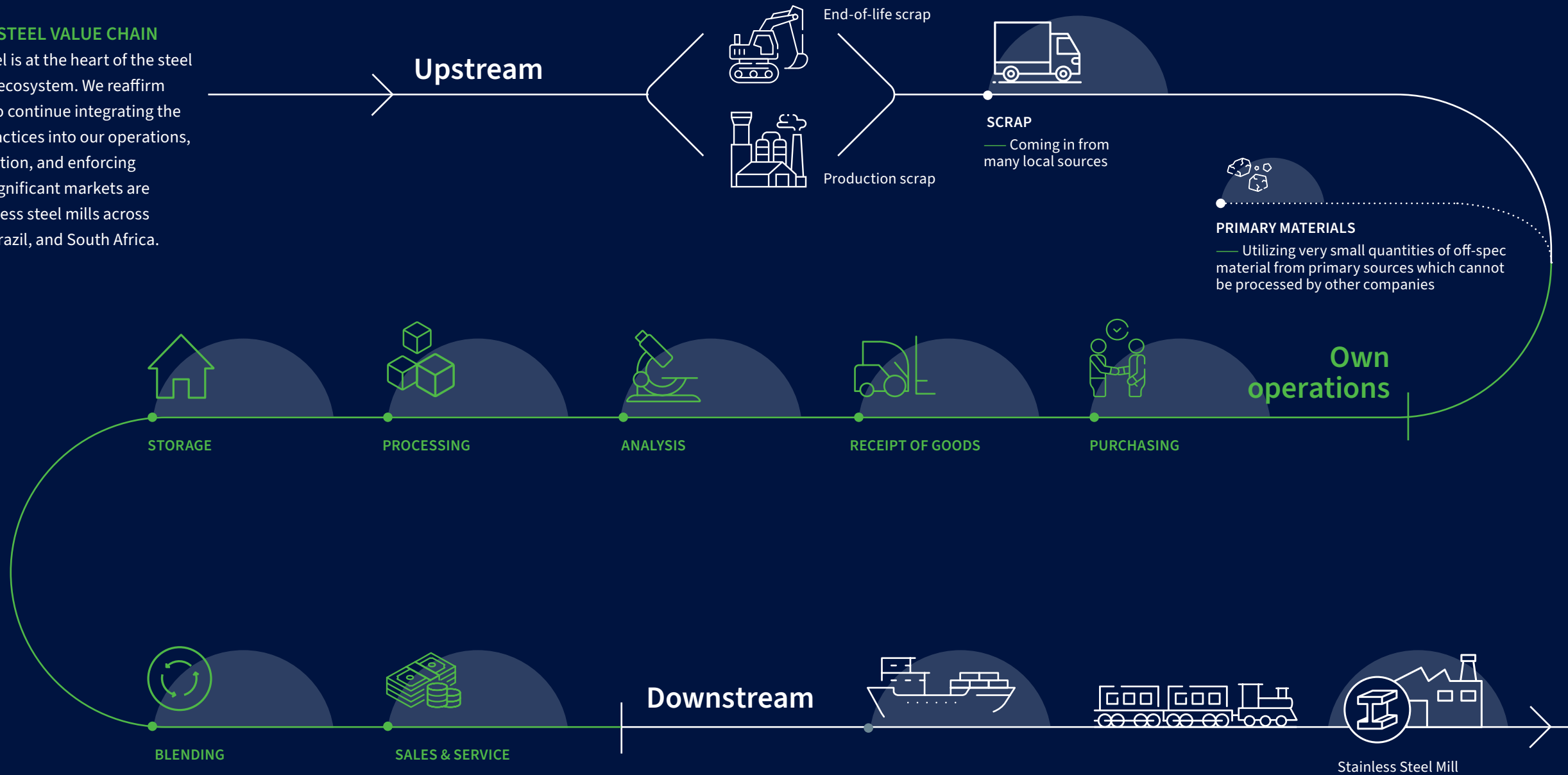
## HEADCOUNT OF EMPLOYEES BY GEOGRAPHICAL AREAS AT THE END OF 2024

Geographical areas	Number of employees
Germany	511
Europe without Germany	474
North America	320
South America	203
Africa	75
Asia & Australia	240
<b>TOTAL</b>	<b>1,823</b>



## OUR STAINLESS STEEL VALUE CHAIN

Our business model is at the heart of the steel industry's circular ecosystem. We reaffirm our commitment to continue integrating the most advanced practices into our operations, fostering collaboration, and enforcing compliance. Our significant markets are primarily the stainless steel mills across Europe, the U.S., Brazil, and South Africa.



INTERESTS AND VIEWS OF STAKEHOLDERS

SBM-2, S1 SBM-2

We engage actively with our key stakeholders to ensure their views and interests are integrated into our strategy and business model. Key stakeholders include customers, employees, banks, shareholders, suppliers, and service providers.

We consider our employees’ interests, views, and rights particularly significant, hence their acceptance is a key criterion in strategic decision-making. Our approach to human rights and related considerations is outlined in our policies referenced in S1-1.

Members of the Management Board maintain regular contact with key stakeholders in their respective areas of responsibility. This direct engagement ensures that stakeholder views regarding sustainability-related impacts are continuously communicated and integrated into the decision-making process, supporting alignment with our sustainability strategy and objectives.

No amendments to the strategy or business model are necessary at this stage to address the views and interests of the stakeholders. The stakeholder assessments will continue to be reviewed as part

of the regular materiality check. These reviews are not expected to modify the relationship with stakeholders or their perspectives on our company.

STAKEHOLDERS IDENTIFIED THROUGH OUR DUE DILIGENCE AND MATERIALITY ASSESSMENT

Key stakeholder	Engagement	Views and interest	Influence on strategy and business model
Customers	Engagement with our European customers is managed through the Central Sales Department, complemented by regular online meetings, site visits, and strategic partnerships with key accounts. These efforts aim to build trustful business relationships and ensure stable sales.	Customers emphasize the need for materials that reduce their CO <sub>2</sub> footprint and favor cost-effective solutions.	The feedback and requirements from customers directly influence our strategy, as we continuously seek to support them in meeting their needs.
Employees	Employees are considered the company’s most valuable asset, and their engagement involves direct visits from management, employee surveys, annual feedback reviews, and internal communication tools such as the oneCRONIMET App. These activities provide opportunities to exchange information, share ideas, and identify areas for improvement.	Employees prioritize secure employment relationships, regular income, and meaningful work.	Employee feedback is a critical factor in evaluating strategic options, as their acceptance of decisions is essential for implementation.
Banks	Banks are engaged through annual meetings, monthly reports, and regular exchanges with the CFO and Corporate Finance Department. These interactions ensure stable financing for the company.	They focus on investing in sustainable companies while ensuring compliance with regulatory and anti-financial crime standards, all subject to a reasonable credit risk.	The feedback supports the adoption of best practices.
Shareholder	The majority shareholder, who is also a member of the Management Board.	The shareholder aims for long-term sustainable success and contribution to a fair and sustainable life.	The majority shareholder is deeply involved in strategy formulation, particularly concerning sustainability, and corporate culture. His perspective sets the direction of the company’s long-term goals.
Suppliers	Suppliers and service providers are engaged through personal contact via the global trader network, integrated into daily business operations. This engagement ensures trustworthy relationships and secures scrap sourcing.	They highlight the importance of transparency, fair pricing, regional partnerships, and CRONIMET's sustainability-driven leadership.	Feedback is incorporated into routine business practices.



MATERIAL IMPACTS, RISKS, OPPORTUNITIES, AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

SBM-3

We reviewed our assessment of material impacts, risks, and opportunities compared to the previous reporting to ensure complete alignment with ESRS. The process is explained in IRO-1.

As a result, the following topics (table below) have been considered material. Please refer to the “Material Topics” chapters for additional insights on how the IROs interact with our strategy and business model.

As a key player in the circular economy, and due to our numerous actions and initiatives to address the material IRO, we expect our strategy and business model to be resilient to any upcoming challenges. While there is an ongoing resilience analysis in our established processes, we are planning to extend this further in the future to address and incorporate the ESRS-specific requirements.

Topic	Financial Materiality	Impact Materiality
Climate change - Climate change adaptation	x	
Climate change - Climate change mitigation	x	x
Climate change - Energy	x	
Circular economy - Resources inflows, including resource use	x	x
Own workforce - Working conditions - Health and safety		x
Own workforce - Working conditions - Secure employment	x	
Business conduct - Management of relationships with suppliers	x	x

IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

PROCESS TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

IRO-1

Our initial materiality assessment was conducted in 2021, using the GRI methodology through internal workshops with experts and external consultancy support. In 2023, the study was expanded to include a double materiality, incorporating interviews from internal and external stakeholders.

In 2024, to ensure full ESRS compliance, prior findings were mapped with ESRS 1 AR16 sub-topics and further detailed and evaluated with internal experts according to the EFRAG implementation guidance for Material Assessment. As such, we considered impacts, risks, and opportunities (IROs) related to our operation and our up- and downstream value chain. The views of our stakeholders were considered either through interviews conducted in the past with their

representatives or via proxy stakeholders (internal experts). Each IRO was mapped to the value chain area and the relevant time horizon.

The analysis mainly involved European stakeholders and experts active in global operations. Given the similarity of recycling business processes worldwide, the findings are assumed to reflect the global picture. No specific areas were excluded from the Materiality Assessment. However, there was a focus on the core business of recycling, particularly with regard to the impact assessment. We consider extending the assessment to include a specific review of processing activities during the next materiality review.

Once developed by the Sustainability Management team, in collaboration with stakeholders and internal experts, the materiality assessment proposal is formally approved by the board. As for the internal control system, we applied the four-eyes principle between sustainability management and our internal experts.

Overall, sustainability risks are incorporated into general risk reporting, which categorizes risks into various subcategories, including People & Environment. They are discussed annually in risk workshops, where triggers, damages,

and mitigation measures are reviewed. At the same time, opportunities are fully integrated into our overall management process, ensuring alignment with corporate strategies. The risk manager is closely involved in the Materiality Assessment to ensure consistency between the Materiality Assessment and the general Risk Management process.

From 2025, climate-related risks will be integrated into the annual risk workshop discussions.

1. Defining Impact Materiality:

The following criteria have been considered when evaluating impact severity on people and the environment.

		Impact type			
Criteria	Scoring system	Actual positive	Actual negative	Potential positive	Potential negative
Scale	very low (1) to very high (5)	x	x	x	x
Scope	very low (1) to very high (5)	x	x	x	x
Remediability	very low (1) to very high (5)		x		x
Likelihood	very unlikely (0.1) to very likely (0.9)			x	x

An ESRS Subtopic is selected if at least one impact is considered material. Impacts are considered material if they exceed a predefined threshold for Impact Severity.

2. Defining Financial Materiality:

As for the financial effects, the risk and opportunity assessment follows the CRONIMET Group’s existing risk management framework, thus ensuring consistency. The assessment methodology is based on experience and expert judgment, integrating previous risk assessments with input from our risk manager. The thresholds from the Risk Management System are applied consistently. In order to assess the financial materiality, the likelihood is scaled from very unlikely to very likely

and the magnitude on a range from 1 to 5 depending on the financial impact.

An ESRS Subtopic is considered relevant if at least one risk or opportunity is considered material. A risk or an opportunity is considered material from a financial perspective if it exceeds a predefined threshold for Financial Materiality.

3. Establishing Double Materiality:

If there are both material impact and risks or opportunities, the topic meets the double materiality.

CLIMATE CHANGE

E1 IRO-1

Starting with our annual risk management cycle 2024/25, we are including the identification of climate-related physical risks. As part of this effort, the central risk manager conducts workshops with each subsidiary and engages with the managing directors of the individual CRONIMET Group companies to assess potential risks. External data sources like the WWF Risk Filter have also supported this initial evaluation.

Based on current knowledge, the preliminary assessment suggests that our business activities and overall business model are not

significantly impacted by chronic climate change risks, remaining resilient in the face of evolving environmental challenges. However, a detailed, comprehensive analysis regarding our ability to adapt our strategy and business model has not yet been completed. The goal is to align the time horizon for climate risks with the ones defined in BP-2.

POLLUTION

E2 IRO-1

The identification of pollution-related impacts, risks, and opportunities is integrated into ISO 14001 certification where applicable and into the annual risk assessment process, which is conducted for all subsidiaries. These evaluations ensure compliance with strict regulatory requirements to minimize potential negative impacts.

In our operations, we don’t have any sites where pollution is considered a material issue, as compliance with the national and international environmental regulations effectively mitigates risks. The upstream assessments are covered in our supply chain due diligence disclosures. In contrast, the downstream value chain assessment is still outstanding.



## WATER AND MARINE RESOURCES

### E3 IRO-1

We assessed the related impacts, risks, and opportunities through internal expert evaluations. The assessment concluded that the consumption of purchased water is minimal across the Group. As a result, the topic has been deemed not material. Additionally, some subsidiaries are located near water bodies to facilitate material transportation via vessels, with flooding risks addressed in the climate risk analysis.

Also, due to the nature of our business model, which focuses on secondary materials, the input materials do not pose a risk to marine life, nor does the company extract marine resources. A formal assessment following the LEAP approach has not yet been conducted.

## BIODIVERSITY AND ECOSYSTEMS

### E4 IRO-1

We have not identified direct material impacts on biodiversity within our operations. The existing externally certified environmental management systems ensure our compliance with environmental standards, and biodiversity has not been raised as a concern at our sites. However, purchasing primary materials has an indirect

impact, though these transactions represent only a small fraction of our overall tonnages.

A comprehensive biodiversity assessment in line with the ESRS requirements is planned. It will cover dependencies on biodiversity and ecosystem services and potential risks and opportunities arising from biodiversity-related factors. Systemic risks, transition, and physical risks, as well as the potential disruption of ecosystem services, will also be evaluated.

## RESOURCE USE AND CIRCULAR ECONOMY

### E5 IRO-1

Our materiality assessment identified “Circular Economy” as a material company-specific topic as it is the core of our business model. For more details, refer to **SBM-1**. The resource inflow aspect applies partially to us and has been included in this sustainability statement. We aim to report the share of recycled input material to demonstrate our contribution to the circular economy.

Due to the very low quantities relative to overall tonnages, waste is not considered material. Regarding resource outflows, the ESRS disclosures focus on how companies contribute to the circular economy through product design that is aligned with circular principles and waste recirculation after first use. As a recycling

company, these aspects are not applicable, as we do not design products, and waste generated from operations is minimal.

No specific engagements or consultations have been conducted with affected communities for any of the topics.

## DISCLOSURE REQUIREMENTS IN ESRS COVERED BY THIS SUSTAINABILITY STATEMENT

### IRO-2

Our analysis concluded that the disclosures listed in the index were deemed material for the purpose of this sustainability statement.

We also determined that certain other topics are not material and, therefore, we omitted all Disclosure Requirements associated with those corresponding topical ESRS. The materiality assessment concluded that the Impact Severity and Financial Severity for the following topics were below the predefined threshold for materiality as per the methodology outlined in **IRO-1**:

- ESRS E2 - Pollution
- ESRS E3 - Water and Marine Resources
- ESRS E4 - Biodiversity and Ecosystems
- ESRS S2 - Workers in the Value Chain

- ESRS S3 - Affected Communities
- ESRS S4 - Consumers and End-Users

The complete ESRS Index Table with the disclosures covered in this sustainability statement is available on [page 59](#).



# ENVIRONMENT

— CIRCULARITY IS AT THE HEART OF OUR BUSINESS MODEL, DRIVING RESOURCE EFFICIENCY AND TACKLING THE CLIMATE CHANGE CHALLENGES IN THE STEEL INDUSTRY. —



# E1 CLIMATE CHANGE

## STRATEGY

### MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES SBM-3

Sub-topic	Impact, Risk or Opportunity	Description	Value Chain	Time Horizon
Climate change adaptation	Risk	<b>Climate adaptation risk analysis:</b> Systematic analysis of climate adaptation risks is outstanding. See <a href="#">E1 SBM-3</a> .	Own operation, upstream, and downstream	Short, medium and long terms
Climate change mitigation	Actual Positive Impact	<b>Reduction of GHG emissions in the steel industry:</b> Reprocessing secondary raw materials reduces the need for mining and processing primary raw materials in the steel industry, lowering energy consumption and greenhouse gas emissions. The impact is positioning CRONIMET as a critical enabler of emissions reductions in the steel industry while supporting sustainability-driven market demand for low-carbon production solutions.	Upstream and downstream	Short, medium and long terms
	Actual Negative Impact	<b>Scope 1 GHG emissions:</b> We commonly use fossil energy sources such as natural gas, LPG, diesel, and gasoline. These Scope 1 GHG emissions contribute to global warming, climate change, and their resulting consequences. Electrification has been identified as the key solution to reduce our fossil fuel dependency.	Own operations (yards operations)	Short and medium terms
	Actual Negative Impact	<b>Scope 2 GHG emissions:</b> Procuring electricity from fossil fuels contributes negatively to our Scope 2 GHG emissions, which worsen air quality and contribute to climate change. By switching to green electricity, we aim to significantly reduce this impact.	Own operations change (yards operations)	Short and medium terms
	Actual Negative Impact	<b>Scope 3 GHG emissions:</b> The following activities related to our Scope 3 GHG emissions contribute to climate: purchasing primary metals, material transport and the processing of material sold at our customers. Addressing these emissions requires a collaborative approach, integrating supply chain optimization, green logistics, and sustainable production methods.	Upstream and downstream	Long term
	Risk	<b>Cost for electrification of the operation:</b> A high investment is needed to achieve the electrification of our operation. The financial effects of material risks and opportunities for climate change mitigation remain under evaluation as detailed investment planning is ongoing. However, relevant cost-related risk considerations are addressed in <a href="#">E1-1</a> .	Upstream, own operations, and downstream	Short, medium and long terms
Energy	Risk	<b>Costs for energy transition:</b> Uncertain development of energy cost regarding both fossil and non fossil sources is impacting the transition from conventional energy to renewable sources. Furthermore, we are investing in the production of renewable energy at our site.	Own operations	Short and medium terms

## CLIMATE CHANGE ADAPTATION: INTERACTION WITH STRATEGY AND BUSINESS MODEL

### E1 SBM-3

A detailed, comprehensive analysis regarding our ability to adapt our strategy and business model has not yet been completed (see **E1 IRO-1**). The planned assessment will clarify the necessary adjustments to mitigate the impacts and enhance our resilience. Hence, this gap of preparedness limits transparency regarding the financial effects in our business model. Our preliminary analysis shows that potential risks may include acute heatwaves, cold waves, strong winds, floodings, and droughts. No significant impact from chronic physical risks has been identified so far.

We identified potential financial impacts from higher CO<sub>2</sub> pricing, which can potentially increase operational costs. CRONIMET activities do not fall into the energy intensive sectors, so our exposure to such pricing mechanisms is limited to our purchasing decisions from these sectors. Moreover, considering the critical role of scrap-based stainless steel in producing many transition-enabling products, we view this transition more as a market opportunity than a significant risk. Likewise, an emerging focus on climate-friendly innovations can be a potential opportunity for CRONIMET, benefiting our sustainable recycling business.

## TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

### E1-1

We are in the process of developing a transition plan for climate change mitigation for the entire CRONIMET group, with many elements already completed. Our ongoing efforts are rooted in our commitment to limiting global warming to 1.5 °C by the Paris Agreement (CRONIMET is not excluded from the EU Paris-aligned benchmarks). The Science-Based Target Initiative (SBTi) has approved our targets, which can be found under **E1-4**.

Our climate action plan, approved by the Management Board, guides our activities toward target achievement. Below is a brief overview of our decarbonization levers. Details can be found in **E1-3**.

To drive successful decarbonization, we have integrative levers, including the development of organizational structures and processes, management-level oversight, and the allocation of resources:

- **STRATEGIC PRIORITIZATION**
- **EFFICIENCY MEASURES**

The emissions from our own operations primarily stem from operating our yard machinery, processing plants, fleet, and office buildings, which are Scope 1 and 2.

We are detailing the financial investment needed to transition to non-fossil operations. These investments subject to ongoing review to reflect technological progress as well as, among other things, the dynamic development of energy prices, interest rates, refinancing possibilities, and government funding opportunities. We currently plan substantial investments to decarbonize our operations until 2034.

These will affect the following levers:

- **ELECTRIFICATION**
- **SWITCH TO NON-FOSSIL ELECTRICITY**

The by far largest share of our emissions is in Scope 3. Within this scope, more than 80% stems from the processing of our material by our customers, for which we have very little control over reducing emissions. Other emissions stem from logistics and the purchasing of primary metals. A comparatively small share comes from waste treatment, business travel, and employee commuting. Our levers to address value chain emissions are:

## — PREFERENCE FOR LOW-EMISSION ALTERNATIVES IN PURCHASING DECISIONS — DECARBONIZATION ALONG THE VALUE CHAIN

Our business model is aligned mostly with taxonomy-eligible activities defined in Commission Delegated Regulation 2021/2139. See more on [page 41](#).

Most of our business activity happens in the Recycling Division, where we sort, blend, and refine scrap according to customer specifications. Another part refers to the Processing Division. Here we operate energy- and emission-intensive facilities, where metals are melted. Although our recently set up processing lines can be run emission-free, other processing facilities are much older and rely on fossil fuels, which cannot easily be replaced. Decarbonizing these assets is more challenging so that they can be considered to produce locked-in emissions. Decarbonization feasibility is currently being assessed for these plants. The results of this assessment will determine the way forward.



# IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

## POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

### E1-2 MDR-P

Several policies addressing climate change mitigation have already been put into place. Further guidelines will likely be developed in the future, spanning an additional range of areas, including climate change adaptation based on climate scenario analysis. The policies are aimed at guiding employee behavior, purchasing decisions, and operational practices toward reducing greenhouse gas emissions.

These policies are monitored through various mechanisms, including annual GHG accounting, management approval processes, a whistleblower process for misconduct detection, fleet purchasing reviews, and, where applicable, ISO certifications. Their scope encompasses CRONIMET's subsidiaries, employees, supply chain, and, where applicable, stakeholders such as customers and suppliers. Exceptions are limited and must be approved by relevant

senior management, ensuring the policies are implemented as effectively as possible. The Management Board is the most senior level accountable for implementing these policies.

Key stakeholder interests, as defined in **SBM-2**, are considered in the policy-setting process. Proxies representing stakeholders are included during policy approval and iterative development to ensure alignment with stakeholder expectations. The final documents are available to employees via the intranet, internal communication systems, and document management tools. At the same time, our website provides external stakeholders access to the Code of Conduct and the Policy Statement on Respect for Human Rights and the Environment.

### — STRATEGIC PRIORITIZATION

- Our Code of Conduct states our objective of minimizing environmental impact and adhering to environmental protection laws.
- Our Policy Statement on Respect for Human Rights and the Environment documents our unconditional commitment to human rights and environmental protection, which extends to our supply chain and operations. It also reflects our commitment to the 2015 Paris Climate Agreement.

### — SWITCH TO NON-FOSSIL ELECTRICITY

- Our Purchasing Policy for non-fossil electricity, enacted in 2022, mandates that all electricity contracts be renewed with non-fossil energy sources. Where the availability of non-fossil electricity from the grid is limited, capacities for self-production ought to be maximized.

### — EFFICIENCY MEASURES

- Our Energy Policy outlines principles for reducing energy use. It is part of our integrated management handbook, which applies to all subsidiaries and is aligned with ISO 50001 standards for energy management.
- Our environmental policy specifies our understanding that energy and raw materials are to be used as sparingly as possible. The policy is part of our integrated management handbook, which applies to all subsidiaries. It emphasizes avoiding environmental impacts such as emissions, noise, waste, and wastewater and, where this is not feasible, to minimize them as much as possible. It applies to all subsidiaries and is aligned with the ISO 14001 standard for environmental management.

### — PREFERENCE FOR LOW-EMISSION ALTERNATIVES IN PURCHASING DECISIONS

- Our Travel Policy for German subsidiaries, introduced in 2023, encourages employees

to prioritize ecological and economic considerations when planning trips, favoring rail travel over road and air travel, and adopting cost-effective, low-emission accommodations.

### — ELECTRIFICATION

- Our Purchasing Policy for Machinery and Vehicles, introduced in 2024 by executive management order, ensures that no fossil-powered machines or vehicles will be bought or leased to run beyond 2029, with exceptions requiring COO approval.
- Our Mobility Policy, launched in 2024, mandates the purchase of electric vehicles for company use and promotes public transportation and bike leasing. It applies specifically to German subsidiaries and will be rolled out to further countries as charging opportunities extend.

### — DECARBONIZATION ALONG THE VALUE CHAIN

- Our established Quality Assurance processes continue to ensure adherence to the requirements of our customers, allowing them to use our scrap in their production instead of primary metals.

## ACTIONS AND RESOURCES TO CLIMATE CHANGE POLICIES

E1-3 MDR-A

### Actions to date

#### These are the reductions already achieved:

**Scope 1 and 2:** -28.9% since the base year 2021

Out of the total reduction in Scope 1 and 2 emissions, a large share resulted from the restructuring of our subsidiary in Armenia and is not permanent. Excluding these temporary effects, our overall reductions amount to approximately 11.2%

**Scope 3:** -11.4% since base year 2023

#### These are the actions we have taken so far:

Some of them are ongoing initiatives based on manifold decisions our Management Board has made to drive the necessary change since 2021.

#### — STRATEGIC PRIORITIZATION

• Our Sustainability Management department, with expertise in climate-related matters, was established in 2022. It has worked to extend the possibilities of monitoring emissions and tracking progress while developing our Climate Action Plan.

- Our central expert Group, “Team Technics”, was tasked in 2021 to help subsidiaries across Europe with the decarbonization of scrap yards and has developed customized solutions in cooperation with the local management since then.
- At our annual General Management Conference in previous years and 2024, Group and subsidiary management gathered to discuss our commitment to reducing emissions and align on implementing measures across all scopes.
- Our Chief Operations Officer holds responsibility for the decarbonization of our Recycling Division in Europe and pushes the topic of electrifying operations regularly in meetings with subsidiary management.
- Our Chief Technology Officer is responsible for assessing the decarbonization possibilities of our Processing facilities.
- Our Management Board is committed to dedicating financial resources to decarbonizing CRONIMET’s operations across business divisions.

#### — EFFICIENCY MEASURES

- Energy efficiency initiatives are conducted annually. Several subsidiaries implement the methods defined by ISO 50001 and ISO 14001. Additionally, 35 operational sites currently hold ISO 14001 certification, resulting in coverage of 56%. Their initiatives led to decreased energy consumption due to the measures taken.
- In the spirit of our quality management

principle of continuous improvement, we constantly work on making processes more efficient, reducing our consumption of energy and material. This approach also entails awareness initiatives and training.

#### — ELECTRIFICATION

- “Team Technics” helped develop “Big Pictures” to electrify all European yards. This initiative increased their readiness for the electrification of yard machinery, which will reduce diesel consumption in the future.
- More on-site charging stations were set up, so that more of our employees will choose electric vehicles over fossil-fueled ones to decrease emissions from travel and commuting in company cars and private vehicles.
- We continued to electrify our company car fleet, which decreased emissions. At the end of 2024, 24% of company cars were electric (hybrids were counted as being 50% electric).
- Many subsidiaries have heated and cooled their buildings with fossil-free technologies for years, while others have switched recently. Of all the locations that need climate control, 42% already use non-fossil options such as heat pumps, district heat, and air conditioners. This avoids and reduces emissions from oil and gas.
- Many yards have already started to exchange fossil-fueled machines for electric alternatives to work toward emission-free operations. The

switch to electric forklifts has been continuously pursued for about a decade. In contrast, the market launch of electric excavators, shunters, and loaders that meet our requirements is a recent development. We have been testing market innovations among these machines since 2022 and share experiences across the Group to enhance investment decisions. This is where we stand with the electrification of our mobile yard machinery at the end of the reporting year:

- 33% forklifts
- 25% shunters
- 5% excavators
- 3% loaders

#### — SWITCH TO NON-FOSSIL ELECTRICITY

- Subsidiaries and yards continue to switch their electricity contracts to non-fossil sources, thus reducing emissions. At the end of 2024, 21 out of 62 yards and plants had switched to purchasing non-fossil electricity. This addition raised the share of non-fossil electricity within our overall consumption to at least 43%. The actual share is likely higher, as we have to assume fossil sources when suppliers do not report their energy mix.
- Continuous investments in photovoltaics have been made. Since 2021, 17 solar plants have been operating at CRONIMET locations, with four added in the reporting year. The amount of self-produced power we consumed almost doubled to more than 1.4 GWh.



Particularly, the capacities created in South Africa are critical, as there is no possibility of purchasing non-fossil electricity from the grid.

#### — PREFERENCE FOR LOW-EMISSION ALTERNATIVES IN PURCHASING DECISIONS

- The use of HVO biodiesel instead of conventional, fossil diesel increased at some of our subsidiaries. This led to emission reductions of around 940 metric tons CO<sub>2</sub>e in 2024.

#### — DECARBONIZATION ALONG THE VALUE CHAIN

- We will seek additional ways of contributing to the overall decarbonization of our industry in close cooperation with our customers and other partners.
- We continue collaborating with machinery producers to ensure electric alternatives meet our needs. In the past, a battery excavator was developed in cooperation with a supplier in an innovation project sponsored by the German Federal Ministry of Economics and Climate Protection.

#### Actions planned for the future

**These are the further reductions required until our near-term target at the beginning of 2034**

**Scope 1 and 2:** -31.1% reduction

Fluctuations in tonnage resulted in fuel and power consumption deviating from past years at some of our subsidiaries. In particular, one of our processing facilities was less active in 2024. Excluding these temporary effects, the required reductions amount to about 48.8%.

**Scope 3:** -23.6%

**These are the actions planned for the following years:**

#### — STRATEGIC PRIORITIZATION

- Measures for decarbonizing our operations depend significantly on the availability and allocation of financial resources. The financing strategy is being developed.
- We will gradually start to link executive incentives to the progress in implementing our climate action plan starting in 2025.

#### — EFFICIENCY MEASURES

- We will continue to increase the number of subsidiaries systematically implementing the respective methods defined by ISO 50001 and ISO 14001 to reduce energy consumption across types of fuel and power.
- We will also continue to avoid and minimize environmental impacts in Scope 3, e.g., from waste production and business travel, as well as the consumption of water, primary metals, and

other goods and services we purchase.

#### — ELECTRIFICATION

- We will continue to exchange our fossil-fueled yard machinery with electric alternatives. This will reduce our consumption of diesel and LPG.
- We will continue to exchange our fossil-fueled cars with electric alternatives, where such options and the necessary public charging infrastructure are available. The same goes for trucks, where, thus far, the available infrastructure is not sufficient. These measures will decrease diesel and gasoline consumption.
- We will assess the possibilities of decarbonizing our processing facilities to reduce our consumption of natural gas.

#### — SWITCH TO NON-FOSSIL ELECTRICITY

- We will continue to change all electricity contracts to non-fossil sources where such options are available on the market. We will maximize our electricity production for South Africa, where no such contracts are available.
- We keep investing in the self-production of electricity to increase the share of renewable electricity with long-term, predictable costs

#### — PREFERENCE FOR LOW-EMISSION ALTERNATIVES IN PURCHASING DECISIONS

- For waste and business travel that cannot be avoided, we continue to switch to low-emission

alternatives to reduce our Scope 3 emissions.

- We're working to establish a company-wide standard for documenting logistics emissions. As information about emission intensity of transport becomes available and we have sufficient transparency and comparability, we plan to include it in the purchasing decisions.
- We will continue to request supplier-specific emission factors for the primary metals we purchase where such purchases cannot be avoided. We aim to increase the share of materials with supplier-specific emission factors and gain experience assessing their reliability and comparability. Where sufficient options are available, we will consider emission intensity in purchasing decisions to decrease emissions from purchased goods and services.
- We will establish a group-wide policy around the use of HVO diesel, a biofuel based on hydrated vegetable oil. We aim to use it to power machines for which no suitable electric alternatives are available. This policy will entail purchasing requirements to ensure the HVO diesel is more climate-friendly than fossil diesel. There are efforts underway in the EU to create a quality certificate to deal with the problem of misleadingly labeled HVO diesel made from palm oil on the market, which is not lower in emissions.

## — DECARBONIZATION ALONG THE VALUE CHAIN

- We will prepare for a growing demand from our costumers, which is expected to increase globally as a high scrap ratio is a major decarbonization lever for our customers. While this does not impact our own value chain emissions, it decarbonizes the steel sector overall.
- We will strengthen partnerships to identify and implement emission reduction opportunities across the value chain.

We have not identified specific groups harmed by material impacts, and no actions for remedy are applicable in this context. Depending on the activity, stakeholders impacted by these actions include purchasing managers, subsidiary operations managers, employees, and logistics departments.

## METRICS AND TARGETS

### TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

#### E1-4 MDR-T

As this report is our first one following ESRS, we report no changes in metrics,

methodologies, or other assumptions.

Internal experts developed our emission reduction targets using the cross-sector guidance and tools for near-term and net-zero targets provided by the SBTi. They align with the Paris Agreement pathway for limiting global warming to 1.5°C above pre-industrial levels. Targets were approved internally by the Management Board and externally by the SBTi. They apply to the entire CRONIMET group.

Our current and planned measures to reach the targets and progress thus far are described in **E1-3**. Progress is measured through annual GHG accounting.

#### Near-Term:

- CRONIMET Holding GmbH commits to reduce absolute scope 1 and 2 GHG emissions by 60% by 2034 from a 2021 base year.\*
- CRONIMET Holding GmbH commits to reduce absolute scope 3 GHG emissions by 35% by 2034 from a 2023 base year.

#### Net Zero:

- CRONIMET Holding GmbH commits to reaching net-zero greenhouse gas emissions across the value chain by 2050.
- CRONIMET Holding GmbH commits to reducing absolute scope 1 and 2 GHG emissions

by 90% by 2050 from a 2021 base year.

- CRONIMET Holding GmbH commits to reducing absolute scope 3 GHG emissions by 90% by 2050 from a 2023 base year.\*

The target boundary includes land-related emissions and removals from bioenergy feedstocks.

In setting our targets, we made assumptions about future developments and conditions regarding both technological progress and the development of energy prices. While some uncertainties around delays in technological progress were accounted for when defining our targets, others might threaten their achievement.

### Technology-related assumptions:

#### — ELECTRIFICATION

- Suitable electric options for yard machinery are available in all major categories and geographies.
- There will be suitable electric cars and trucks in most countries we operate in, as well as sufficient public charging infrastructure and/ or possibilities to set up on-site charging stations to manage them.
- Local authorities and, where applicable, landlords, permit us to implement the required infrastructure changes for yard machinery electrification on-site.

- There is sufficient power available from the grid at our subsidiaries' locations to switch to electricity as the primary power source.

### — PREFERENCE FOR LOW-EMISSION ALTERNATIVES IN PURCHASING DECISIONS

- Emission intensity in freight logistics decreases, particularly for road and sea logistics.
- The emission intensity of primary metals decreases, and purchasing them in the required specifications and volume is possible.
- Sufficient availability of certified HVO diesel to power machines for which there are no electric alternatives available, as well as, e.g., backup generators.

#### — SWITCH TO NON-FOSSIL ELECTRICITY

- Except for South Africa, we can buy non-fossil electricity in all countries where we operate subsidiaries.

### — DECARBONIZATION ALONG THE VALUE CHAIN

- Our customers manage to bring down their own emissions. This depends vastly on technological progress and the scrap ratio of metals.



## Energy price-related assumptions:

### — ELECTRIFICATIONS & SWITCH TO NON-FOSSIL ELECTRICITY

- We work under the assumption that electrification offers mid-term and long-term economic benefits. Operating with non-fossil electricity is becoming cheaper than operating with fossil fuels, which is vital to ensure competitiveness while we decarbonize. Besides technological progress, the development of energy costs depends on politics and legislation. Due to their strategic relevance for our business, the development of operational costs in the European Union (EU) and the United States (U.S.) is of particular importance for us. In the EU, the CO<sub>2</sub> pricing mechanism was designed to have a steering effect toward making electrified operations more economical, alongside other elements of the EU Green Deal. In the U.S., however, intentions to promote non-fossil energy over fossil fuels are not apparent as for the first half of 2025. Observations of these developments will affect our activities and decisions. Besides that, iterating and further refining our targets also includes feasibility checks by local management and operations managers.

## ENERGY CONSUMPTION AND MIX E1-5

	2024
(1) Fuel consumption from coal and coal products (MWh)	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	48,278
(3) Fuel consumption from natural gas (MWh)	23,773
(4) Fuel consumption from other fossil sources (MWh)	0
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	12,223 <sup>1</sup>
<b>(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)</b>	<b>84,274<sup>1</sup></b>
<b>Share of fossil sources in total energy consumption (%)</b>	<b>85.9%<sup>1</sup></b>
<b>(7) Consumption from nuclear sources (MWh)</b>	<b>739<sup>2</sup></b>
<b>Share of consumption from nuclear sources in total energy consumption (%)</b>	<b>0.5%<sup>2</sup></b>
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	3,468
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	8,521 <sup>2</sup>
(10) The consumption of self-generated non-fuel renewable energy (MWh)	1,459
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	13,448 <sup>2</sup>
<b>Share of renewable sources in total energy consumption (%)</b>	<b>13.6%<sup>2</sup></b>
<b>Total energy consumption (MWh) (calculated as the sum of lines 6, 7 and 11)</b>	<b>98,461</b>

<sup>1</sup>10,126 MWh from electricity contracts where utility provider does not report on energy mix. Therefore, an unknown part of this value is from renewable and nuclear sources. The number also includes the charging of electric cars at public charging stations in all applicable countries, except Germany. This is a conservative assumption as many charging stations likely operate with renewable electricity.

<sup>2</sup> Probably higher, as 47% of the total electricity consumption stems from contracts where providers do not report a breakdown of the electricity mix, yet likely aren't 100% fossil. Also, many public charging stations probably work with renewable and/or nuclear electricity.

CRONIMET has activities in high-impact climate sectors, according to EU regulations. These are the taxonomy-eligible activities defined on [page 41](#). They are covered under NACE Codes E38.3 (materials recovery) and C24.1 (manufacture of basic iron and steel and of ferroalloys). As the group-wide reporting system for revenues according to these economic activities is currently being established, information on energy intensity will be disclosed in future reports.

## GHG EMISSIONS DISAGGREGATED BY SCOPES 1 AND 2 AND SIGNIFICANT SCOPE 3 <sup>E1-6</sup>

	Retrospective				Milestones and target years	
	Base year <sup>1</sup>	2023	2024	% N / N-1	2034	Annual % target / Base year
<b>Scope 1 &amp; 2 GHG emissions</b>						
Total Gross market-based Scope 1 and 2 GHG emissions (tCO <sub>2</sub> e)	31,024	27,112	22,065	-18.6%	12,410	5%
<b>Scope 1 GHG emissions</b>						
Gross Scope 1 GHG emissions (tCO <sub>2</sub> e)	21,286	20,739	16,793	-19.0%		
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	0	0	0			
<b>Scope 2 GHG emissions</b>						
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> e)	7,582	7,972	7,119	-10.7%		
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> e)	9,738	6,374	5,272	-17.3%		
<b>Significant Scope 3 GHG emissions<sup>2</sup></b>						
Total Gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> e)	1,980,455	1,980,455	1,755,587	-11.4%	1,287,296	-3.5%
<b>Upstream</b>						
1 Purchased goods and services	274,424	274,424	259,463	-5.5%		
3 Fuel and energy-related activities (not included in Scope1 or Scope 2)	8,735	8,735	7,244	-17.1%		
4 Upstream transportation and distribution	123,163	123,163	142,364	+15.6% <sup>3,4</sup>		
5 Waste generated in operations	4,764	4,764	3,335	-30.0%		
6 Business travel	542	542	567	+4.6%		
7 Employee commuting	1,702	1,702	1,684	-1.1%		
<b>Downstream</b>						
9 Downstream transportation	9,970	9,970	9,988	+0,2% <sup>3,4</sup>		
10 Processing of sold products	1,557,155	1,557,155	1,330,941	-14,5% <sup>3</sup>		
<b>Total GHG emissions</b>						
Total GHG emissions (location-based) (tCO <sub>2</sub> e)	2,009,165	2,009,165	1,779,499	-11,4%	1,298,843	
Total GHG emissions (market-based) (tCO <sub>2</sub> e)	2,007,567	2,007,567	1,777,681	-11,5%	1,299,706	

<sup>1</sup> Base-year for Scope 1 and 2 is 2021. Base-year for Scope 3 is 2023.

<sup>2</sup> The following categories have been excluded in line with the SBTi requirements: all Purchased goods and services apart from primary metals, Capital goods, End-of-life treatment of sold products and Investments. The following categories have been excluded as they are not applicable for CRONIMET: Upstream leased assets, Downstream leased assets, Franchises, Use of sold goods.

<sup>3</sup> When interpreting the year-on-year change in the emissions in these categories, tonnages need to be considered as these emissions correlate very closely with tonnages purchased and sold.

<sup>4</sup> Tracking logistics emissions across 30 subsidiaries, all continents, and transportation via road rail and water is a complex task. We are working to standardize our database and optimize our methodology and use of tools. The numbers are based on conservative assumptions. Data quality is not yet sufficient to allow for year-on-year emissions comparisons.



### GHG EMISSIONS INTENSITY (TCO<sub>2</sub>E PER TON OF MATERIAL SOLD) <sup>E1-6</sup>

	2024
Scope 1 and 2* (market-based)	0.0121
Scope 1	0.0092
Scope 2 (market-based)	0.0029
Scope 3 Upstream	0,2276
Scope 3 Downstream	0,7359

### GHG INTENSITY PER NET REVENUE (TCO<sub>2</sub>E/ EURO) <sup>E1-6</sup>

	2024
Total Scope 1 & 2 GHG emissions (location-based) per net revenue	0.0000091
Total Scope 1 & 2 GHG emissions (market-based) per net revenue	0.0000084

### EMISSIONS: SOURCES OF ESTIMATION AND OUTCOME UNCERTAINTY <sup>(BP-2)</sup>

Category	Primary Activity Data Source	Emission Factors Used	Sources of Uncertainty
Purchased goods	Tonnage of primary metals purchased	When available, supplier-specific emission factor, otherwise Ecoinvent standard emission factors. Proxies if neither is available	Availability, comparability and credibility of supplier-specific data. Limited transparency regarding off-spec material
Fuel- and energy-related activities	Fuel and electricity consumption; distance traveled by company fleet	Standard emission factors	—
Upstream and downstream transportation	Tonnage of incoming and outgoing materials; distances based on supplier/customer & CRONIMET locations (via Bing Maps/SeaRates)	Standard emission factors per transport mode (truck >32 t, sprinter <3.5 t, container ship, bulk ship, train)	Use of assumptions when primary data is missing (mode, tonnage, route)
Waste	Tonnage and type of waste; treatment type	Standard emission factors	—
Business travel	Distances or expenditure related to travel by plane, train, or car	Standard emission factors	—
Employee commuting	Number of employees and their working days (excluding remote work)	Standard emission factors	—
Processing of sold goods	Tonnage delivered to each customer	When available, customer-specific emission factor, otherwise average from World Stainless Forum with a safety margin adder	Lack of customer-specific emission data, limited availability of material specific standard factors

### Data quality assurance

Using emission factors always brings about uncertainty. Using supplier- or customer-specific data holds a degree of uncertainty of completeness and comparability. Likewise, standard emission factors from established databases are uncertain because the values are averages and may not perfectly reflect reality for every supplier and region worldwide. To ensure that the standard emission factors we use are suitable, accurate, and up-to-date, we took advantage of the expertise of the IFEU (Institute for Energy and Environmental Research Heidelberg). They consulted us on all analysis methods and calculations and provided guidance on which values to use from publicly accepted databases. The sources we use include EcoInvent, IPCC, state authorities like the German Federal Ministry of the Environment, DEFRA or EPA, and AIB. We will continue to work to improve the accuracy of our activity data and emission factors.



## GHG REMOVALS AND MITIGATION PROJECTS FINANCED THROUGH CARBON CREDITS

**E1-7**

Currently, we don't develop or contribute to GHG removal or storage projects within our operations or value chain. Additionally, no climate change mitigation projects have been financed outside the value chain. If future measures to achieve the net-zero target beyond gross GHG emission reduction goals include the purchase of carbon credits, those will be from trustworthy and effective sources credits, which align with the SBTi standards.

We have not made any public claims of GHG neutrality involving carbon credits.

## EU TAXONOMY REGULATION

The EU taxonomy reporting obligation requires companies to disclose the proportion of their revenue, capital expenditure (CapEx), and operating expenditure (OpEx) linked to the economic activities that qualify as environmentally sustainable under Articles 3 and 9 of the Taxonomy Regulation. The framework aims to clarify how companies contribute to environmental goals by aligning their operations with sustainability criteria.

At CRONIMET, the implementation process for the taxonomy reporting is underway. A dedicated team from the Finance and Sustainability Management departments has been established to ensure compliance with these requirements. The first step involved screening all our economic activities to assess their eligibility under the taxonomy framework. Three key revenue-generating activities supporting climate change mitigation were identified as taxonomy-eligible.

### 5.9 Materials Recovery from non-hazardous waste:

- This category reflects our core business of metal recycling;

### 3.9 Manufacture of Basic Iron and Steel (including Ferroalloys):

- Classified as a transitional activity, this includes our processing operations for ferroalloys such as ferromolybdenum, ferrotungsten, and ferrotitanium across various regions;

### 3.4 Manufacture of Batteries and Accumulators (Battery Recycling):

- This is classified as an enabling activity and represents our planned expansion into battery recycling.

The next phase involves setting up the reporting system to quantify the relevant KPIs, with an initial focus on determining the revenue and CapEx share of CRONIMET's materials recovery business. A group-wide reporting system covering all economic activities is currently being introduced, with a full taxonomy-aligned reporting planned for the 2025 financial year.

In parallel, we will formalize additional assessments, including the substantial contribution criteria, Do No Significant Harm (DNSH) checks, and minimum safeguards, to ensure full taxonomy alignment.



# E5 CIRCULAR ECONOMY

## STRATEGY

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND INTERACTION WITH STRATEGY AND BUSINESS MODEL SBM-3

Sub-topic	Impact, Risk or Opportunity	Description	Value Chain	Time Horizon
Resources inflows, including resources use	Actual/Potential Positive Impact	<b>Our circular economy business model</b> Our primary business is dedicated to recycling stainless steel scrap, which is sustainable as it keeps valuable raw materials in the cycle. We thereby provide added value for the future and limiting the need for primary materials extraction and processing. Due to our expertise, the ratio of recycled material can be maximized although to date certain economic viability limits still exist. We remain committed to keeping circular economy practices as the core of our business model.	Upstream, own operation, and downstream	Short, medium and longterms
	Opportunity	<b>Secondary material as a macro trend</b> The circular economy is recognized as a long-term trend with a substantial environmental impact through resource efficiency and reduced mining needs. It is also perceived positively by society. Therefore, demand for stainless steel using secondary raw materials is an opportunity for our business model.	Downstream	Medium and longterms
	Risk	<b>Customer requirements</b> The increase in customers' requirements can demand additional resources to meet their evolving demands. Our high dependency on a small number of customers limits our ability to influence them, increasing the challenge of adaptation.	Downstream	Medium and longterms

# IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

## POLICIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

### E5-1 MDR-P

As global specialists in stainless steel scrap and ferroalloys, we focus on transitioning from virgin resources by returning metallic raw materials to the materials cycle. We achieve this through recycling and processing, contributing to raw material efficiency and security. Our business model also facilitates sustainable sourcing by promoting the reuse of secondary metallic materials.

Therefore, our primary objective is to maximize the amount of secondary metals being recycled, with risks and opportunities aligned accordingly. The impact of these activities is monitored through the tonnage of secondary materials prepared for recycling, which also reflects the amount of metals that can be recovered instead of mined as primary raw materials. This principle guides all business activities across the organization, and the Management Board, particularly the CEO, is

accountable for implementing this approach.

With the circular economy at the core of our business model and throughout upstream and downstream value chain, we do not require specific policies on the topic or reference specific third-party standards or initiatives.

Moreover, since metals are not renewable per definition, we are committed to reducing reliance on primary metals. Although small amounts of primary materials are still required to meet our customer specifications within stainless steel, we have leveraged our core competencies to incorporate non-standard primary materials, which other companies might reject.

## ACTIONS AND RESOURCES IN RELATION TO RESOURCE USE AND CIRCULAR ECONOMY

### E5-2 MDR-A

There have not been actions or allocated efforts to prevent or mitigate adverse impacts on resource use and the circular economy. This decision is because no material adverse effects have been identified about those practices within our business model.



# METRICS AND TARGETS

## TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

### E5-3 MDR-T

As the CRONIMET business model is centered around enabling recycling, our business targets regarding tonnages are directly linked to the circular economy principles, as mentioned in SBM-1. They are focused on the profitable maximization of absolute tonnage, ensuring that purchasing, analyzing, sorting, processing, and blending various secondary metallic materials contribute to an increased recycling efficiency. Overall, the achievement of our targets increases the circular material use rate by enabling secondary materials to be brought back into the material cycle and reducing the outflow of metals from the cycle, while some of our innovations also prevent loss of quality in existing cycles.

The progress toward our goals within the Circular Economy is measured through annual forecasting with monthly reviews, considering market conditions that may influence performance and science-based

considerations. Particularly for stainless steel recycling, they are supported by a 2020 study by the Fraunhofer Institute for Microstructure of Materials and Systems. According to it, steel scrap provides savings between 3.7 and 4.7 tons of carbon emissions per ton, depending on the alloying elements included. The study also highlights the economic benefits of the increased utilization of scrap and resource conservation potential.

In addition to scrap tonnage, there are targets to enable the recycling of metal products that previously could not be recycled or were only recoverable at lower quality. This objective is once again directly related to our business model, emphasizing innovation to open new business fields and enhance material recovery for recycling as an absolute target. The scope includes research and the development of new technologies and processes to push the limits of feasibility and viability in metal recovery, particularly for previously unrecyclable materials due to their specifications.

Our targets within the circular economy align with the “recycling layer” of the waste hierarchy, emphasizing our existing role in the material recovery of metallic materials. They also further reinforce our commitment to expanding recycling capabilities and driving

technological advancements in metal recovery. With a business model intensely focused on metal recycling, we do not have targets for sourcing and use of renewable resources or waste management. Likewise, we do not invest in increasing circular product design because we do not design products.

## RESOURCE INFLOWS E5-4

Material	Purchase by weight (tons)
2024	
Recycled metals	1,748,213
Primary metals	47,987
<b>TOTAL</b>	<b>1,796,200</b>
Percentage of recycled materials	97.3%

*Note: These figures give an overview of the metals we have sourced from our suppliers. The discrepancy between this figure and the data given on the amount of material sold reflects changes in inventory. The data provided is estimated and sourced from the goods in material controlling, which either directly accesses the central ERP system or receives reported figures from subsidiaries. Due to stock fluctuations, this data is considered an estimate. Methods used for this estimation include additional reports from subsidiaries, especially when the current controlling report lacked specific information.*





# SOCIAL

— OUR FOCUS IS  
TO PROVIDE A SAFE,  
ENGAGING AND  
MEANINGFUL WORK  
ENVIRONMENT. —

# S1 OWN WORKFORCE

## STRATEGY

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES **SBM-3**

Sub-topic	Impact, Risk or Opportunity	Description	Value Chain	Time Horizon
Working conditions: health and safety	Actual Negative Impact	<b>Risk of injury when working with scrap</b> The possibility of injury when working with scrap has a material impact on our workforce due to the hazards of handling materials, including puncture wounds, cuts, flying fragments, crushing injuries, and potentially unrecognized radioactivity from scrap.	Own operations (yards where material handling occurs)	Short, medium and long terms
	Risk	<b>Loss of know-how</b> The loss of know-how due to an aging workforce presents a challenge in securing the right talent for CRONIMET, which is a global issue, but particularly significant in certain regions, including our headquarters. The risk is driven by the shortage of skilled and unskilled workers, demographic changes, and increasing competition for talent. The risk is addressed in our recruitment and employee development processes.	Own operations (People & Organization)	Short, medium and long terms
	Risk	<b>Shortage of staff</b> We face a risk of staff shortages as demographic change currently is faster than automation in the industry. The risk is addressed in our recruitment and employee development process.	Own operations (People & Organization).	Short, medium and long terms

## INTERACTION WITH STRATEGY AND BUSINESS MODEL

### S1 SBM-3

Our disclosure scope includes all individuals within our workforce who could be materially impacted by our operations, business relationships, and the transition to a more sustainable economy.

The risk of injury is particularly significant for workers handling materials with specific physical and chemical characteristics. This impact is considered systemic within our operational environments. We implement occupational health and safety measures, such as ISO 45001 certifications and hazard risk assessments, to mitigate this risk. Operational workers face higher exposure to risks compared to office-based employees, and CRONIMET considers physical conditions, such as age and capability, when assigning tasks.

As for the positive impacts, our corporate values and leadership principles foster a safe, inclusive work environment that encourages professional development.

We face risks related to an aging workforce and increasing competition for talent. However, we have actively addressed these challenges

through succession planning, employer branding, and training programs for key positions. Additionally, while transitioning to more sustainable operations has not resulted in identifiable negative impacts on employees, it has created limited opportunities for new roles, such as sustainability engineers and battery recycling specialists.

There is no evidence of operations with risks of forced or child labor, nor have any geographic regions been identified as high-risk for such practices within our activities.

## IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

### POLICIES RELATED TO OWN WORKFORCE

#### S1-1 MDR-P

We continuously strengthen our policies and engagement strategies to ensure that human rights, diversity, inclusion, and workplace safety remain integral to our corporate culture. Through a structured governance, transparent reporting mechanisms, and continuous improvement initiatives, we uphold our commitment to a responsible and ethical work environment. Our

Management Board, particularly our CEO, is responsible for their implementation.



The **CRONIMET Corporate Values** are the foundation of our culture and define, characterize, and motivate us in equal measure. They give us a

clear orientation of what the holding management's expectation is regarding our behaviors. The document is published on the intranet and also on our company's website, and it is valid for all CRONIMET employees.



We have developed 12 **Leadership Principles** that describe how we want to deal with each other and with our employees. We aim to use leadership

principles to improve our day-to-day work and promote success. They apply to every occasion and everywhere in our company and—based on our values—emphasize our corporate culture. They are valid for all CRONIMET employees.



The **CRONIMET Code of Conduct** embodies the core values and principles by which we want to act as a company. Respectful, entrepreneurial, learning, cooperative, and responsible—these

corporate values form the foundation of our actions. The Code of Conduct serves as a guideline for us, and it is intended to help us always make the right decisions and to act responsibly. The document is published on the intranet and also on our company's website, and it is also valid for all CRONIMET employees.



The **Occupational Health and Safety Policy** aims to maintain and continuously improve occupational

health and safety in compliance with all relevant and current legal standards. It underlines our OHS culture and is related to the material impact of risk of injury when working with scrap. It applies to all subsidiaries, with a particular focus on the sites with ISO 45001 certification, and considers the interests of our employees. Information on the occupational health and safety policy and our occupational health and safety principles is available via the document management system, the intranet, and notice boards at the sites.



The **Policy Statement on Respect for Human Rights and the Environment** reflects CRONIMET's commitment to ethical business practices and continuous improvement in human rights,



environmental stewardship, and corresponding supply chain due diligence. The statement addresses practices related to our employees, our own group of companies, suppliers, and business partners, focusing on universal human rights and internationally recognized environmental rights. It is published on the intranet and also on our company's website. Moreover, the policy statement is shared personally with these parties, organizations, or people in high-risk supplier situations or cases of individual inquiries by business partners or external parties.

At CRONIMET, we respect all internationally recognized human and environmental rights and direct our business practices accordingly.

In particular, we are committed to complying with the following legal regulations, standards, conventions, guidelines and related organizations:

#### **The United Nations (UN):**

- Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of all Forms of Discrimination Against Women
- UN Sustainable Development Goals

#### **International Labour Organization (ILO):**

- Declaration on Fundamental Principles and Rights at Work
- Core Labour Standards

#### **Organization for Economic Cooperation and Development (OECD):**

- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

#### **Other environmental and climate protection conventions:**

- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal
- Paris Climate Agreement of 2015

Regarding human rights, our Code of Conduct mandates respect for all employees regardless of gender, ethnicity, age, religion, or sexual identity, emphasizing fair treatment and protection of personal dignity. The Policy Statement on Respect for Human Rights and the Environment

underscores our responsibility to uphold them across our business operations and supply chain, ensuring fair wages, equal treatment, and safe working conditions. In our analyses, decisions, and actions, we always include the perspectives of the rights holders, taking exceptional care to consider the justified interests and protection requirements of vulnerable persons and groups. In some countries in which CRONIMET operates, there are specific laws and orders that promote or even oblige companies to hire disabled or formally disadvantaged people. CRONIMET is supportive of those initiatives and legal requirements.

CRONIMET strictly rejects all forms of discrimination, forced labor, child labor, and modern slavery. We ensure that any human rights violations or workplace discrimination are promptly addressed through our whistleblower system, enabling employees to report violations confidentially (see more in [S1-3](#)). We are also committed to equal employment opportunities and have established a Mixed Leadership Team to track progress in gender equality and implement new measures.

Furthermore, we actively promote our employees' skills development and career advancement through structured training programs, annual feedback interviews, and learning opportunities such as e-learning modules on human rights and sustainability.

We ensure that recruitment and advancement decisions are based on qualifications, skills, experience, and commitment to CRONIMET values while considering the challenges faced by individuals from underrepresented groups. We support flexible learning options and mentorship programs to facilitate career progression.

#### **PROCESSES FOR ENGAGING WITH OWN WORKFORCE ABOUT IMPACTS [S1-2](#)**

CRONIMET actively engages with the workforce to ensure our employees' perspectives are incorporated into decision-making processes, particularly in managing actual and potential impacts. Regular surveys, feedback sessions, and direct communication channels allow employees to voice concerns and suggestions. Workers' representatives, where applicable, also play a key role in discussions, ensuring collective input is considered in strategic planning.

The engagement occurs through multiple channels, including the oneCRONIMET intranet, regular company meetings, annual employee feedback interviews, and ad hoc surveys on leadership, corporate culture, benefits, and targets. These platforms facilitate continuous dialogue and allow employees to interact directly with responsible decision-makers. The Chief Human Resources Officer (CHRO/CIO)

holds operational responsibility for ensuring engagement efforts are effective. That feedback is integrated into the company’s strategic approach. These activities also take place at both the group and local levels. On a group level, company-wide surveys and management meetings provide broad insights, while at the site or project level, targeted discussions and focus groups address specific operational concerns. Information from local engagement is centralized and shared with the senior management to ensure alignment with broader corporate strategies. Through companywide communications such as newsletters, intranet, and company meetings, our employees are kept informed about how their input influences decision-making. By maintaining transparency, we aim to foster a culture of participation and ensure employees see tangible results from their engagement.

Financial and human resources are allocated to sustaining engagement efforts, including investment in feedback systems, communication tools, and manager training programs. These resources enable us to maintain a structured and effective workforce engagement strategy.

To evaluate the effectiveness of engagement activities, we regularly assess participation rates and the quality of feedback collected through surveys, focus groups, and suggestion

programs. We systematically record employee feedback through digital surveys, direct meetings, and internal suggestion tools, analyzing trends and common themes to identify necessary improvements. This feedback informs policy adjustments, operational changes, and strategic initiatives.

Additionally, true to our commitment to sustainability, we engage with employees on topics related to carbon emissions reduction and the transition to greener operations. Regular meetings and workshops inform employees about the transition process.

### PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS TO RAISE CONCERNS

**S1-3**

We have a structured process to address and remediate any material negative impacts on our workforce, ensuring employees have adequate channels to raise concerns and seek resolution. The organization follows a comprehensive approach that begins with investigating reported concerns, gathering relevant information from affected employees, reviewing documentation, and consulting workers’ representatives where applicable. Once the impact is understood, a tailored remedy plan is developed, which may

include workplace adjustments, additional support services, or policy changes to prevent future occurrences. To evaluate effectiveness, follow-up procedures are in place to monitor outcomes and gather employee feedback to ensure the issue has been fully addressed.

There are multiple confidential and accessible channels for employees to raise concerns, ensuring that all workforce members can report issues safely and without fear of retaliation. These channels include a whistleblower system, the General Equal Treatment Act Trust Center in Germany, staff meetings, town hall meetings, and, where applicable, works councils. The whistleblower system offers an anonymous online reporting platform managed by the compliance team, allowing employees to submit concerns at any time. It operates 24/7, ensuring confidentiality and professional case management. Unionized employees can raise concerns through trade unions and works councils. At the same time, nonunionized workers can engage directly with managers and HR representatives.

Human rights and environmental risks and violations along the supply chains and within CRONIMET’s own business area can be addressed through other channels as well, e.g., by means of reporting them to the works council or other employee representatives,

to the management team, the Human Rights Committee ([humanrights@cronimet.de](mailto:humanrights@cronimet.de)), or the [whistleblower system](#). Open forums and direct engagement sessions with management further encourage a culture of transparency and proactive issue resolution. Regular meetings and structured feedback sessions allow employees to voice concerns in a supportive environment.

The purpose and accessibility of those channels are communicated through onboarding sessions, training programs, and internal communications. The intranet is a central hub where employees can access reporting mechanisms and relevant policies. Managers and People & Organization representatives are trained to handle sensitive concerns and escalate issues appropriately, ensuring employees feel comfortable using these channels.

We track and monitor the reported issues through a structured case management system, ensuring concerns are recorded, assessed, and resolved promptly. Stakeholders from our own workforce are involved in evaluating the effectiveness of reporting channels. Continuously refining these processes ensures that our response mechanisms remain effective and aligned with our employees' needs.

## ACTIONS ON MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES

### S1-4 MDR-A

#### Secure employment

A quarterly global HR forum enables information sharing about relevant HR topics with the whole group. It provides a platform for proactive identification of actual and potential impacts, risks, and opportunities. All HR professionals worldwide are engaged in this initiative, including managing directors, local HR teams, and the People & Organization department at the headquarters.

To foster a positive work environment, we promote initiatives beyond compliance requirements, including biannual summer sports events, World Cleanup Days, and team-building activities supported by dedicated budgets. These activities enhance employee engagement and contribute to a sense of community within the organization.

Furthermore, we have implemented global succession planning for critical positions, employer branding activities, and training programs for key departments, including traders, to address staffing risks. We also offer vocational training and study programs to develop future talent. While no significant negative workforce

impacts have been identified due to the transition to a greener, climate-neutral economy, we remain committed to monitoring potential challenges and taking proactive measures if necessary.

The People & Organization and Environment, Quality and Safety (EQS) departments, along with local HR representatives in each legal entity, are responsible for managing workforce-related impacts. Where needed, external consultants are engaged to provide specialized support. Overall, we work diligently to ensure that our business practices do not negatively impact the workforce.

#### Health and safety

Our structured approach to preventing and mitigating material negative impacts on our workforce strongly emphasizes occupational health and safety. We have secured ISO 45001 certification for many of our yards, and plan to obtain more certifications to ensure effective health and safety management at operational sites. Additionally, knowledge exchange on workplace accidents will be further enhanced through the introduction of ad hoc reporting and analysis, allowing subsidiaries to share lessons learned and implement risk mitigation measures. Those actions contribute to achieving our objectives by promoting a culture of safety, continuous learning, and knowledge-sharing.

The occupational health and safety measures are being implemented across our operational yards. The effectiveness of these actions is tracked through external ISO 45001 audits and ongoing OHS hazard analysis. In cases where employees have experienced negative impacts, remediation efforts are aligned with national laws and regulations. At the same time, CRONIMET's corporate values guide our approach to supporting affected employees. Those who face workplace injuries are provided with the necessary assistance, ensuring compliance with legal requirements and internal commitments to worker well-being. We recognize that employee health and safety contribute to business profitability, and thus, we prioritize compliance with all relevant legal standards.

## METRICS AND TARGETS

### TARGETS FOR OWN WORKFORCE

#### S1-5 MDR-T

The key targets related to our workforce focus on occupational health and safety (OHS) and a structured approach to employee well-being, retention, and development:

- Secure employment-related targets that apply across all CRONIMET operations, focusing on continuously improving our standards. We believe that by making incremental adjustments and enhancements, we can not only uphold but also elevate them. The actions address workforce management and employment stability, as workforce shortages or knowledge loss could negatively impact us. To mitigate these risks, we are investing in employer branding, recruitment, and training initiatives to attract and retain resilient and skilled professionals.
- ISO 45001 rollout strategy mandates that subsidiaries meeting predefined thresholds must implement an externally certified OHS management system in the medium term. This initiative ensures a globally consistent approach to workplace health and safety. It aligns with CRONIMET's broader commitment to maintaining high standards in employee protection. The ISO 45001 certification target is designed to institutionalize health and safety practices across all operations.

The workforce-related targets form one of our corporate strategic planning pillars, which is renewed every five years and covers other areas such as markets, finance, processes, and sustainability. These group-level goals inform the development of subsidiary-specific objectives, which Holding Management monitors and regularly evaluates. Expert consultation



and stakeholder engagement help validate the strategy process and target-setting approach.

Performance tracking occurs through internal meetings, one-on-one follow-ups with local managing directors, and the annual global management meeting. These efforts ensure that progress is systematically assessed and corrective actions are taken when necessary.

We conduct analyses, engage stakeholders, and implement corrective actions if deviations occur. We may also increase support, allocate additional resources, or adjust monitoring efforts to ensure target achievement. By continuously refining this approach, we enhance our ability to meet sustainability objectives while maintaining a strong, engaged workforce.

CHARACTERISTICS OF OUR EMPLOYEES

S1-6

Data about our employees is collected on a subsidiary level and reported to CRONIMET Holding, considering applicable national and international data protection laws. Further consolidation and analysis are performed within the Holding departments. The numbers reflect the headcount at the end of the reporting period. However, they are higher than the ones disclosed in the financial statement. This difference is because we included categories not considered in the financial statement, such as interns and apprentices.

HEADCOUNT BY GENDER, INCLUDING CONTRACT AND EMPLOYMENT TYPES

Contract Type	Men	Women	Total
Permanent	1,394	335	1,729
Temporary	66	28	94
Employment Type			
Full-time	1,418	282	1,700
Part-time	42	81	123

Notes:

1. No employee was reported as “other” or has not reported any gender.
2. Currently, one employee with non-guaranteed working hours has been reported. However, there is no groupwide common policy regarding this. Working hours and availability are decided jointly with the employee based on their availability and the company's needs. As the primary aim of this disclosure requirement is to give an understanding of job security, we included this category within temporary employees.

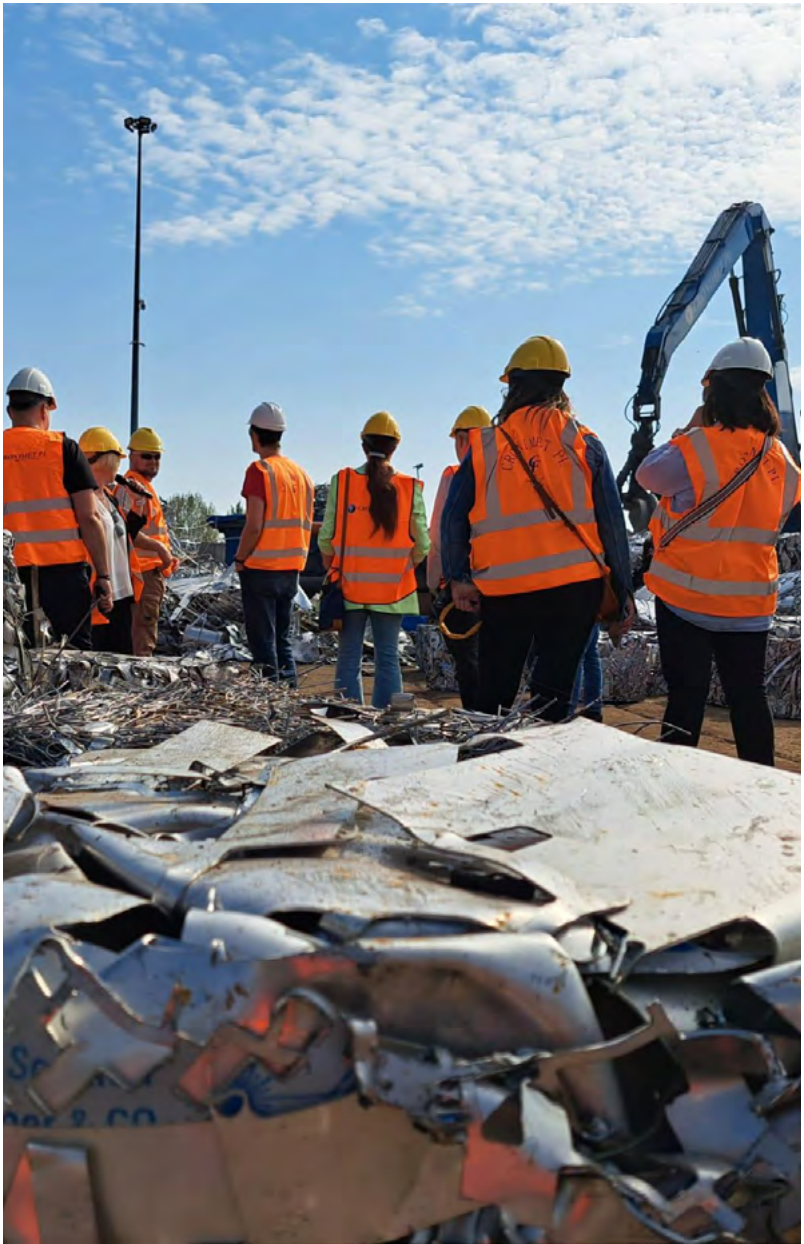
COUNTRIES WITH 50 OR MORE EMPLOYEES, REPRESENTING MORE THAN 10% OF THE TOTAL HEADCOUNT

Germany	511
United States	320
Armenia	232
Brazil	203

EMPLOYEE TURNOVER<sup>1</sup>

Employees who left the company <sup>2</sup>	424
Rate of employee turnover	23.26%

1. Rate of employee turnover in the reporting period: (number of employees who left the company / number of employees) \* 100 and represents the number of employees leaving as a share of the existing workforce.
2. Of these, 132 due to one-off restructuring activities at our subsidiary in Armenia.



CHARACTERISTICS OF NON-EMPLOYEES  
 IN OUR OWN WORKFORCE

S1-7

Not all the people performing work for CRONIMET are directly employed by us. At the end of 2024, we accounted for 60 non-employees. However, currently, we are unable to break down this total into the categories of “self-employed” and “people supplied by companies mainly focused on employment services”. The data is managed at the subsidiary level and reported to the Holding annually on a headcount basis.

We have not registered significant fluctuations in the number of non-employees during the reporting period or between the current and previous reporting periods.

HEALTH AND SAFETY METRICS<sup>1</sup>
S1-14

Percentage of people in CRONIMET's own workforce who are covered by its health and safety management system based on legal requirements and/or recognized standards or guidelines	35.16%
Number of fatalities as a result of work-related injuries	0
Number of fatalities as a result of work-related injuries of other workers on CRONIMET’s sites	0
Number of recordable work-related accidents <sup>2</sup>	49
Rate of recordable work-related accidents	17.97%
Number of days lost due to work-related injuries	731
Number of days lost due to fatalities from work-related accidents	0

Notes:

<sup>1</sup>Currently, we do not have a groupwide overview of our work-related ill health subject to legal restrictions on the collection of data. According to the ESRS, this information is subject to the phasing-in provision.

<sup>2</sup>The number of work-related accidents considers accidents in which the injured person is absent for at least one day. The rate is based on 1,000,000 hours worked. The data refers to CRONIMET employees, and it has been collected and managed at a subsidiary level and reported to the Holding for further analysis and consolidation.

INCIDENTS, COMPLAINTS, AND SEVERE  
 HUMAN RIGHTS IMPACTS

S1-17

During the reporting period, we documented two substantiated cases related to workforce concerns in our whistleblower system, which did not result in any fines. Additionally, 23 complaints were filed through various internal grievance mechanisms available to employees and are tracked in our whistleblower system, ensuring transparency and accountability in addressing workplace issues.

We reported zero cases of severe human rights violations, including forced labor, human trafficking, or child labor. Likewise, no noncompliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises was identified.

As no severe human rights incidents occurred, there were no cases where we played a role in securing remedies for affected individuals. Consequently, no fines, penalties, or compensation payments related to human rights incidents were recorded.



CRONIMET Management Board (from left to right) Leandro Campos, Jürgen Pilarsky, Marijo Zeljko, Bernhard Kunsmann, Annette Gartner

# GOVERNANCE

— AS PART OF OUR CONVICTION, WE ARE TAKING SIGNIFICANT STEPS TO STRENGTHEN OUR SUPPLY CHAIN GOVERNANCE. —



# G1 BUSINESS CONDUCT

## STRATEGY

### MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES AND INTERACTION WITH STRATEGY AND BUSINESS MODEL **SBM-3**

Sub-topic	Impact, Risk or Opportunity	Description	Value Chain	Time Horizon
Management of relationships with suppliers, including payment practices	Actual Positive Impact	<b>Payment terms of scrap</b> Our short-term payment practice benefits our suppliers of scrap materials, improving their financial stability and strengthening our business relationships. As we operate in a highly competitive environment, offering good payment conditions is essential to securing scrap materials.	Upstream (scrap supplier base)	Short, medium and long terms
	Opportunity	<b>Global network of traders</b> Our global network of traders fosters eye-to-eye collaboration and establishes personal contact with our suppliers. It allows us to purchase materials efficiently, ensuring a good understanding of supplier requirements and strengthening supply chain reliability. To further capitalize these effects, we have been closing geographical gaps to expand and reinforce our sourcing capabilities. This opportunity is closely linked to our business model. Hence, no adjustments are needed to the carrying amounts of assets and liabilities over the next annual reporting period.	Upstream and own operations (trading department)	Short, medium and long terms
	Opportunity	<b>Voluntary extended due diligence commitment for the supply chain</b> Although we are not yet affected by the EU Corporate Sustainability Due Diligence Directive, we are proactively and voluntarily aligning with those requirements to enhance compliance and transparency. The decision reflects the importance of embedding sustainability in our business model, while also reducing risks along the way. Moreover, this initiative can strengthen relationships with key customers, foster partnerships, and improve our market position.	Upstream and own operations (trading and governance departments)	Short and medium term

# IMPACT, RISK, AND OPPORTUNITY MANAGEMENT

## POLICIES RELATED TO THE MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

### G1-2 MDR-P

Our communications with our suppliers are based on open, result-oriented dialogue, and the relationship occurs at multiple levels, particularly with the largest or most strategic ones. Engagement includes direct communications, compliance discussions, and sustainability initiatives. We have a set of policies and commitments that guide us through this process:



**Our Corporate Values** reinforce our dedication to quality, reliability, and trust-based partnerships, with openness and tolerance for individual, social, and cultural differences. This is manifested through the development of solutions for current and future challenges together with our business partners, reacting quickly and in a goal-oriented manner. These commitments extend to negotiations and contractual terms, including payment policies.



**The CRONIMET Code of Conduct** directly expresses the CRONIMET values and a set of essential guidelines for

action in our transactions with customers, partners, governments, societies, and general cooperation. It outlines our commitments to ethical business practices, emphasizing honest business relationships, fair competition, and transparent dealings, implementing all the measures available to prevent and eradicate any form of corruption and bribery.



**Our Supplier Code of Conduct** details our expectations toward our suppliers and is integrated into our contractual structures.

It mandates that suppliers establish due diligence processes, disclose their sustainability practices upon request, and comply with audits if required. We expect our suppliers to uphold the human rights and environmental standards set out in this document, which are part of our contracts and influence contract award decisions. Suppliers are also expected to pass these requirements or equivalent standards on to their business partners and upstream suppliers to support compliance throughout global supply chains.



**The Policy Statement on Respect for Human Rights and the Environment** sets clear expectations for our business partners to uphold

international standards and regulatory frameworks. We jointly bear the corporate responsibility regarding these commitments along the shared supply and value chain. The policy also details our supply chain due diligence and supplier screening procedures.

These four policies, which relate to all three material IROs for this topic, apply to all CRONIMET subsidiaries and affect all employees and our upstream supply chain. Accountability for implementing these policies rests with the Management Board, especially the CEO. Through implementing these policies, CRONIMET commits to respecting several important international third-party standards and initiatives, as listed in [S1-1](#).

The objectives of the policies are driven by the interests of the key stakeholders, as defined in [SBM-2](#). Proxies of the key stakeholders are included in the approval process for new policies and their iterative development. All policies are available internally on the CRONIMET Intranet and externally on the website and may be directly shared with stakeholders.

In addition to the generally short payment terms for scrap, preventing late payments, including to SMEs, is grounded in our Code of Conduct and company values, emphasizing fair, transparent, and reliable business practices. We negotiate respectfully with all suppliers on terms and conditions, including payment terms. Once delivery is completed, CRONIMET ensures payments are made on time, supported by ERP systems that align approvals and payments with agreed due dates. These procedures apply equally to all suppliers, regardless of size.

Moreover, CRONIMET prioritizes local sourcing whenever feasible. Our scrap trading and processing business naturally procures materials locally to reduce transportation emissions and support regional economic development. Additionally, local service providers are preferred when possible. Nevertheless, we apply the same due diligence, risk management, and compliance processes for all business partners, including vulnerable suppliers. For business partners and issues with higher risk potential, we identify and assess priority human rights and environmental risks through specific risk analyses. Risks are ranked by severity, likelihood, and/or our ability to influence them, focusing on the most significant.

## ACTIONS ON MANAGING MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES

### G1-2 MDR-A

Overall, global trading departments monitor the risks of supply chain disruptions and discuss them in risk management workshops at the corporate level. Group-wide structures and processes for quality management, supply chain due diligence, compliance, and legal matters ensure that human rights and environmental risks are continuously assessed and addressed. When risks or potential violations are identified, specific analyses are conducted to minimize risks, address issues, and implement appropriate measures to achieve acceptable outcomes.

We ensure that personnel responsible for human and environmental rights, including due diligence obligations, are appropriately trained and qualified. This goal is achieved through regular dialogue and interaction between the Supply Chain Due Diligence Officer, global managing directors, and the Group's Management Board. Additional measures include internal guidelines, targeted training programs, periodic reporting, and workshops at global management meetings. These initiatives help maintain the necessary level of expertise within the organization and ensure that due diligence obligations are effectively fulfilled across the Group.

Before accepting new suppliers or signing contracts, we run business partner checks conducted by the Governance teams to identify human rights and environmental risks. We use an AI-powered risk-management tool that draws on global data to identify human rights and environmental risks across our supply chain. The software supports compliance with the German Supply Chain Act and the European Corporate Sustainability Due Diligence Directive by providing a detailed overview of our own operations, direct suppliers, and—when substantiated—indirect suppliers. All direct suppliers and our own business entities are entered into the system, which assesses abstract risks using recognized indices, databases, media reports, and sources recommended by competent authorities, such as the Federal Office for Economic Affairs and Export Control. Based on this, specific risk analyses are carried out for those business partners and issues with higher risk potential or violations through self-assessments, certifications, reports, and other relevant information, enabling tailored preventive and corrective actions.

If severe risks exist with respect to internationally recognized human and environmental rights, we expect our business partners to take preventive measures to

prevent rights violations from occurring. If risks or violations have already occurred, we expect effective mitigating and remedial action to be taken in an appropriate form. If there is a particularly serious violation that cannot be countered with appropriate measures, we reserve the right to suspend or—as a last resort—end the business relationship.

No negative actual material impacts have been identified within this topic and no significant CapEx or OpEx is foreseen. We do not yet have previous actions to report as this is our first ESRS report.

In 2024, we took a number of supplier-related actions in response to perceived opportunities:

- Increasing global trader network coverage in South America (excluding Brazil) and North Africa by installing dedicated traders, and in Central Europe by the acquisition of Metallplast, with the aim of securing material flow from these regions.
- Updating of Supplier Code of Conduct to extend voluntary due diligence obligations for the supply chain, in line with future requirements.
- Introduction of continuous supplier screening and risk analysis with AI-supported software, including adverse media screening, due to be

in complete operation in the first half of 2025. This is intended to improve knowledge and understanding of the supply chain, provide early detection of risks and potential/actual misconduct, enable preventive measures (e.g., training and awareness-building on human and environmental rights) and improve documentation for supply-chain due diligence.



# METRICS AND TARGETS

## TARGETS RELATED TO THE MANAGEMENT OF SUPPLIERS

### G1-2 MDR-T

Since 2023, we have implemented structural and procedural measures to enhance the supply chain due diligence, including appointing responsible personnel, deploying IT solutions, and company-wide training programs. These efforts relate to our target to align with the German Supply Chain Act and the European Corporate Sustainability Due Diligence Directive before we are legally obliged to do so, and in line with our own Code of Conduct, the Code of Conduct designed for our suppliers and our CRONIMET values.

Our global network of traders aims to build strong relationships with customers and suppliers through our global presence and market-oriented structures and to be the first point of contact. However, this target is not yet measurable, outcome-oriented, and time-bound. As explained in SBM-2, the targets are currently under review and will consider ESRS requirements in the future.

The other actions mentioned in **G1 MDR-A** support our target of achieving major alignment in 2025 and applying due diligence measures across the CRONIMET group. The 2023 baseline consists of only reactive supply chain due diligence. However, some areas already have proactive due diligence measures in place as part of conflict mineral due diligence (EU 2017/821). We aim for 100% implementation of the software tool by June 30, 2025. This AI-supported system will comprehensively monitor all relevant suppliers regarding human rights and environmental compliance—the tool facilitates risk assessments, enabling suppliers to complete detailed questionnaires and undergo specific risk analyses. Additionally, workflows and corrective action plans will be integrated into the system from the second half of 2025 onward.

In turn, payment targets are strictly followed using ERP systems, ensuring adherence to contractually agreed due dates, regardless of supplier size, including SMEs.

For 2025, we also aim to secure explicit confirmation of our Supplier Code of Conduct from some of our suppliers. This objective is challenging, as industry players often adhere to their own codes of conduct rather than signing those of business partners. However, achieving it would mark progress in strengthening responsible supply chain practices.







# APPENDIX

## — ESRS INDEX —

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E4 IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities	30	
E5	<b>Resource Use and Circular Economy</b>		
E5 IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	30	
E5-1	Policies related to resource use and circular economy	43	
E5-2	Actions and resources related to resource use and circular economy	43	
E5-3	Targets related to resource use and circular economy	44	
E5-4	Resource inflows	44	

ESRS	DISCLOSURE DESCRIPTION	PAGE	NOTES
<b>S1</b>	<b>Own Workforce</b>		
<b>S1 SBM-2</b>	Interests and views of Own Workforce	27	
<b>S1 SBM-3</b>	Material impacts, risks and opportunities and their interaction with strategy and business model	47	
<b>S1-1</b>	Policies related to own workforce	47	
<b>S1-2</b>	Processes for engaging with own workforce and workers’ representatives about impacts	48	
<b>S1-3</b>	Processes to remediate negative impacts and channels for own workforce to raise concerns	49	
<b>S1-4</b>	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	50	
<b>S1-5</b>	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	50	
<b>S1-6</b>	Characteristics of the undertaking’s employees	51	
<b>S1-7</b>	Characteristics of non-employees in the undertaking’s own workforce	52	
<b>S1-14</b>	Health and safety metrics	52	
<b>S1-17</b>	Incidents, complaints and severe human rights impacts	52	
<b>G1</b>	<b>Business Conduct</b>		
<b>G1 GOV-1</b>	The role of the administrative, supervisory and management bodies	23	
<b>G1-2</b>	Management of relationships with suppliers	55, 56, 57	
<b>G1-6</b>	Payment practices	-	CRONIMET has opted to omit the information prescribed by ESRS G1-6 in its first voluntary ESRS sustainability statement, since reporting structures are still being developed for this topic.

# LIST OF DATA POINTS THAT DERIVE FROM OTHER EU LEGISLATION IRO-2

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	DESCRIPTION	SFDR REFERENCE	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE	MATERIAL/ NOT MATERIAL	LOCATION
ESRS 2 GOV-1	Board's gender diversity paragraph 21 (d)	x		x		Material	21
ESRS 2 GOV-1	Percentage of board members who are independent paragraph 21 (e)			x		Material	21
ESRS 2 GOV-4	Statement on due diligence paragraph 30	x				Material	24
ESRS 2 SBM-1	Involvement in activities related to fossil fuel activities paragraph 40 (d) i	x	x	x		Not material	
ESRS 2 SBM-1	Involvement in activities related to chemical production paragraph 40 (d) ii	x		x		Not material	
ESRS 2 SBM-1	Involvement in activities related to controversial weapons paragraph 40 (d) iii	x		x		Not material	
ESRS 2 SBM-1	Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			x		Not material	
ESRS E1-1	Transition plan to reach climate neutrality by 2050 paragraph 14				x	Material	33
ESRS E1-1	Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		x	x		Not material	
ESRS E1-4	GHG emission reduction targets paragraph 34	x	x	x		Material	37
ESRS E1-5	Energy consumption from fossil sources disaggregated by sources paragraph 38	x				Material	38
ESRS E1-5	Energy consumption and mix paragraph 37	x				Material	38
ESRS E1-5	Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	x				Material	38
ESRS E1-6	Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	x	x	x		Material	39
ESRS E1-6	Gross GHG emissions intensity paragraphs 53 to 55	x	x	x		Material	40
ESRS E1-7	GHG removals and carbon credits paragraph 56				x	Material	41
ESRS E1-9	Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			x		Material	Not reported
ESRS E1-9	Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)		x			Material	Not reported
ESRS E1-9	Location of significant assets at material physical risk paragraph 66 (c)					Material	Not reported
ESRS E1-9	Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)		x			Material	Not reported
ESRS E1-9	Degree of exposure of the portfolio to climate-related opportunities paragraph 69			x		Material	Not reported



DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	DESCRIPTION	SFDR REFERENCE	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE	MATERIAL/ NOT MATERIAL	LOCATION
ESRS E2-4	Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil, paragraph 28	x				Not material	
ESRS E3-1	Water and marine resources paragraph 9	x				Not material	
ESRS E3-1	Dedicated policy paragraph 13	x				Not material	
ESRS E3-1	Sustainable oceans and seas paragraph 14	x				Not material	
ESRS E3-4	Total water recycled and reused paragraph 28 (c)	x				Not material	
ESRS E3-4	Total water consumption in m3 per net revenue on own operations paragraph 29	x				Not material	
ESRS 2 SBM-3 E4	paragraph 16 (a) i	x				Not material	
ESRS 2 SBM-3 E4	paragraph 16 (b)	x				Not material	
ESRS 2 SBM-3 E4	paragraph 16 (c)	x				Not material	
ESRS E4-2	Sustainable land/agriculture practices or policies paragraph 24 (b)	x				Not material	
ESRS E4-2	Sustainable oceans/seas practices or policies paragraph 24 (c)	x				Not material	
ESRS E4-2	Policies to address deforestation paragraph 24 (d)	x				Not material	
ESRS E5-5	Non-recycled waste paragraph 37 (d)	x				Not material	
ESRS E5-5	Hazardous waste and radioactive waste paragraph 39	x				Not material	
ESRS 2 SBM-3 S1	Risk of incidents of forced labour paragraph 14 (f)	x				Material	47, 48
ESRS 2 SBM-3 S1	Risk of incidents of child labour paragraph 14 (g)	x				Material	47, 48
ESRS S1-1	Human rights policy commitments paragraph 20	x				Material	47, 48
ESRS S1-1	Due diligence policies on ILO Conventions paragraph 21			x		Material	48
ESRS S1-1	Measures to prevent trafficking in human beings paragraph 22	x				Material	52
ESRS S1-1	Workplace accident prevention policy paragraph 23	x				Material	47
ESRS S1-3	Grievance mechanisms paragraph 32 (c)	x				Material	49
ESRS S1-14	Number of fatalities and accident rates paragraph 88 (b)(c)	x		x		Not material	
ESRS S1-14	Days lost to accidents/illness paragraph 88 (e)	x				Not material	
ESRS S1-16	Unadjusted gender pay gap paragraph 97 (a)	x		x		Not material	
ESRS S1-16	Excessive CEO pay ratio paragraph 97 (b)	x				Not material	
ESRS S1-17	Incidents of discrimination paragraph 103 (a)	x				Not material	
ESRS S1-17	Non-respect of UNGPs and OECD guidelines paragraph 104 (a)	x		x		Not material	

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	DESCRIPTION	SFDR REFERENCE	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE	MATERIAL/ NOT MATERIAL	LOCATION
ESRS 2 SBM-3 S2	Significant risk of child or forced labour in value chain paragraph 11 (b)	x				Not material	
ESRS S2-1	Human rights policy commitments paragraph 17	x				Not material	
ESRS S2-1	Policies related to value chain workers paragraph 18	x				Not material	
ESRS S2-1	Non-respect of UNGPs and OECD guidelines paragraph 19	x		x		Not material	
ESRS S2-1	Due diligence policies on ILO Conventions paragraph 19			x		Not material	
ESRS S2-4	Human rights issues and incidents in value chain paragraph 36	x				Not material	
ESRS S3-1	Human rights policy commitments paragraph 16	x				Not material	
ESRS S3-1	Non-respect of UNGPs, ILO, OECD guidelines paragraph 17	x		x		Not material	
ESRS S3-4	Human rights issues and incidents paragraph 36	x				Not material	
ESRS S4-1	Policies related to consumers and end-users paragraph 16	x				Not material	
ESRS S4-1	Non-respect of UNGPs and OECD guidelines paragraph 17	x		x		Not material	
ESRS S4-4	Human rights issues and incidents paragraph 35	x				Not material	
ESRS G1-1	UN Convention against Corruption paragraph 10 (b)	x				Not material	
ESRS G1-1	Protection of whistle-blowers paragraph 10 (d)	x				Not material	
ESRS G1-4	Fines for violation of anti-corruption laws paragraph 24 (a)	x		x		Not material	
ESRS G1-4	Anti-corruption and anti-bribery standards paragraph 24 (b)	x				Not material	

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**WE ARE WORKING ON A RECYCLING  
ECONOMY THAT CONNECTS RAW MATERIAL  
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