

CRONIMET Holding GmbH, Karlsruhe

Vermerk des unabhängigen Wirtschaftsprüfers über
eine betriebswirtschaftliche Prüfung zur Erlangung
begrenzter Sicherheit über den Sustainability Report
2021 zum 31. Dezember 2021

Anlagenverzeichnis

- | | |
|----------|---|
| Anlage 1 | Englische Übersetzung des Vermerkes des unabhängigen Wirtschaftsprüfers über eine betriebswirtschaftliche Prüfung zur Erlangung begrenzter Sicherheit über den Sustainability Report 2021 zum 31. Dezember 2021 – rechtlich nicht bindend |
| Anlage 2 | Sustainability Report 2021 |
| Anlage 3 | Allgemeine Auftragsbedingungen für Wirtschaftsprüfer und Wirtschaftsprüfungsgesellschaften in der Fassung vom 1. Januar 2017
- deutsch/englisch |

Vermerk des unabhängigen Wirtschaftsprüfers über eine betriebswirtschaftliche Prüfung zur Erlangung begrenzter Sicherheit über den Sustainability Report 2021 zum 31. Dezember 2021

An die CRONIMET Holding GmbH, Karlsruhe

Wir haben den für Ihren Konzern (basierend auf dem Konsolidierungskreis des nach HGB-Grundsätzen aufgestellten Konzernabschlusses zum 31. Dezember 2021) freiwillig in englischer Sprache verfassten Sustainability Report 2021 (nachfolgend „Nachhaltigkeitsbericht“) der CRONIMET Holding GmbH (nachfolgend „Gesellschaft“) für den Zeitraum vom 01.01.2021 bis 31.12.2021 einer betriebswirtschaftlichen Prüfung zur Erlangung begrenzter Sicherheit unterzogen. Nicht Gegenstand unserer Prüfung sind die in dem Nachhaltigkeitsbericht genannten externen Dokumentationsquellen oder Expertenmeinungen.

Verantwortung der gesetzlichen Vertreter

Die gesetzlichen Vertreter der Gesellschaft sind verantwortlich für die Aufstellung des Nachhaltigkeitsberichtes in Übereinstimmung mit den in den Sustainability Reporting Standards der Global Reporting Initiative (GRI Standards 2021, with reference to) genannten relevanten Grundsätzen.

Diese Verantwortung der gesetzlichen Vertreter der Gesellschaft umfasst die Auswahl und Anwendung angemessener Methoden zur Nachhaltigkeitsberichterstattung sowie das Treffen von Annahmen und die Vornahme von Schätzungen zu einzelnen nichtfinanziellen Angaben des Konzerns, die unter den gegebenen Umständen angemessen sind. Ferner sind die gesetzlichen Vertreter verantwortlich für die internen Kontrollen, die sie als notwendig erachtet haben, um die Aufstellung des Nachhaltigkeitsberichtes zu ermöglichen, die frei von wesentlichen falschen Darstellungen aufgrund von dolosen Handlungen (Manipulation des Nachhaltigkeitsberichtes) oder Irrtümern ist.

Die gesetzlichen Vertreter sind verantwortlich für die Überwachung des Prozesses der Aufstellung des Nachhaltigkeitsberichtes

Unabhängigkeit und die Qualitätssicherung der Wirtschaftsprüfungsgesellschaft

Wir haben die deutschen berufsrechtlichen Vorschriften zur Unabhängigkeit sowie weitere berufliche Verhaltensanforderungen eingehalten.

Danach wenden wir als Wirtschaftsprüfungsgesellschaft die Anforderungen des IDW Qualitätsmanagementstandards: Anforderungen an das Qualitätsmanagement in der Wirtschaftsprüferpraxis (IDW QMS 1 (9.2022)) an. Die Berufspflichten gemäß der Wirtschaftsprüferordnung und der Berufssatzung für Wirtschaftsprüfer/vereidigte Buchprüfer einschließlich der Anforderungen an die Unabhängigkeit haben wir eingehalten.

Verantwortung des Wirtschaftsprüfers

Unsere Aufgabe ist es, auf Grundlage der von uns durchgeführten Prüfung ein Prüfungsurteil mit begrenzter Sicherheit über den Nachhaltigkeitsbericht abzugeben.

Wir haben unsere betriebswirtschaftliche Prüfung unter Beachtung des International Standard on Assurance Engagements (ISAE) 3000 (Revised): „Assurance Engagements other than Audits or Reviews of Historical Financial Information“, herausgegeben vom IAASB, durchgeführt.

Danach haben wir die Prüfung so zu planen und durchzuführen, dass wir mit begrenzter Sicherheit beurteilen können, ob uns Sachverhalte bekannt geworden sind, die uns zu der Auffassung gelangen lassen, dass der Nachhaltigkeitsbericht der Gesellschaft, mit Ausnahme der in dem Nachhaltigkeitsbericht genannten externen Dokumentationsquellen oder Expertenmeinungen, in allen wesentlichen Belangen nicht in Übereinstimmung mit den in den Sustainability Reporting Standards der Global Reporting Initiative (GRI Standards 2021, with reference to) genannten relevanten Grundsätzen aufgestellt worden ist.

Bei einer betriebswirtschaftlichen Prüfung zur Erlangung einer begrenzten Sicherheit sind die durchgeführten Prüfungshandlungen im Vergleich zu einer betriebswirtschaftlichen Prüfung zur Erlangung einer hinreichenden Sicherheit weniger umfangreich, sodass dementsprechend eine erheblich geringere Prüfungssicherheit erlangt wird. Die Auswahl der Prüfungshandlungen liegt im pflichtgemäßen Ermessen des Wirtschaftsprüfers.

Im Rahmen unserer Prüfung haben wir u.a. folgende Prüfungshandlungen und sonstige Tätigkeiten durchgeführt:

- Verschaffung eines Verständnisses über die Struktur der Nachhaltigkeitsorganisation des Konzerns
- Befragung ausgewählter Mitarbeiter, die in die Datenerhebung und Aufstellung des Nachhaltigkeitsberichtes einbezogen wurden, über den Aufstellungsprozess sowie über Angaben in dem Nachhaltigkeitsbericht
- Einschätzung der Prozesse für die Ermittlung, Verarbeitung und Überwachung der Angaben, einschließlich der Konsolidierung der Daten
- Identifikation wahrscheinlicher Risiken wesentlicher falscher Angaben des Nachhaltigkeitsberichtes
- Analytische Beurteilung von ausgewählten Angaben des Nachhaltigkeitsberichtes

- Einsichtnahme und Prüfung ausgewählter Dokumente (Prüfungsnachweise), die die Angaben in dem Nachhaltigkeitsbericht belegen
- Abgleich von ausgewählten Angaben mit den entsprechenden Daten im Konzernabschluss und Konzernlagebericht
- Beurteilung der Darstellung von Angaben in dem Nachhaltigkeitsbericht

Prüfungsurteil

Auf der Grundlage der durchgeführten Prüfungshandlungen und der erlangten Prüfungsnachweise sind uns keine Sachverhalte bekannt geworden, die uns zu der Auffassung gelangen lassen, dass der Nachhaltigkeitsbericht der Gesellschaft für den Zeitraum vom 01.01.2021 bis 31.12.2021 in allen wesentlichen Belangen nicht in Übereinstimmung mit den in den Sustainability Reporting Standards der Global Reporting Initiative (GRI Standards 2021, with reference to) genannten relevanten Grundsätzen aufgestellt worden ist.

Wir geben kein Prüfungsurteil zu den in dem Nachhaltigkeitsbericht genannten externen Dokumentationsquellen oder Expertenmeinungen ab.

Verwendungsbeschränkung und Haftungsbegrenzung

Wir weisen darauf hin, dass die Prüfung für Zwecke der Gesellschaft durchgeführt und der Vermerk nur zur Information der Gesellschaft über das Ergebnis der Prüfung bestimmt ist. Folglich ist er möglicherweise für einen anderen als den vorgenannten Zweck nicht geeignet. Somit ist der Vermerk nicht dazu bestimmt, dass Dritte hierauf gestützt (Vermögens-)Entscheidungen treffen. Unsere Verantwortung besteht allein der Gesellschaft gegenüber.


Wir erteilen diesen Vermerk auf Grundlage des mit der Gesellschaft geschlossenen Auftrags, dem, auch mit Wirkung gegenüber Dritten, die allgemeinen Auftragsbedingungen für Wirtschaftsprüfer und Wirtschaftsprüfungsgesellschaften vom 1. Januar 2017 zugrunde liegen.

Unsere Haftung begrenzt sich gemäß Ziffer 9 Abs. 2 dieser Allgemeinen Auftragsbedingungen für einen fahrlässig verursachten einzelnen Schadensfall, mit Ausnahme der Schäden aus der Verletzung von Leben, Körper und Gesundheit, sowie von Schäden, die eine Ersatzpflicht des Herstellers nach § 1 ProdHaftG begründen, auf EUR 4 Mio. Diese Haftungsbegrenzung gilt gegenüber allen Adressaten bzw. Dritten (nachfolgend insgesamt „Empfänger“), die unseren Prüfungsvermerk bestimmungsgemäß erhalten. Diese Empfänger sind Gesamtgläubiger i.S.d. § 428 BGB und die Haftungshöchstsumme je Schadensfall von EUR 4 Mio. steht allen Empfängern zusammen insgesamt nur einmal zur Verfügung.

Gegenüber übrigen Dritten übernehmen wir keine Haftung, Verantwortung oder anderweitige Pflichten.

Düsseldorf, den 2. Juni 2023

Grant Thornton AG
Wirtschaftsprüfungsgesellschaft



Maximilian Meyer zu Schwabedissen
Wirtschaftsprüfer



Dr. Claudia Schrimpf-Dörjes
Wirtschaftsprüferin

Anlage 1

CRONIMET Holding GmbH, Karlsruhe

Independent assurance practitioner's report on a limited assurance engagement on the Sustainability Report 2021 for the Financial Year ended 31 December 2021

Note:

This document is a convenience translation of the German original.
The original German language document is the authoritative version.

Independent assurance partitioner's report on a limited assurance engagement on the Sustainability Report 2021 for the Financial Year ended 31 December 2021

To CRONIMET Holding GmbH, Karlsruhe

We have performed a limited assurance engagement for your group (based on the scope of the consolidated financial statement as of December 31, 2021, prepared in accordance with HGB ["Handelsgesetzbuch": German Commercial Code]) on the Sustainability Report 2021 (the "sustainability report") of CRONIMET Holding GmbH, Karlsruhe (the "parent company"), for the period from 1 January 2021 to 31 December 2021, which was voluntarily prepared in English.

The external sources of documentation or expert opinions mentioned in the sustainability report are not subject to our assurance engagement.

Responsibility of the Executive Directors

The executive directors of the parent company are responsible for the preparation of the sustainability report in accordance with the principles stated in the Sustainability Reporting Standards of the Global Reporting Initiative (GRI Standards 2021, with reference to).

This responsibility of the executive directors includes the selection and application of appropriate non-financial reporting methods and making assumptions and estimates about individual non-financial disclosures of the group that are reasonable in the circumstances. Furthermore, the executive directors are responsible for such internal control as the executive directors consider necessary to enable the preparation of a sustainability report that is free from material misstatement, whether due to fraud or error.

The executive directors of the parent company are responsible for monitoring the process of preparing the sustainability report.

Independence and Quality Assurance of the Assurance Practitioner's Firm

We have complied with the German professional requirements on independence as well as other professional conduct requirements.

Our audit firm applies the national legal requirements and professional pronouncements - in particular the By-laws Regulating the Rights and Duties of Wirtschaftsprüfer and vereidigte Buchprüfer in the exercise of their Profession and the IDW *Quality Assurance Standard* issued by the Institute of Public Auditors in Germany (IDW): *Requirements for Quality Management in the Audit Firm (IDW QMS 1 (9.2022))* and accordingly maintains a comprehensive quality management system that includes documented policies and procedures with regard to

compliance with professional ethical requirements, professional standards as well as relevant statutory and other legal requirements.

Responsibility of the Assurance Practitioner

Our responsibility is to express a conclusion with limited assurance on the sustainability report based on our assurance engagement.

We conducted our assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised): "Assurance Engagements other than Audits or Reviews of Historical Financial Information" issued by the IAASB.

This standard requires that we plan and perform the assurance engagement to obtain limited assurance about whether any matters have come to our attention that cause us to believe that the group's sustainability report, other than the external sources of documentation or expert opinions mentioned in the sustainability report, are not prepared, in all material respects, in accordance with the principles stated in the Sustainability Reporting Standards of the Global Reporting Initiative (GRI Standards 2021, with reference to).

In a limited assurance engagement, the procedures performed are less extensive than in a reasonable assurance engagement, and accordingly, a substantially lower level of assurance is obtained. The selection of the assurance procedures is subject to the professional judgment of the assurance practitioner.

In the course of our assurance engagement we have, among other things, performed the following assurance procedures and other activities:

- Gain an understanding of the structure of the group's sustainability organisation
- Inquiries of relevant employees involved in the preparation of the sustainability report about the preparation process, and about disclosures in the sustainability report
- Assessment of the processes for identifying, processing and monitoring the information, including the consolidation of data
- Identification of likely risks of material misstatement in the sustainability report
- Analytical procedures on selected disclosures in the sustainability report
- Inspection and examination of selected documents (audit evidence) supporting the disclosures in the sustainability report
- Reconciliation of selected disclosures with the corresponding data in the consolidated financial statements and group management report
- Evaluation of the presentation of the sustainability report

Assurance Opinion

Based on the assurance procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the sustainability

report of the group for the period from 1 January 2021 to 31 December 2021 is not prepared, in all material respects, in accordance with the principles stated in the Sustainability Reporting Standards of the Global Reporting Initiative (GRI Standards 2021, with reference to).

We do not express an assurance opinion on the external sources of documentation or expert opinions mentioned in the sustainability report.

Restriction of Use / General Engagement Terms / Liability / Exclusion of Liability in Relation to Third Parties

We draw attention to the fact that the assurance engagement was conducted for the parent company's purposes and that the report is intended solely to inform the parent company about the result of the assurance engagement. Consequently, it may not be suitable for any other purpose than the aforementioned. Accordingly, the report is not intended to be used by third parties for making (financial) decisions based on it. Our responsibility is to the parent company alone.

We issue this report based on the engagement concluded with the parent company, which, also with effect towards third parties, is based on the General Engagement Terms for Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften [German Public Auditors and Public Audit Firms] as of 1 January 2017.

In accordance with section 9 para. 2 of these General Engagement Terms, our liability for an individual case of damages caused by negligence, with the exception of damages resulting from injury to life, body or health, as well as for damages that constitute a duty of replacement by a producer pursuant to § 1 ProdHaftG [“Produkthaftungsgesetz”: German Product Liability Act] is limited to EUR 4 million. The limitation of liability applies to all addressees or third parties (the “recipients”) who receive our report as intended. These recipients are joint creditors in the sense of § 428 BGB [“Bürgerliches Gesetzbuch”: German Civil Code] and the maximum liability amount of EUR 4 million per claim is only available once to all recipients together.

We do not assume any liability, responsibility or other obligations towards other third parties.

Düsseldorf, 2 June 2023

Grant Thornton AG
Wirtschaftsprüfungsgesellschaft

Maximilian Meyer zu Schwabedissen
Wirtschaftsprüfer
[German Public Auditor]

Dr. Claudia Schrimpf-Dörjes
Wirtschaftsprüferin
[German Public Auditor]

Anlage 2

First
Sustainability Report

CRONIMET Holding GmbH

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The Sustainability Report 2021 of CRONIMET Holding GmbH
has been prepared in accordance with the
GRI Standards: Reference.

Contents

GRI 102: General Disclosures 2016	2
1. Organizational Profile.....	2
Disclosure 102-1: Name of the organization	2
Disclosure 102-2: Activities, brands, products, and services.....	2
Disclosure 102-3: Location of headquarters.....	4
Disclosure 102-4: Location of operations	4
Disclosure 102-5: Ownership and legal form	5
Disclosure 102-6: Markets served	5
Disclosure 102-7: Scale of the organization	6
Disclosure 102-8: Information on employees and other workers.....	8
Disclosure 102-9: Supply Chain	9
Disclosure 102-10: Significant changes to the organization and its supply chain	11
Disclosure 102-11: Precautionary Principle or approach	12
Disclosure 102-12: External initiatives	12
Disclosure 102-13: Membership of associations.....	12
2. Strategy	13
Disclosure 102-14: Statement from senior decision-maker	13
3. Ethics and Integrity.....	14
Disclosure 102-16: Values, principles, standards, and norms of behavior.....	14
4. Governance	16
Disclosure 102-18: Governance structure	16
5. Stakeholder Engagement	17

Disclosure 102-40: List of stakeholder groups.....	17
Disclosure 102-41: Collective bargaining agreements	17
Disclosure 102-42: Identifying and selecting stakeholders	17
Disclosure 102-43: Approach to stakeholder engagement	18
Disclosure 102-44: Key topics and concerns raised.....	18
6. Reporting Practice	19
Disclosure 102-45: Entities included in the consolidated financial statements.....	19
Disclosure 102-46: Defining report content and topic boundaries	20
Disclosure 102-47: List of material topics.....	22
Disclosure 102-48: Restatements of information.....	22
Disclosure 102-49: Changes in reporting.....	22
Disclosure 102-50: Reporting period	22
Disclosure 102-51: Date of most recent report.....	23
Disclosure 102-52: Reporting cycle	23
Disclosure 102-53: Contact point for questions regarding the report	23
Disclosure 102-54: Claims of reporting in accordance with the GRI Standards	23
Disclosure 102-55: GRI content index	24
Disclosure 102-56: External assurance	28
A. Environment	30
1. Climate Change	30
GRI 103: Management Approach 2016	30
GRI 201: Economic Performance 2016	31
Disclosure 201-2: Financial implications and other risks and opportunities due to climate change	31
GRI 302: Energy 2016	32

Disclosure 302-1: Energy consumption within the organization	32
Disclosure 302-5: Reductions in energy requirements of products and services	37
GRI 305: Emissions 2016.....	38
Disclosure 305-1: Direct (Scope 1) GHG emissions	38
Disclosure 305-2: Energy indirect (Scope 2) GHG emissions	41
2. Waste Management.....	44
GRI 103: Management Approach 2016	44
GRI 306: Waste 2020	45
Disclosure 306-1: Waste generation and significant waste-related impacts.....	45
Disclosure 306-2: Management of significant waste-related impacts.....	45
Disclosure 306-3: Waste generated	47
Disclosure 306-4: Waste diverted from disposal	48
Disclosure 306-5: Waste directed to disposal	51
3. Sustainability of Trading Goods and Services.....	54
GRI 103: Management Approach 2016	54
GRI 301: Materials 2016	55
Disclosure 301-1: Materials used by weight or volume	55
Disclosure 301-2: Recycled input materials used.....	55
Disclosure 301-3: Reclaimed products and their packaging materials	56
B. Social.....	58
1. Recruitment and Retention (including Work-Life Balance)	58
GRI 103: Management Approach 2016	58
GRI 401: Employment 2016.....	59
Disclosure 401-1: New employee hires and employee turnover	59

Disclosure 401-2: Benefits provided to full-time employees that are not provided to temporary or part-time employees	61
Disclosure 401-3: Parental leave	63
2. Occupational Health and Safety	65
GRI 103: Management Approach 2016	65
GRI 403: Occupational Health and Safety 2018.....	67
Disclosure 403-1: Occupational health and safety management system	67
Disclosure 403-2: Hazard identification, risk assessment and incident investigation	68
Disclosure 403-3: Occupational health services.....	71
Disclosure 403-4: Worker participation, consultation and communication on occupational health and safety	72
Disclosure 403-5: Worker training on occupational health and safety.....	72
Disclosure 403-6: Promotion of worker health	74
Disclosure 403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships.....	74
Disclosure 403-8: Workers covered by an occupational health and safety management system	75
Disclosure 403-9: Work-related injuries.....	76
3. Training and Development.....	79
GRI 103: Management Approach 2016	79
GRI 102: Ethics and Integrity 2016	80
Disclosure 102-16: Values, principles, standards, and norms of behavior	80
Disclosure 102-17: Mechanisms for advice and concerns about ethics	80
GRI 404: Training and Education 2016	81
Disclosure 404-1: Average hours of training per year per employee	81

Disclosure 404-2: Programs for upgrading employee skills and transition assistance programs	82
Disclosure 404-3: Percentage of employees receiving regular performance and career development review	83
4. Diversity and Equal Opportunities	84
GRI 103: Management Approach 2016	84
GRI 405: Diversity and Equal Opportunity 2016.....	85
Disclosure 405-1: Diversity of governance bodies and employees.....	85
Disclosure 405-2: Ratio of basic salary and remuneration of women to men.....	90
Philanthropic Activities / Contributions.....	91
GRI 103: Management Approach 2016	91
GRI 201: Economic Performance 2016	92
Disclosure 201-1: Direct economic value generated and distributed.....	92
5. Responsibility in the Supply Chain	94
GRI 103: Management Approach 2016	94
GRI 102: General Disclosures 2016.....	95
Disclosure 102-10: Significant changes to the organization and its supply chain.....	95
GRI 308: Supplier Environmental Assessment 2016.....	95
Disclosure 308-1: New suppliers that were screened using environmental criteria	95
Disclosure 308-2: Negative environmental impacts in the supply chain and actions taken....	96
C. Governance.....	102
GRI 103: Management Approach 2016	102
1. Compliance and Good Corporate Governance	105
GRI 102: General Disclosures 2016.....	105
Disclosure 102-56: External assurance.....	105

GRI 307: Environmental Compliance 2016	105
Disclosure 307-1: Non-compliance with environmental laws and regulations	105
GRI 419: Socioeconomic Compliance 2016	106
Disclosure 419-1: Non-compliance with laws and regulations in the social and economic area	106
2. Risk management and Anti-corruption	107
GRI 205: Anti-corruption 2016.....	107
Disclosure 205-1: Operations assessed for risks related to corruption	107
Disclosure 205-2: Communications and training about anti-corruption policies and procedures	108
Disclosure 205-3: Confirmed incidents of corruption and actions taken	110

GRI 102

General Disclosures

GRI 102: General Disclosures 2016

1. Organizational Profile

Disclosure 102-1: Name of the organization

CRONIMET Holding GmbH

Disclosure 102-2: Activities, brands, products, and services

Activities, product groups and services

We ensure that metal raw materials are preserved through recycling and returned to the cycle. Demand for stainless steel is undiminished: After all, this material is used in a wide range of consumer goods, vehicles, infrastructure and industrial plant and machinery. The raw materials needed to produce stainless steel in its various alloys are in short supply, and the costs of mining are high for both people and the environment. This applies to chromium, nickel, molybdenum and titanium, among others. It is therefore all the more important to close the material cycle by recycling. To serve the raw material requirements of the economy in a sustainable way, we rely on our global network and our expertise in analyzing, purchasing and processing of secondary metallic raw materials. At the same time we are working on increasing the proportion of recyclable metals: Innovative business models such as the processing of industrial sludges and electric car batteries are examples of this.

Our wide portfolio ranges from stainless steel and metal scrap to special alloys and superalloys. The material blends specially put together according to customer requirements are melted directly by manufacturing companies. Analyses and modern technologies play a major role when it comes to preparing materials for direct use in steel mills, foundries and vacuum smelters. We rely on well-defined, tried-and-tested processes as well as effective and customized IT solutions. Our trained, experienced specialists use a mobile X-ray fluorescence spectrometer as early as the incoming goods stage. This enables them to determine the chemical composition of the material and identify alloys. The results are transferred directly to the SAP system using an app specially developed by CRONIMET. For a more precise information base, the material is analyzed again in our laboratories, if necessary. Methods such as laser-induced plasma spectroscopy and optical emission spectroscopy are suitable for this. They enable us to take the single-variety batches into account in the best possible way when compiling and calculating the material mix. In addition to scrap, we also produce and trade in primary raw materials as an all-round supplier and create added value in this form. We achieve this with additional services such as the milling of ferroalloys for powder metallurgy.

Thus, the main business activity of the entire group of companies covers the trading, preparation and reworking of alloy waste material as well as trading in ferroalloys, metals, and stainless steels. The most important product groups as well as our services are as follows:

Trade & Sales

- Trade with Primary- & Secondary Raw Material

Recycling

- Stainless Steel
- Super- & Special Alloys
- High Speed- & Tool Steel
- Titanium
- Carbides
- Engine Destruction
- Processing Industrial Sludges

Production

- Ferro-Molybdenum
- Ferro-Titanium
- Metal Powder for Powder Metallurgy

Services

- Analytics
- Documented Mutilation of Serialized Aircraft Components
- Wage Labor Pressing, Crushing, Briquetting
- Integrated Steel Mill-Services
- Storage- & Transport Logistics

Brands

Our company has eight registered brands through which we operate globally. The list of trademarks are below.

Allocation	Brand	Logo
Word mark	CRONIMET	CRONIMET
Word mark / figurative mark	CF CRONIMET	 CRONIMET
Word mark	CRONIFOND	/
Word mark	Metalloy	/
Word mark / figurative mark	NL Nichel Leghe CF Gruppo Cronimet	 Nichel Leghe <small>GRUPPO CRONIMET</small>
Word mark / figurative mark	CRONIMET Cremetal	 CRONIMET <small>Cremetal GmbH</small>
Word mark / figurative mark	CF CRONIMET anname metallile uue elu	 CRONIMET <small>anname metallile uue elu</small>
Word mark / figurative mark	Metall Service Pedack	 MSP <small>Metall Service Pedack GmbH</small>

Disclosure 102-3: Location of headquarters

CRONIMET Holding GmbH
 Südbeckenstraße 22
 76189 Karlsruhe
 Germany

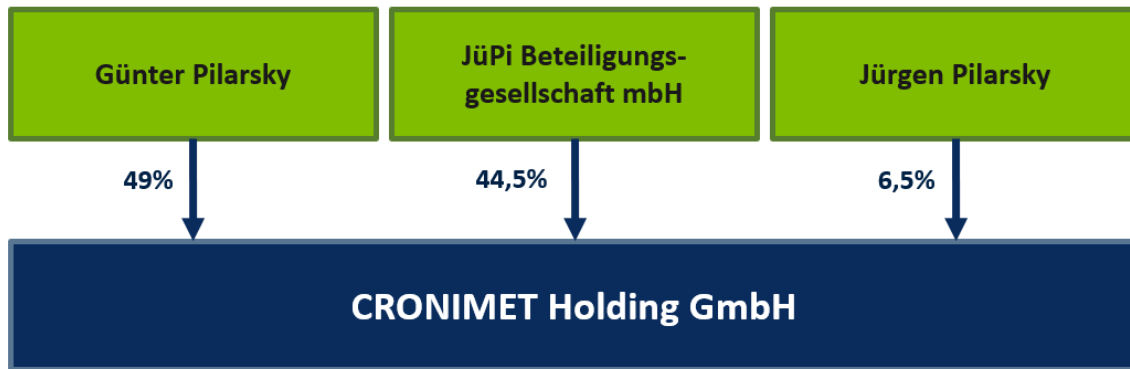
Disclosure 102-4: Location of operations

CRONIMET operates in 23 countries which are listed below:

- Armenia
- Australia
- Brazil
- Czech Republic
- England
- Estonia
- Finland
- France
- Germany
- Holland
- Italy
- Latvia
- Northern Ireland
- Poland
- Scotland
- Singapore
- South Africa
- Spain
- Sweden
- Switzerland
- Turkey
- USA
- Wales

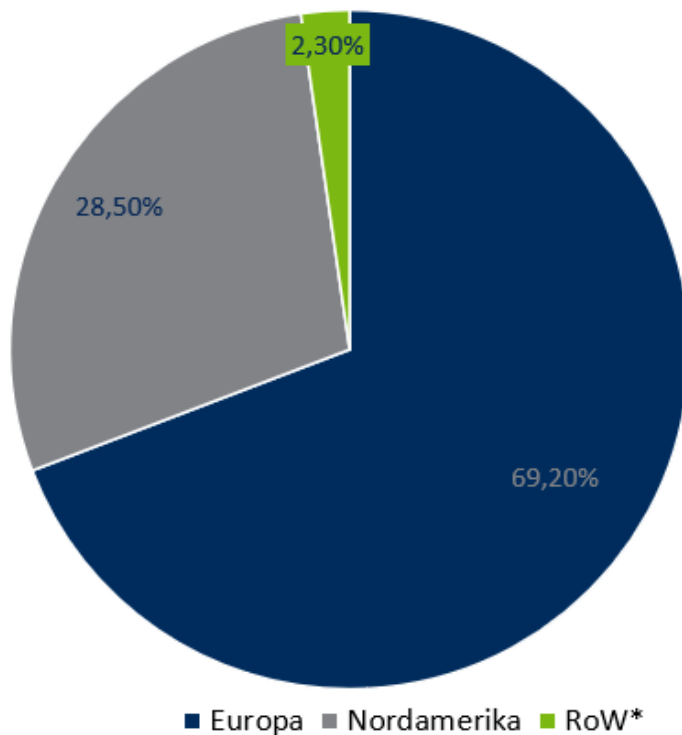
Disclosure 102-5: Ownership and legal form

CRONIMET Holding is a limited liability company (GmbH). See the chart below for the ownership structure:



Disclosure 102-6: Markets served

Our customers are usually steel mills. The percentage distribution across continents of our stainless steel tonnage 2021 can be seen in the following chart:



Tonnage 2021: 1,591,184 mt

*RoW: Asien, Brasilien und Südafrika

Disclosure 102-7: Scale of the organization

a. Scale of the organization, including:

i. total number of employees;

Total number of employees worldwide (as of 31 December 2021): 1,633 employees

ii. total number of operation;

74 operations

iii. net sales (for private sector organizations) or net revenues (for public sector organizations);

External sales volume:

- Stainless Division: 1,570,114 mt
(previous year 2020: 1,370,478 mt; + 15%)
- Specialty Metals Division: 49,522 mt
(previous year 2020: 43,985 mt; + 13%)
- External drop shipments: 177,769 mt
(previous year 2020: 131,739 mt; +35%)

Purchased volume:

- Stainless Division: 1,579,005 mt
(previous year 2020: 1,291,514 mt; + 22%)
- Specialty Metals Division: 48,741 mt
(previous year 2020: 45,033 mt; + 8%)

iv. total capitalization (for private sector organizations) broken down in terms of debt and equity;

- Turnover: 3,379,528,000 €
- Personnel expenses: 90,142,000 €
- Net profit for the year: 35,279,000 €
- Depreciation and amortization: 44,945,000 €
- Equity Capital: 207.698.527,000 €
- Debt Capital: 928.567.600,000 €

v. quantity of products or services provided.

CRONIMET buys the scrap through a worldwide network of traders and afterwards analyzes, sorts, and processes them. We return them as secondary raw material to the cycle. Our products – material mixtures especially made according to customer

requirements – are directly processed by manufacturing companies and are used in a wide range of branches and industries. Thus, no quantified number of products or services can be provided.

The products are as follows:

STAINLESS

- Stainless Steel Scrap:
Cr/Ni/Mo Solids and Turnings, Cr/Ni/Mo Remelted Ingots, Cr/Ni/Mo Runnings, Cr/Ni/Mo Soft scrap and powder, Cu containing Cr/Ni/Mo qualities, Other Cr/Ni/Mo qualities

HSS / CrMoV

- HSS:
DMo5 / M2 / 1.3343 Solids and Turnings, EMo5Co5 / M35 / 1.3243 Solids and Turnings, M42 / 1.3247 Solids and Turnings, B18 / T1 / 1.3355 Solids, Other Cr/Mo/W/V/Co qualities
- CrMoV:
H11 / 1.2343 Solids and Turnings, H13 / 1.2344 Solids and Turnings, H10 / 1.2365 Solids and Turnings, Solids and Turnings, D2 / 1.2379 Solids and Turnings, Other Cr/Mo/V qualities

TUNGSTEN CARBIDE

- Tungsten Carbide Scrap (WC):
Inserts, Drills, saws and cutters, Wire dies / Die tools, Mining tools (e.g. Mining bits), Soft Scrap / Powders, Grinding Sludges
- Tungsten Alloys:
Densalloy, Heavymet

TITANIUM

- Titanium CP:
Refinery grade (Basis 98% Ti), Turnings (Basis 98% Ti), CP (vacuum grade) light, CP (vacuum grade) heavy
- Alloyed Titanium:
Refinery grade (Basis 88% Ti), 90/60/4 (Grade 5) Feedstock, 90/60/4 (Grade 5) Bulk Weldable, 6/7 Feedstock, Turnings (Basis 88% Ti)
- FeTi

SUPER & SPECIAL ALLOYS

- Ni based Alloys:
Alloy 718, Alloy 625, Alloy 617, Alloy 713, Alloy C4, Alloy C276, Alloy C263, Alloy X, Waspalloy, Rene 41
- Co based Alloys:
Alloy 25, Alloy 188, Alloy F75
- NiCo Alloys:
Maraging, Kovar, NiCo refinery scrap
- CuNi Alloys:
Monel, German Silver, NiCu refinery scrap, Other NiCu scrap

NEW METALS & PURE METAL SCRAP

- New Metals & Pure Metal Scrap:
Nickel, Chromium, Molybdenum, Titanium, Tungsten, Niobium, Tantalum, Zirconium, Cobalt, Rhenium, Vanadium, Manganese

FERRO ALLOYS

- Ferro Alloys:
Ferronickel, Ferrochrome, Ferromolybdenum, Ferrotitanium, Ferrotungsten, Ferroniobium, Ferrovanadium, Ferrozirconium, Ferroboron

Disclosure 102-8: Information on employees and other workers

Total number of employees worldwide as average 2021 without managing director: 1,577

Total number of employees worldwide (as of 31 December 2021): 1,633

- of which in Germany: 414 employees
- of which abroad: 1,219 employees

In addition, temporary workers (worldwide): 12

- of which in Germany: 0
- of which abroad: 12

Detailed information are not available for the total number of employees. Please see the disclosures of material topics "[Diversity and Equal Opportunities](#)" and "[Occupational Health and Safety](#)".

Disclosure 102-9: Supply Chain

Among other topics, our supply chain processes will be in the focus of attention in the future. CRONIMET uses numerous instruments in the selection and approval of new suppliers as well as supplier evaluation in order to ensure quality.

Approved suppliers

Suppliers who have shown that they are capable of meeting CRONIMET's quality requirements are recorded in lists. Traders only purchase from suppliers who are included in CRONIMET's "List of Approved Suppliers".

As it is a declared goal of CRONIMET to expand its circle of suppliers, the traders are keen to acquire new suppliers who appear suitable to meet CRONIMET's quality requirements.

Selection and approval of new suppliers

Suppliers can recommend themselves to the CRONIMET purchaser by, among other things:

- they maintain an effective quality management system (environmental aspects included),
- the purchaser has assured himself of the quality of the supplier's material or performance on the supplier's premises,
- it is known that they have already supplied business partners of CRONIMET with material meeting the requirements in the past.

This applies in particular to drop shipments. Prior to acceptance as an "approved supplier" in the case of larger quantities (=suppliers of sufficient importance for CRONIMET), in any case:

- either a sample delivery or the advance sending of a representative sample for analysis must be agreed, during which it is checked whether the quality of the material basically meets the requirements of CRONIMET or the quality management representative of CRONIMET, after consultation with the quality management representative of the CRONIMET Group, together with the purchaser, assures himself that the conditions on the supplier's premises permit the delivery of quality meeting the requirements,
- the purchaser shall explain to the supplier the material type specifications applicable to CRONIMET and inform the supplier of the significance of its deliveries for CRONIMET's own quality capability.

If the first delivery shows that the new supplier delivers in accordance with the requirements, the trader shall apply to CRONIMET's quality management representative for the supplier to be included in CRONIMET's "List of Approved Suppliers".

After verification, the quality management representative of CRONIMET shall arrange for the inclusion in the "List of Approved Suppliers" kept in the electronic data processing system or shall carry this out himself.

Assessment of suppliers

A system exists that regularly assesses the suppliers regarding the fulfilment of the quality requirements. The evaluation of the suppliers, which is recorded in the most recent "List of Approved Suppliers" or which can be called up in the event of changes, is carried out by the respective dealer/managing director of CRONIMET on the basis of the following evaluation criteria:

- Quality capability (number and severity of refusals/complaints as well as complaints)
- Results of incoming goods inspections
- Reliability (adherence to delivery dates),
- Price and payment morale (creditworthiness) of CRONIMET's suppliers.

Changes in the evaluation of individual suppliers are immediately notified to the quality management representative of CRONIMET who, after checking, initiates the recording of the corresponding change in the "List of Approved Suppliers at CRONIMET", as well as handwritten on the "List of Approved Suppliers" provided to the individual traders by the quality management representative of CRONIMET once a year.

The evaluation scale ranges from A to C:

- A = very good – good
- B = average – with minor defects
- C = with major defects

The evaluation figures are kept for a period of two years and are periodically subjected to a trend analysis by CRONIMET's quality management representative, which is discussed and evaluated with the respective dealers/managing directors.

Changes in the evaluation are marked accordingly on the most recent supplier list by the dealers/managing directors or quality management representative and immediately communicated in writing to the departments concerned.

The quality management representative of CRONIMET evaluates the results of the incoming inspections every six months, but at least once a year. The assessment of the effects of complaints and reclamations on CRONIMET's business activities serves to monitor the quality capability of the individual business partners and to compare them with each other.

In the future, extended consideration will be given to environmental, social, and governance criteria alongside quality requirements.

Disclosure 102-10: Significant changes to the organization and its supply chain

Summary of changes in 2021

- Change in ownership structure (entry of JÜPI Beteiligungsgesellschaft mbH, see ownership chart). A milestone was the takeover of shares by Jürgen Pilarsky in July 2021. Since then, he has been the majority shareholder of CRONIMET Holding GmbH. The new structure: Jürgen Pilarsky with 51 percent and company founder Günter Pilarsky with 49 percent.
- CRONIMET Holding GmbH has sold its Belgian subsidiary CRONIMET Belgium NV.
- Operative place in Santa Fe (USA) closed
- Operational site in Singapore closed
- New site added in Lulea (Sweden)
- Entry into the battery recycling sector with the Australian company Pure Battery Technologies Pty Ltd.

There were no changes in the supply chain in 2021. The changes in company shares are explained in more detail below.

Changes in company shares

In spring 2021, we purchased shares (7.5 %) from a minority shareholder of CRONIMET Finland Oy, thus increasing our share in the company to 75 %.

In the first quarter of 2021, we acquired 11.41 % of the shares of CRONIMET Alfa, Munich, from a minority shareholder, thus increasing our share in the company to 63.41 %. In the summer, we acquired from CRONIMET Verwaltungs GmbH both its 30 % share in CRONIMET Legierungen Dortmund GmbH and its 40 % share in CRONIMET Services GmbH. As a result, we are now the sole shareholder in both companies. In the 4th quarter we bought the 40 % shares of the minority shareholder of Schach Matt GmbH and have been the sole shareholder since then.

Moreover, we acquired the share the minority shareholder of Metall Service Pedack GmbH, Karlsruhe, and are now the sole shareholder. In addition, we increased the capital of our subsidiary CRONIMET Shanghai Ltd. by the equivalent of EUR 5,534,000 within the framework of a debt-to-equity swap.

We also increased the equity of our subsidiary CRONIMET Brasil Ltda. by the equivalent of EUR 488,000 through a debt-to-equity swap.

Furthermore, in the summer of 2021 we increased the capital of Battery Metals Pte. Ltd. in Singapore, in which we were previously the majority shareholder with 51 %, by a total of EUR 1,500,000. The capital increase was divided equally between minority shareholders and us. This slightly diluted our share to 50.72 %.

Battery Metals Pte. Ltd. itself exercised an option and increased its shares in Pure Battery Technologies AG, Germany to 40 % in the first step. Subsequently, the decision was made to exchange this 40 % for 7 % shares in its parent company Pure Battery Technologies Pty. Ltd, Australia.

Disclosure 102-11: Precautionary Principle or approach

Instead, risk management is seen as the active management of risks in order to avoid jeopardizing the existence of the company on the one hand and to make the risk situation transparent to the shareholders and the management on the other. External requirements, such as those of banks and auditors, should also be met. Furthermore, risk management contributes to being able to exploit strategic and operational opportunities for corporate development to ensure profitable growth.

The primary goals of risk management are:

- Increasing transparency in risk situations and thus facilitating management decision-making processes
- Optimizing the allocation of resources to improve the risk situation
- Raising risk awareness among employees
- Creation and strengthening of trust by stakeholders in management and organization
- Support in securing the future success of the company
- Support in securing/achieving the company's goals
- Contribution to increasing the value of the company, especially the equity value
- Optimization of risk costs

In concrete terms for the CRONIMET Group, this means that "developments that pose a threat to the company's existence" should be recognized at an early stage and immediate action needs to be taken against them.

Disclosure 102-12: External initiatives

There have been no relevant initiatives in 2021.

Disclosure 102-13: Membership of associations

- Federal Association of German Steel Recycling and Waste Management Companies (BDSV)
- Association of German Metal Traders and Recyclers e.V. (VDM)

2. Strategy

Disclosure 102-14: Statement from senior decision-maker

Statement from CEO Jürgen Pilarsky:

As CEO of CRONIMET, I am proud to present our latest Sustainability Report, which transparently showcases our commitment to social and environmental responsibility, as well as our strong focus on corporate governance. For over 40 years, sustainability has been at the core of our business model, as we strive to ensure that raw materials are returned to the materials cycle and promote sustainable practices throughout our operations. However, we recognize that there is always more we can do, and as a company, we are committed to making sustainability the foundation of all our business activities. We understand that in today's world, companies like CRONIMET have a vital role to play in promoting social responsibility and addressing global challenges such as climate change and social inequality. At CRONIMET, we believe that our employees are our greatest asset, and we work to ensure that they are fully committed to our values and mission. We also invest in innovative technologies and new business areas to ensure that we remain a leading supplier of primary and secondary raw materials. Our decision-making processes are guided not only by financial considerations, but also by numerous non-financial indicators, and we are well on our way to achieving our ambitious targets, including climate neutrality by 2030. We see the diversity and global presence of our CRONIMET Group as a great opportunity and invite you to join us on this journey towards a fairer and more sustainable future for all. At CRONIMET, we are ONE team, united by competence and passion, and committed to our positive development and success.

Our targets for 2025

Finance: We ensure our business through a solid equity ratio and an appropriate return on sales, as well as through long-term debt financing. Our CSR activities increase our attractiveness for investors.

Market: We strive to grow in correlation with the market in the stainless core business, while also increasing our earnings in non-stainless and new business areas.. We divest non-strategic and unprofitable business units.

Processes: We use the synergies of our internal and external network and improve our efficiency through modern technologies and IT systems. Standards implemented throughout the Group ensure transparency and process reliability.

Sustainability: We develop a green product line in cooperation with industry partners, and we are recognized for our eco-efficient services and products. We measure and continuously reduce the CO₂ footprint of our operations, with the ultimate goal of CO₂ neutrality within this decade. We establish a detailed sustainability reporting in order to create transparency and measure our performance.

3. Ethics and Integrity

Disclosure 102-16: Values, principles, standards, and norms of behavior

Corporate values

Our [corporate values](#) are defined as follows:

- 1) We think and act entrepreneurially: For CRONIMET this means that we are always open to new ideas.
- 2) We continuously evolve as a learning company.
- 3) We treat each other the way we want to be treated ourselves.
- 4) We are the most important contact for our business partners.
- 5) We are aware of our social and ecological responsibility for the community.

Management Principles

For effective involvement of employees in all developments, to give them a sense of security and orientation and to strive for success as a team, we have defined four leadership principles, which are based on trust. Trust in each individual's abilities is the foundation of our company.

1) Openness

- We share our knowledge and provide information.
- We promote equal and cross-functional teamwork.
- We give freedom to act and make decisions.

2) Learning

- We question our actions in order to improve continuously.
- We give feedback in an appreciative and constructive manner with the aim of further development, motivation and inspiration.
- We analyze mistakes and consistently implement the resulting findings to avoid and improve mistakes in the future.

3) Caring

- We take time for our employees and support them in their personal and professional development.
- We create a pleasant working atmosphere and treat diversity openly, fairly and tolerantly.
- We promote the compatibility of work, family and free time.

4) Progress

- We pursue our goals consistently and communicate them clearly and comprehensively.
- We make comprehensible, reliable decisions and ensure their implementation.
- We see ourselves as a driving force for the development of new ideas.

Code of Conduct

The objective of the [Code of Conduct](#) is to provide information about the legal situation and the fundamental principles of the philosophy of the CRONIMET enterprise. It primarily serves to provide orientation to our employees and is aimed at unimpeachable conduct at the workplace that is characterized by honesty and fairness in dealings with other employees, customers, suppliers, competitors, the authorities and the general public.

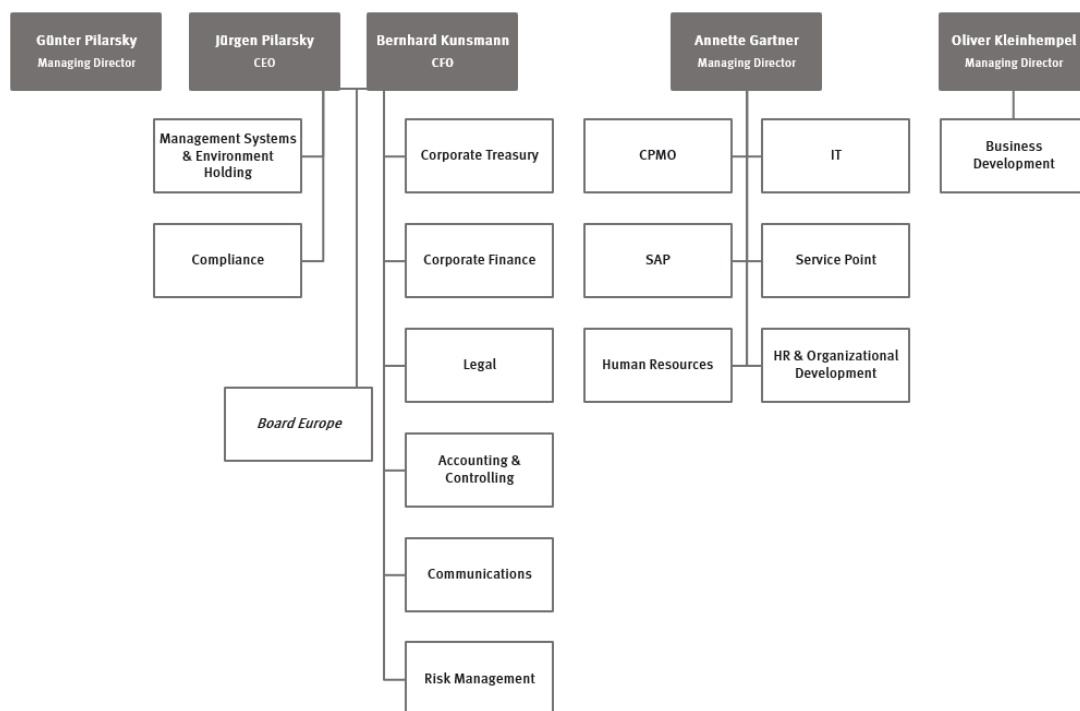
4. Governance

Disclosure 102-18: Governance structure

The management body of CRONIMET Holding GmbH in Karlsruhe consists of:

- Günter Pilarsky
- Jürgen Pilarsky
- Annette Gartner
- Oliver Kleinhempel
- Bernhard Kunsmann

The area of responsibility of each board member is presented below:



5. Stakeholder Engagement

Disclosure 102-40: List of stakeholder groups

- Customers (core business)
- Banks (current)
- Employees
- Managers / Managing Directors
- Owner
- Legislators
- Suppliers of the primary raw materials
- Suppliers for scrap (secondary)
- Others

Disclosure 102-41: Collective bargaining agreements

CRONIMET works together with employee representatives in a spirit of trust. The majority (approximately 90 percent) of our employees worldwide work in organizational units in which there are no employee representatives and no collective bargaining regulations.

If the employer is bound by a collective agreement, CRONIMET undertakes in the employment contract that the respective collective agreement will apply. In some cases, German subsidiaries apply the collective bargaining regulations voluntarily.

CRONIMET employees can also organize themselves in trade unions at international level. At foreign locations where no company representatives are specified or established, selected employees assume the function of contact persons for employee matters.

Disclosure 102-42: Identifying and selecting stakeholders

In 2021, we internally started to define all relevant stakeholders. CRONIMET identified and selected the most important stakeholders with the help of a stakeholder matrix, which is divided into two dimensions: "Influence of stakeholders on the company" and "Interest of stakeholders in the company". The most important stakeholders are located in the quadrants "Strong influence on the company" and / or "high interest in the company".

Based on the selection, we also identified the stakeholders' expectations on CRONIMET via questionnaires and round tables as well as analyzed which expectations have already been fulfilled. Moreover, we analyzed to what extent unfulfilled expectations can be fulfilled in the future. We will continue this process, together with our stakeholders, discuss the key issues in an open dialog at regular intervals and add new aspects relating to our corporate responsibility. This Sustainability Report is a key component of the stakeholder dialog.

Disclosure 102-43: Approach to stakeholder engagement

We are convinced that companies need the consent and cooperation of society. We want to be in open and continuous dialog with all stakeholders. We see this as an opportunity to adapt to new requirements at an early stage, to avoid risks and to realize potential.

CRONIMET constantly exchanges information with a wide range of target groups worldwide: Employees, customers, suppliers, banks, journalists, politicians, authorities and associations. We conduct dialog at different management levels, at different locations and through different departments. The focus is always on the personal conversation, the direct contact. In addition, we communicate with our stakeholders via:

- Surveys (e.g., sustainability, employer attractiveness),
- Publications (such as press releases, employee magazine),
- Events (bank meetings, supplier meetings, events for managers and employees, Corporate Social Day),
- Participation in committees,
- Appearances (e.g., through presentations) at external events.

Disclosure 102-44: Key topics and concerns raised

- CO₂ balancing in the group was strengthened by customer requests
- Discussions regarding green product lines with customers and suppliers
- Ensuring resource security through recycling cycles

6. Reporting Practice

Disclosure 102-45: Entities included in the consolidated financial statements

In addition to CRONIMET Holding GmbH, all companies that are directly or indirectly controlled by CRONIMET Holding GmbH are included in the consolidated financial statements. Therefore, only full consolidation is applied. There are no circumstances for at-equity consolidation. An overview of the consolidated companies:

Company	Consolidation procedure	Comments
CRONIMET Holding GmbH	Full consolidation	Parent Corporation
CRONIMET Raw Materials Suisse AG	Full consolidation	
CRONIMET Raw Materials GmbH	Full consolidation	
CRONIMET PL Sp. z.o.o. (Poland)	Full consolidation	Subgroup; also includes its subsidiary CRONIMET Ostrava, s.r.o
Schach-Matt Handels + Vertriebs GmbH	Full consolidation	
CRONIMET Noble Alloys Handelsgesellschaft mbH	Full consolidation	
CRONIMET Singapore Pte. Ltd.	Full consolidation	
CRONIMET ALFA Ferrolegerungen Handels GmbH	Full consolidation	
CRONIMET Asia Pte. Ltd.	Full consolidation	
CRONIMET Australia Pty. Ltd.	Full consolidation	
CRONIMET Brasil Ltda.	Full consolidation	
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	Full consolidation	
CRONIMET Fagersta AB	Full consolidation	Subgroup; also includes its subsidiaries CRONIMET Norr, CRONIMET Skelleftea, CRONIMET Umea & Lulea Industrifastigheter
CRONIMET Finland Oy	Full consolidation	
CRONIMET France SAS	Full consolidation	
CRONIMET (Great Britain) Ltd.	Full consolidation	
CRONIMET Hispania, S.A.	Full consolidation	
CRONIMET Holdings, Inc.	Full consolidation	Subgroup; also includes its subsidiaries CRONIMET Corp, United Alloys, Unico Alloys, CRONIMET Specialty Metals, CRONIMET Domestic International & Metals Financial Group.
CRONIMET Holland b.v.	Full consolidation	

CRONIMET Italia	Full consolidation	Company is in liquidation
CRONIMET Ferroleg. GmbH	Full consolidation	
CRONIMET Nordic OÜ	Full consolidation	Subgroup; also includes its subsidiary CRONIMET Latvia
CRONIMET RSA (PTY) Ltd.	Full consolidation	
CRONIMET S.A. (Lugano)	Full consolidation	
CRONIMET Shanghai Co., Ltd	Full consolidation	
CRONIMET Suisse AG	Full consolidation	
CRONIMET Turkey Metal Ticaret A.S.	Full consolidation	
Cronifer UK Ltd.	Full consolidation	
CRONIMET Envirotec GmbH	Full consolidation	
ERG Edelstahl Recycling GmbH	Full consolidation	
Metalloy Metalle-Legierungen GmbH	Full consolidation	
Metall Service Pedack GmbH	Full consolidation	
Nichel Leghe SpA	Full consolidation	
Battery Metals Pte. Ltd.	Full consolidation	
OJSC Plant of Pure Iron	Full consolidation	
CRONIMET Services GmbH	Full consolidation	

The GRI report includes all locations that are material to our operating result and / or our long-term strategy. It does not include our representative offices, commercial agencies, joint ventures in which we do not have a majority stake, or subsidiaries that are up for sale. These include our subsidiary Pure-Iron, based in Armenia, for whose shares we have already concluded a sales agreement in 2019, which will be completed in 2024 at the latest.

Disclosure 102-46: Defining report content and topic boundaries

The Sustainability Report 2021 of CRONIMET Holding GmbH has been prepared in accordance with the GRI Standards: Reference The reporting has been prepared in accordance with the following principles, which are also provided by the GRI:

Principles of reporting to determine the content of the report	Principles of reporting to ensure reporting quality
<ul style="list-style-type: none"> Stakeholder involvement Sustainability context Materiality Completeness 	<ul style="list-style-type: none"> Accuracy Balance Comprehensibility Reliability

In order to identify our material topics, a project team created a longlist of potential topics. Via questionnaires, workshops and interviews with relevant stakeholders our final material topics were identified in 2021. The topics were then assigned to the **materiality matrix** along the categories (E)nvironment, (S)ocial and (G)overnance. The material topics are listed in detail in Disclosure 102-47.

Not all topics of business activity are highlighted. It is limited to a selection of essential topics that show the economic, ecological, and social impact of CRONIMET or are of particular interest to our stakeholders. Within the scope of an employee survey in 2021, we were able to make an initial narrowing down from a collected pool of topics. In addition, the topics surveyed could be evaluated from different perspectives, which was decisive for the classification in terms of materiality.



Disclosure 102-47: List of material topics

For reasons of simplicity, this report is divided into the three categories of (E)nvironment, (S)ocial and (G)overnance. The eleven defined material topics are dealt with in detail in the respective subarea using the appropriate GRI modules. The breakdown is as follows:

Environment

- Climate Change
- Waste Management
- Sustainability of Trading Goods and Services

Social

- Recruitment and Retention (Work-Life Balance)
- Occupational Health and Safety
- Training and Development
- Diversity and Equal Opportunities
- Philanthropic Activities / Contributions
- Responsibility in the Supply Chain

Governance

- Compliance and Good Corporate Governance
- Risk Management and Anti-Corruption

Disclosure 102-48: Restatements of information

As this is the first Sustainability Report, no material information has been restated related to the previous report.

Disclosure 102-49: Changes in reporting

As this is the first report, there are no changes in reporting.

Disclosure 102-50: Reporting period

The Sustainability Report covers the year 2021.

Disclosure 102-51: Date of most recent report

The present report is the most recent one as it is the first by CRONIMET.

Disclosure 102-52: Reporting cycle

The reporting cycle is set to annual reporting.

Disclosure 102-53: Contact point for questions regarding the report

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Disclosure 102-54: Claims of reporting in accordance with the GRI Standards

The Sustainability Report 2021 of CRONIMET Holding GmbH has been prepared in accordance with the GRI Standards: Reference.

Disclosure 102-55: GRI content index

GRI Content Index			
GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omission
General Disclosures			
GRI 102: General Disclosures 2016	102-1 Name of the organization	2	
	102-2 Activities, brands, products, and services	2	
	102-3 Location of headquarters	4	
	102-4 Location of operations	4	
	102-5 Ownership and legal form	5	
	102-6 Markets served	5	
	102-7 Scale of the organization	6	
	102-8 Information on employees and other workers	8	
	102-9 Supply chain	9	
	102-10 Significant changes to the organization and its supply chain	11	
	102-11 Precautionary Principle or approach	11	
	102-12 External initiatives	11	
	102-13 Membership of associations	11	
	102-14 Statement from senior decision-maker	13	
	102-16 Values, principles, standards, and norms of behavior	14	
	102-18 Governance structure	16	
	102-40 List of stakeholder groups	17	
	102-41 Collective bargaining agreements	17	
	102-42 Identifying and selecting stakeholders	17	
	102-43 Approach to stakeholder engagement	18	
	102-44 Key topics and concerns raised	18	
	102-45 Entities included in the consolidated financial statements	19	
	102-46 Defining report content and topic Boundaries	20	
	102-47 List of material topics	22	
	102-48 Restatements of information	22	
	102-49 Changes in reporting	22	
	102-50 Reporting period	22	
	102-51 Date of most recent report	23	
	102-52 Reporting cycle	23	

	102-53 Contact point for questions regarding the report	23	
	102-54 Claims of reporting in accordance with the GRI Standards	23	
	102-55 GRI content index	24	
	102-56 External assurance	28	
Material topics			
Climate Change			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	30	
	103-2 The management approach and its components	30	
	103-3 Evaluation of the management approach	30	
GRI 201: Economic Performance 2016	201-2: Financial implications and other risks and opportunities due to climate change	31	
GRI 302: Energy 2016	302-1: Energy consumption within the organization	32	
GRI 305: Emissions 2016	305-1: Direct (Scope 1) GHG emissions	37	
	305-2: Energy indirect (Scope 2) GHG emissions	40	
Waste Management			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	43	
	103-2 The management approach and its components	43	
	103-3 Evaluation of the management approach	43	
GRI 306: Waste 2020	306-1: Waste generation and significant waste-related impacts	44	
	306-2: Management of significant waste-related impacts	44	
	306-3: Waste generated	45	
	306-4: Waste diverted from disposal	46	
	306-5: Waste directed to disposal	49	
Sustainability of Trading Goods and Services			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	52	
	103-2 The management approach and its components	52	
	103-3 Evaluation of the management approach	52	
GRI 301: Materials 2016	301-1: Materials used by weight or volume	53	
	301-2: Recycled input materials used	53	

Recruitment and Retention (including Work-Life Balance)			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	55	
	103-2 The management approach and its components	55	
	103-3 Evaluation of the management approach	55	
401: Employment 2016	401-1: New employee hires and employee turnover	56	
	401-2: Benefits provided to full-time employees that are not provided to temporary or part-time employees	58	
	401-3: Parental leave	60	
Occupational Health and Safety			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	62	
	103-2 The management approach and its components	62	
	103-3 Evaluation of the management approach	62	
GRI 403: Occupational Health and Safety 2018	403-1: Occupational health and safety management system	64	
	403-2: Hazard identification, risk assessment, and incident investigation	65	
	403-3: Occupational health services	68	
	403-4: Worker participation, consultation, and communication on occupational health and safety	68	
	403-5: Worker training on occupational health and safety	69	
	403-6: Promotion of worker health	70	
	403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	72	
	403-8: Workers covered by an occupational health and safety management system	72	
	403-9: Work-related injuries	73	
Training and Development			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	76	
	103-2 The management approach and its components	76	
	103-3 Evaluation of the management approach	76	
GRI 102: Ethics and Integrity 2016	102-16: Values, principles, standards, and norms of behavior	77	

	102-17: Mechanisms for advice and concerns about ethics	77	
GRI 404: Training and Education 2016	404-1: Average hours of training per year per employee	78	
	404-2: Programs for upgrading employee skills and transition assistance programs	79	
	404-3: Percentage of employees receiving regular performance and career development reviews	80	
Diversity and Equal Opportunities			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	81	
	103-2 The management approach and its components	81	
	103-3 Evaluation of the management approach	81	
GRI 405: Diversity and Equal Opportunity 2016	405-1: Diversity of governance bodies and employees	82	
Philanthropic Activities / Contributions			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	88	
	103-2 The management approach and its components	88	
	103-3 Evaluation of the management approach	88	
GRI 201: Economic Performance 2016	201-1: Direct economic value generated and distributed	89	
Responsibility in the Supply Chain			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	90	
	103-2 The management approach and its components	90	
	103-3 Evaluation of the management approach	90	
GRI 102: General Disclosures 2016	102-9: Supply chain	91	
	102-10: Significant changes to the organization and its supply chain	91	
GRI 308: Supplier Environmental Assessment 2016	308-1: New suppliers that were screened using environmental criteria	91	
	308-2: Negative environmental impacts in the supply chain and actions taken	92	
Compliance and Good Corporate Governance			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	98	
	103-2 The management approach and its components	98	

	103-3 Evaluation of the management approach	98	
GRI 102: General Disclosures 2016	102-56: External assurance	101	
GRI 307: Environmental Compliance 2016	307-1: Non-compliance with environmental laws and regulations	101	
GRI 419: Socioeconomic Compliance 2016	419-1: Non-compliance with laws and regulations in the social and economic area	102	
Risk management and Anti-corruption			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundaries	98	
	103-2 The management approach and its components	98	
	103-3 Evaluation of the management approach	98	
GRI 205: Anti-corruption 2016	205-1: Operations assessed for risks related to corruption	103	
	205-2: Communications and training about anti-corruption policies and procedures	104	
	205-3: Confirmed incidents of corruption and actions taken	106	

Disclosure 102-56: External assurance

To ensure quality and credibility, this first Sustainability Report will be subject to a review of an independent auditing company before its publication. This audit support will help us in future to improve our reporting quality. The pre-selection of the auditing companies as well as the commissioning proposal is made by the responsible department.

Environment

Climate Change

Waste Management

A. Environment

1. Climate Change

GRI 103: Management Approach 2016

The Intergovernmental Panel on Climate Change (IPCC) is clearly stating: The current climate change we experience is a fact and is mainly influenced by human actions. The atmosphere and oceans are getting warmer. Glaciers and permafrost are thawing, and sea levels are rising. Above all, the burning of fossil fuels like gas and oil is upsetting the Earth's energy balance and the main reason why the concentration of carbon dioxide in the atmosphere is still rising.

CRONIMET also relies on fossil fuels in order to process, load and transport materials. The goal to become a carbon-neutral company by 2030 is anchored in the strategic corporate objectives. To calculate the carbon emissions and formulate the reduction targets CRONIMET orients itself on the methodologies of the Greenhouse Gas Protocol and the Science Based Targets initiative. The included sites are listed in a table under [GRI 302-1](#). The figures shown include the total energy consumption and the related carbon emissions according to Scopes 1 and 2 of the Greenhouse Gas Protocol except fossil fuels for company cars. The future extension of CRONIMET's greenhouse gas accounting will incorporate the company cars and Scope 3 of the Greenhouse Gas Protocol as well.

The following disclosure includes the data of those locations that are material to our operating result and / or our long-term strategy to the extent all relevant data are available – except representative offices, commercial agencies, joint ventures in which we do not have a majority stake, or subsidiaries that are up for sale.

GRI 201: Economic Performance 2016

The part following below addresses the topic of economic performance. This includes the economic value generated and distributed (EVG&D) by an organization, its defined benefit plan obligations, the financial assistance it receives from any government, and the financial implications of climate change.

Disclosure 201-2: Financial implications and other risks and opportunities due to climate change

- a. Risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue, or expenditure, including:**
- i. a description of the risk or opportunity and its classification as either physical, regulatory, or other;*
 - ii. a description of the impact associated with the risk or opportunity;*
 - iii. the financial implications of the risk or opportunity before action is taken;*
 - iv. the methods used to manage the risk or opportunity;*
 - v. the costs of actions taken to manage the risk or opportunity.*

There is a risk screening every year. No risks have been identified in relation to climate change. The probability and extent of risk as well as the amounts of damage are low. We see clear opportunities with a view to the growing importance of circular economy in politics, as it opens up new business areas for us. In the future, products are designed with an even higher focus on recyclability, resulting in better recovery rates for CRONIMET in recycling.

GRI 302: Energy 2016

The part following below addresses the topic of energy. An organization can consume energy in various forms, such as fuel, electricity, heating, cooling or steam. Energy can be self-generated or purchased from external sources and it can come from renewable sources (such as wind, hydro or solar) or from non-renewable sources (such as coal, petroleum or natural gas). Using energy more efficiently and opting for renewable energy sources is essential for combating climate change and for lowering an organization's overall environmental footprint. Energy consumption can also occur throughout the upstream and downstream activities connected with an organization's operations. This can include consumers' use of products the organization sells, and the end-of-life treatment of these products.

Disclosure 302-1: Energy consumption within the organization

a. Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.

The following values are given uniformly in kWh (kilowatt hour). In case of conversion to joules, the conversion key is 1 kWh = 3,600,000 J.

Corporation	Natural gas	Heating oil	Diesel	Lpg / propane	Total
Total	6,287,764.70	840,054.17	40,171,889.38	415,021.49	47,714,729.74
Cronifer UK Ltd.	0	35,716.71	46,164.60	0	81,881.31
CRONIMET (Great Britain) Ltd.	0	0	939,845.52	0	939,845.52
CRONIMET (Holland) b.v.	202,213.57	0	3,191,014.68	0	3,393,228.25
CRONIMET RSA (PTY) Ltd.	18,707.53	0	1,171,014.13	0	1,189,721.66
CRONIMET ALFA Ferro-legierungen Handels GmbH	0	0	885,738.02	0	885,738.02
CRONIMET Brasil Ltda.	0	0	2,852,372.89	6,027.36	2,858,400.16
CRONIMET Holdings, Inc.	2,085,552.35	0	10,221,315.45	408,994.13	14,824,387.90
Metall Service Pedack GmbH	110,319.00	0	333,809.40	0	444,128.40
CRONIMET Envirotec GmbH	1,466,890.00	46,720.00	141,670.80	0	1,655,280.80
CRONIMET Fagersta AB	0	104,470.00	3,145,407.84	0	3,249,877.84
CRONIMET Ferroleq. GmbH	1,142,112.00	190,450.40	2,796,299.88	0	4,128,862.38

CRONIMET HISPANIA, S. A.	0	0	802,995.12	0	802,995.12
CRONIMET Holding GmbH	<i>Included to CRONIMET Ferrolog</i>	<i>Included to CRONIMET Ferrolog</i>	<i>Included to CRONIMET Ferrolog</i>	<i>Included to CRONIMET Ferrolog</i>	<i>Included to CRONIMET Ferrolog KA</i>
CRONIMET Raw Materials GmbH	<i>Included to CRONIMET Ferrolog</i>	<i>Included to CRONIMET Ferrolog</i>	<i>Included to CRONIMET Ferrolog</i>	<i>Included to CRONIMET Ferrolog</i>	<i>Included to CRONIMET Ferrolog KA</i>
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	119,440.00	59,659.88	1,769,812.32	0	1,948,912.20
CRONIMET Nordic OÜ	0	0	2,505,716.88	0	2,505,716.88
CR PL Sp. z.o.o. (Poland)	0	150,084.06	4,737,624.30	0	4,887,708.36
CRONIMET Noble Alloys Handelsgesellschaft mbH	0	149,139.76	796.80	0	149,936.56
CRONIMET Turkey Metal Ticaret A.S.	16,957.07	0	672,595.11	0	689,552.18
ERG Edelstahl Recycling GmbH	0	103,813.36	1,210,209.72	0	1,314,023.08
Metalloy Metalle-Legierungen GmbH	893,915.00	0	18,445.92	0	912,360.92
Nichel Leghe SpA	231,658.18	0	2,729,040	0	2,960,698.18

* The data referring to the amount of diesel only covers the consumption for the machine park. Fuel for passenger cars is not reported as no data is available.

The following CRONIMET subsidiaries were not surveyed due to their insignificance for energy consumption: CRONIMET Raw Materials Suisse AG, Schach-matt Handels + Vertriebs GmbH, CRONIMET Singapore, CRONIMET Asia, CRONIMET Australia, CRONIMET Finland, CRONIMET France, CRONIMET Italia, CRONIMET SA Lugano, CRONIMET Shanghai, CRONIMET Suisse AG, Battery Metals Pte. Ltd. , OJSC Plant of Pure Iron, CRONIMET services GmbH

b. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.

The composition of the fuel mix varies depending on the country. An overview is not available. The composition of CRONIMET Fagersta AB stands out positively as an example, with 26% of the total fuel consumption consisting of HVO (Hydrotreated Vegetable Oils).

c. In joules, watt-hours or multiples, the total:

i. electricity consumption

Corporation	Electricity consumption (in kWh)
Total	17,685,461.47
Cronifer UK Ltd.	66,481.60
CRONIMET (Great Britain) Ltd.	196,734.00
CRONIMET (Holland) b.v.	728,180
CRONIMET RSA (PTY) Ltd.	363,029.69
CRONIMET ALFA Ferrolegerungen Handels GmbH	20,525.70
CRONIMET Brasil Ltda.	434,475.10
CRONIMET Holdings, Inc.	6,644,223.00
Metall Service Pedack GmbH	29,768.00
CRONIMET Envirotec GmbH	1,784,920.00
CRONIMET Fagersta AB	883,348.00
CRONIMET Ferroleger. GmbH + CRONIMET Holding GmbH + CRONIMET Raw Materials GmbH	1,504,058.00
CRONIMET HISPANIA, S. A.	115,438.00
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	581,319.00
CRONIMET Nordic OÜ	357,363.00
CR PL Sp. z.o.o. (Poland)	1,665,850.00
CRONIMET Noble Alloys Handelsgesellschaft mbH	88,802.00
CRONIMET Turkey Metal Ticaret A.S.	27,178.38
ERG Edelstahl Recycling GmbH	148,899.00
Metalloy Metalle-Legierungen GmbH	297,542.00
Nichel Leghe SpA	1,747,327.00

ii. *heating consumption*

Corporation	Heating consumption (in kWh)
Total	7,073,160.99
Cronifer UK Ltd.	35,716.71
CRONIMET (Great Britain) Ltd.	0
CRONIMET (Holland) b.v.	202,213.57
CRONIMET RSA (PTY) Ltd.	18,707.53
CRONIMET ALFA Ferrolegerungen Handels GmbH	0
CRONIMET Brasil Ltda.	0
CRONIMET Holdings, Inc.	2,085,552.35*
Metall Service Pedack GmbH	110,319.00
CRONIMET Envirotec GmbH	1,513,610.00
CRONIMET Fagersta AB	104,470.00
CRONIMET Ferroleger. GmbH + CRONIMET Holding GmbH + CRONIMET Raw Materials GmbH	1,332,562.40
CRONIMET HISPANIA, S. A.	0
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	124,442.00
CRONIMET Nordic OÜ	0
CR PL Sp. z.o.o. (Poland)	150,084.06
CRONIMET Noble Alloys Handelsgesellschaft mbH	149,139.76
CRONIMET Turkey Metal Ticaret A.S.	16,957.07
ERG Edelstahl Recycling GmbH	103,813.36
Metalloy Metalle-Legierungen GmbH	893,915.00*
Nichel Leghe SpA	231,658.18

* Data both for process heat and building heating. Separate values are not available.

iii. *cooling consumption*

Zero

iv. *steam consumption*

Zero

d. In joules, watt-hours or multiples, the total:

i. electricity sold

We cannot provide the electricity sold as no data is available. Data collection regarding sold electricity will be included in the future

ii. heating sold

iii. cooling sold

iv. steam sold

No heating, cooling or steam sold was recorded in 2021.

e. Total energy consumption within the organization, in joules or multiples:

Total fuel consumption:	47,714,729.74 kWh (302-1-a)
+ Electricity consumption:	17,685,461.47 kWh (302-1-c-i)
= Total energy consumption:	65,400,191.21 kWh

f. Standards, methodologies, assumptions, and/or calculation tools used.

To collect the information, consumption data was obtained from the sites and determined by different factors. The internal calculation was based on the GHG Protocol. No external verification took place.

g. Source of the conversion factors used.

The table below is based on recognized kWh conversion factors.

Unit	Conversion factor to kWh
Liter	9.94
m ³	11.04449
thm	29.307107
kg	13.826707
mWh	1,000.00

Disclosure 302-5: Reductions in energy requirements of products and services

We have no available information for the disclosure 302-2 until 302-5. We are currently in the process of implementing a worldwide software solution to be able to carry out this data collection. During implementation, we proceed step by step with the goal of a valid group-wide database. This project is expected to be completed by the end of 2024.

GRI 305: Emissions 2016

The part following below addresses emissions into air, which are the discharge of substances from a source into the atmosphere. Types of emissions include: greenhouse gas (GHG), ozone-depleting substances (ODS), and nitrogen oxides (NOx) and sulfur oxides (SOx), among other significant air emissions. GHG emissions are a major contributor to climate change and are governed by the United Nations (UN) 'Framework Convention on Climate Change' and the subsequent UN 'Kyoto Protocol'. Some GHGs, including methane, are also air pollutants that have significant negative impacts on ecosystems, air quality, agriculture, and human and animal health. As a result, different national and international regulations and incentive systems, such as emissions trading, aim to control the volume and reward the reduction of GHG emissions. The GHG Protocol has established a classification of GHG emissions called 'Scope': Scope 1, Scope 2 and Scope 3 - here we focus on the Scopes 1 and 2. The GHG emissions standard published by the International Organization for Standardization (ISO), 'ISO 14064', represents these classifications of Scope with the following terms: Direct GHG emissions = Scope 1, Energy indirect GHG emissions = Scope 2, Other indirect GHG emissions = Scope 3. Reductions in the emission of regulated pollutants lead to improved health conditions for workers and local communities and can enhance relations with affected stakeholders. In regions with emission caps, the volume of emissions also has direct cost implications. Other significant air emissions include, for example, persistent organic pollutants or particulate matter, as well as air emissions that are regulated under international conventions and/or national laws or regulations, including those listed on an organization's environmental permits.

Disclosure 305-1: Direct (Scope 1) GHG emissions

a. Gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent.

Corporation	Scope 1 GHG emissions (in mt)
Total	12,201.02
Cronifer UK Ltd.	23.45
CRONIMET (Great Britain) Ltd.	244.79
CRONIMET (Holland) b.v.	868.29
CRONIMET RSA (PTY) Ltd.	308.43
CRONIMET ALFA Ferrolegierungen Handels GmbH	230.69
CRONIMET Brasil Ltda.	744.20
CRONIMET Holdings, Inc.	3,377.64
Metall Service Pedack GmbH	107.22
CRONIMET Envirotec GmbH	321.53
CRONIMET Fagersta AB	852.66
CRONIMET Ferroleg. GmbH + CRONIMET Holding GmbH + CRONIMET Raw Materials GmbH	999.20
CRONIMET HISPANIA, S. A.	209.14
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	502.00
CRONIMET Nordic OÜ	652.62
CR PL Sp. z.o.o. (Poland)	1,281.94
CRONIMET Noble Alloys Handelsgesellschaft mbH	47.92
CRONIMET Turkey Metal Ticaret A.S.	178.30

ERG Edelstahl Recycling GmbH	348.41
Metalloy Metalle-Legierungen GmbH	169.15
Nichel Leghe SpA	753.38

b. Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.

CO₂, CH₄, N₂O, HFCs, PFCs and SF₆ from burning fossil fuels were the gases included in the calculation.

c. Biogenic CO₂ emissions in metric tons of CO₂ equivalent.

No data available as biogenic CO₂ emissions are not relevant in our business model.

d. Base year for the calculation, if applicable, including:

- i. *the rationale for choosing it;*
- ii. *emissions in the base year;*
- iii. *the context for any significant changes in emissions that triggered recalculations of base year emissions.*

2021, as it is the first year of strategic sustainability reporting.

e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.

The sources of the emission factors are as following:

Subcategory	kg CO ₂ E	per unit	Source
Natural gas	0.18385	kWh	UK Government GHG Conversion Factors for Company Reporting 2019
Heating oil	3.17966	Liter	UK Government GHG Conversion Factors for Company Reporting 2019
Diesel	2.59411	Liter	UK Government GHG Conversion Factors for Company Reporting 2019
Electricity, Germany	0.33866	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Electricity, Poland	0.75962	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Electricity, Estonia	0.59869	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Electricity, UK	0.23112	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf

Electricity, Turkey	0.375	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Electricity, Czech Republic	0.49549	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Electricity, Sweden	0.00567	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Electricity, south Africa	0.9006	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Electricity, USA	0.37313	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Electricity, Netherlands	0.37434	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Electricity, Brasil	0.0617	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Electricity, Spain	0.17103	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Electricity, Italy	0.32384	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
Lpg / propane	1.5226	Liter	UK Government GHG Conversion Factors for Company Reporting 2019

f. Consolidation approach for emissions; whether equity share, financial control, or operational control.

We used financial control for the consolidation approach.

The scope of consolidation for emissions includes the operating sites. These sites are under operational control.

g. Standards, methodologies, assumptions, and/or calculation tools used.

To collect the information, consumption data was obtained from the sites and determined by different factors. The internal calculation was based on the GHG Protocol. No external verification took place by GHG expert.

Disclosure 305-2: Energy indirect (Scope 2) GHG emissions

a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.

Corporation	Scope 2 GHG emissions (in mt)
Total	6,724.67
Cronifer UK Ltd.	15.37
CRONIMET (Great Britain) Ltd.	45.47
CRONIMET (Holland) b.v.	272.59
CRONIMET RSA (PTY) Ltd.	326.94
CRONIMET ALFA Ferrolegierungen Handels GmbH	6.95
CRONIMET Brasil Ltda.	26.81
CRONIMET Holdings, Inc.	2,479.16
Metall Service Pedack GmbH	10.08
CRONIMET Envirotec GmbH	604.48
CRONIMET Fagersta AB	5.01
CRONIMET Ferroleg. GmbH + CRONIMET Holding GmbH + CRONIMET Raw Materials GmbH	509.36
CRONIMET HISPANIA, S. A.	19.74
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	196.87
CRONIMET Nordic OÜ	213.95
CR PL Sp. z.o.o. (Poland)	57.85
CRONIMET Noble Alloys Handelsgesellschaft mbH	1,176.72
CRONIMET Turkey Metal Ticaret A.S.	30.07
ERG Edelstahl Recycling GmbH	10.19
Metalloy Metalle-Legierungen GmbH	50.43
Nichel Leghe SpA	100.77

b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.

There are no data available for the market-based approach or could not be provided by the energy suppliers, so we used the location-based approach.

c. If available, the gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.

CO2, CH4, N2O, HFCs, PFCs and SF6 from burning fossil fuels were the gases included in the calculation.

d. Base year for the calculation, if applicable, including:

- i. *the rationale for choosing it;*
- ii. *emissions in the base year;*
- iii. *the context for any significant changes in emissions that triggered recalculations of base year emissions.*

2021, as it is the first year of strategic sustainability reporting.

e. Source of the emission factors and global warming potential (GWP) rates used, or a reference to the GWP source.

The sources of the emission factors are as following:

Subcategory	kg CO2E	per unit	Source
natural gas	0.18385	kWh	UK Government GHG Conversion Factors for Company Reporting 2019
heating oil	3.17966	Liter	UK Government GHG Conversion Factors for Company Reporting 2019
diesel	2.59411	Liter	UK Government GHG Conversion Factors for Company Reporting 2019
electricity, Germany	0.33866	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, Poland	0.75962	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, Estonia	0.59869	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, UK	0.23112	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, Turkey	0.375	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, Czech Republic	0.49549	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, Sweden	0.00567	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, south Africa	0.9006	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, USA	0.37313	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, Netherlands	0.37434	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, Brasil	0.0617	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, Spain	0.17103	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
electricity, Italy	0.32384	kWh	https://www.carbonfootprint.com/docs/2022_03_emissions_factors_sources_for_2021_electricity_v11.pdf
lpg / propane	1.5226	Liter	UK Government GHG Conversion Factors for Company Reporting 2019

f. Consolidation approach for emissions; whether equity share, financial control, or operational control.

We used financial control for the consolidation approach of the GHG Protocol.

The scope of consolidation for emissions includes the operating sites. These sites are under operational control.

g. Standards, methodologies, assumptions, and/or calculation tools used.

To collect the information, consumption data was obtained from the sites and determined by different factors. The internal calculation was based on the GHG Protocol. No external verification took place by GHG expert.

2. Waste Management

GRI 103: Management Approach 2016

Our environmental management system ensures the planning and implementation of our environmental targets. Waste management is one part of our environmental management system. Each subsidiary has a waste management officer who is responsible for the proper disposal of all waste generated in accordance with legal regulations. The responsible waste officer verifies the reliability of the disposal companies, preferably based on their current certificates or permits.

In general, the following non-hazardous waste is generated at our sites: wood, plastics, big bags, document shredding, styrofoam, glass, paper, food, cooking oil, concrete, and contaminated soil.

In general, the following hazardous waste is generated at our sites: acids, solid salts and solutions containing heavy metals, halogen-free cutting emulsions and solutions, non-chlorinated mineral-based machine gear and lubricating oils, sludges from oil/water separators, lead-acid batteries, and sludges from physicochemical treatment containing hazardous substances.

Due to the limited data available, the following disclosure regarding the material topic "Waste Management" applies exclusively to the following German sites of CRONIMET:

- *Metall Service Pedack GmbH*
- *CRONIMET Envirotec GmbH*
- *CRONIMET Ferroleg. GmbH*
- *CRONIMET Holding GmbH*
- *CRONIMET Legierungen Dortmund Handelsgesellschaft mbH*
- *CRONIMET Noble Alloys mbH*
- *ERG Edelstahl Recycling GmbH*
- *Metalloy Metalle-Legierungen GmbH*

GRI 306: Waste 2020

The part following below addresses the topic of waste. Waste can be generated in the organization's own activities, for example, during the production of its products and delivery of services. Waste can have significant negative impacts on the environment and human health when inadequately managed. These impacts often extend beyond locations where waste is generated and discarded. The resources and materials contained in waste that is incinerated or landfilled are lost to future use, which accelerates their depletion.

Disclosure 306-1: Waste generation and significant waste-related impacts

a. For the organization's significant actual and potential waste-related impacts, a description of:

- i. *the inputs, activities, and outputs that lead or could lead to these impacts;*

Waste generated during the operational activities of the scrapyards. For example the operating resources for our machines.

- Operating resources consumed (quantity)

- ii. *whether these impacts relate to waste generated in the organization's own activities or to waste generated upstream or downstream in its value chain.*

Only waste generated in the organization's own activities. No downstream and upstream waste was considered.

Disclosure 306-2: Management of significant waste-related impacts

a. Actions, including circularity measures, taken to prevent waste generation in the organization's own activities and upstream and downstream in its value chain, and to manage significant impacts from waste generated.

CRONIMET is certified to ISO 14001, 50001, 9001, 45001, End of Waste and the national regulation "Specialised Waste Management Company EfB-V". All actions and circularity measures taken to prevent waste generation in our own activities and upstream and downstream in its value chain, and to manage significant impacts from waste generated, emanate from the obligation within the systems.

An overview of the certifications:

	ISO 9001	ISO 14001	ISO 50001	ISO 45001	Specialised Waste Management Company EFB-V
CRONIMET CREMETAL	✓	✓			✓
CRONIMET Ferroleg. GmbH	✓	✓	✓	✓	✓
CRONIMET Raw Materials GmbH	✓	✓	-	✓	-
CRONIMET Dortmund GmbH	✓	✓		✓	✓
Metall Service Pedack	✓				
CRONIMET Envirotec GmbH	✓	✓	✓	✓	✓
Metalloy Metalle - Legierungen GmbH	✓	✓		✓	✓
ERG Edelstahl Recycling GmbH	✓	✓		✓	✓
CRONIMET Alfa Ferrolegierungen Handels-GmbH	✓				✓
CRONIMET (Holland) B.V.	✓	✓			
CRONIMET PL Sp	✓	✓		✓	
CRONIMET Ostrava sro	✓				
Nichel Leghe	✓	✓		✓	
CRONIMET Suisse AG	✓				
CRONIMET Raw Materials Suisse AG	✓				
CRONIMET Brasil Ltda.	✓	✓		□	
CRONIMET HISPANIA S.A	✓	✓			
CRONIMET Ltd. (Great-Britain)	✓	✓		✓	
CRONIMET Fagersta AB		✓			
CRONIMET Nordic OÜ	✓	✓			
CRONIMET Turkey		✓			
United Alloys & Metals, Inc.	✓				
CRONIMET Corporation	✓				
CRONIMET Specialty Metals USA	✓	✓		✓	

- b. If the waste generated by the organization in its own activities is managed by a third party, a description of the processes used to determine whether the third party manages the waste in line with contractual or legislative obligations.**

The respective waste management officer organizes transport and proper disposal of the waste generated. These processes are reviewed consistently. The carrier or the recycler regularly takes samples of the generated waste to check the quality. The recyclers are all certified according to the national regulation of the EfB-V. If necessary, external companies are contracted to take samples for waste in accordance with national regulations (e.g., LAGA PN 98, soil sampling).

Thus, the processes used to determine whether the third party manages the waste in line with contractual or legislative obligations are sampling and quality control of incoming waste.

- c. The processes used to collect and monitor waste-related data.**

The data is documented in a cloud-based electronic verification system by CRONIMET, the carrier and the recycler with date and quantity. This process is in accordance with the legal regulation according to the German law "Nachweisverordnung" for waste recovery and disposal. The waste generated is listed monthly and submitted to the EfB-officer for inspection. Once a year, a waste report is written that lists all important processes and quantities. It is signed by the management. This process applies to the hazardous waste produced.

Furthermore, there is non-hazardous waste (our actual business in trade), which is printed out in a register via SAP as a list depending on the waste code.

Disclosure 306-3: Waste generated

- a. Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste.**

Waste (GRI 306)		
Total	2,359.07	Total
Hazardous	1,165.75	(mt)
Non-hazardous	1,193.32	(mt)

- b. Contextual information necessary to understand the data and how the data has been compiled.**

The data was taken from the waste report prepared by each site-related and trained waste officer.

Disclosure 306-4: Waste diverted from disposal

- a. Total weight of waste diverted from disposal in metric tons, and a breakdown of this total by composition of the waste.

Corporation	Total weight of waste diverted from disposal
Total	1,689.404 mt Thereof: 506.384 mt hazardous waste 1,183.02 mt non-hazardous waste
Metall Service Pedack GmbH	41.5 mt hazardous 138.08 mt non-hazardous waste
CRONIMET Envirotec GmbH	339.279 mt hazardous 71.05 mt non-hazardous waste
CRONIMET Ferroleg. GmbH	101.68 mt hazardous 671.8 mt non-hazardous waste
CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit.
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	15.0 mt hazardous 202.25 mt non-hazardous waste
CRONIMET Noble Alloys mbH	0 mt hazardous 44.46 mt non-hazardous waste
ERG Edelstahl Recycling GmbH	0 mt hazardous 30.7 mt non-hazardous waste
Metalloy Metalle-Legierungen GmbH	8.925 mt hazardous 24.68 mt non-hazardous waste

- b. Total weight of hazardous waste diverted from disposal in metric tons, and a breakdown of this total by the following recovery operations:

Corporation	Total weight of hazardous waste diverted from disposal	i. thereof: Preparation for reuse	ii. thereof: Recycling	iii. thereof: Other recovery operations
Total	506.384	0	339.279	167.105
Metall Service Pedack GmbH	41.50	0	0	41.50
CRONIMET Envirotec GmbH	339.279	0	339.279	0
CRONIMET Ferroleg. GmbH	101.68	0	0	101.68
CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit.	/	/	/
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	15.00	0	0	15.00
CRONIMET Noble Alloys mbH	0	0	0	0
ERG Edelstahl Recycling GmbH	0	0	0	0
Metalloy Metalle-Legierungen GmbH	8.925	0	0	8.925

- c. Total weight of non-hazardous waste diverted from disposal in metric tons, and a breakdown of this total by the following recovery operations:

Corporation	Total weight of non-hazardous waste diverted from disposal	i. thereof: Preparation for reuse	ii. thereof: Recycling	iii. thereof: Other recovery operations
Total	1,183.02	0	0	1,183.02
Metall Service Pedack GmbH	138.08	0	0	138.08
CRONIMET Envirotec GmbH	71.05	0	0	71.05
CRONIMET Ferroleg. GmbH	671.8	0	0	671.8

CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit.	/	/	/
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	202.25	0	0	202.25
CRONIMET Noble Alloys mbH	44.46	0	0	44.46
ERG Edelstahl Recycling GmbH	30.7	0	0	30.7
Metalloy Metalle-Legierungen GmbH	24.68	0	0	24.68

d. For each recovery operation listed in Disclosures 306-4-b and 306-4-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste diverted from disposal:

i. onsite;

There is no onsite recovery operation. All recovery operations takes place offsite. For this reason, no division into onsite and offsite can be made.

ii. offsite.

Other recovery options are energetic recovery as well as feed stock recycling, offsite. These options diverted 172.08 mt hazardous and 1,183.02 mt non-hazardous waste from disposal.

A breakdown in metric tons for each recovery operation is not possible as the data is not available.

e. Contextual information necessary to understand the data and how the data has been compiled.

The data was taken from the waste report prepared by each site-related and trained waste officer.

Disclosure 306-5: Waste directed to disposal

- a. Total weight of waste directed to disposal in metric tons, and a breakdown of this total by composition of the waste.

Corporation	Total weight of waste directed to disposal
Total	664.691 mt Thereof: 654.391 mt hazardous waste 10.3 mt non-hazardous waste
Metall Service Pedack GmbH	1.1 mt hazardous 0 mt non-hazardous waste
CRONIMET Envirotec GmbH	502.531 mt hazardous 10.3 mt non-hazardous waste
CRONIMET Ferroleg. GmbH	3.92 mt hazardous, 0 mt non-hazardous waste
CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	45.608 mt hazardous 0 mt non-hazardous waste
CRONIMET Noble Alloys mbH	0.58 mt hazardous 0 mt non-hazardous waste
ERG Edelstahl Recycling GmbH	55.05 mt hazardous 0 mt non-hazardous waste
Metalloy Metalle-Legierungen GmbH	45.61 mt hazardous 0 mt non hazardous

- b. Total weight of hazardous waste directed to disposal in metric tons, and a breakdown of this total by the following disposal operations:

Corporation	Total weight of hazardous wasted directed to disposal	<i>i. thereof Incineration (with energy recovery)</i>	<i>ii. thereof Incineration (without energy recovery)</i>	<i>iii. thereof Landfilling</i>	<i>iv. Other disposal operations</i>
Total	654.391	48.76	5.02	0	600.611
Metall Service Pedack GmbH	1.1	0	1.1	0	0
CRONIMET Envirotec GmbH	502.531	0	0	0	502.531
CRONIMET Ferroleg. GmbH	3.92	0	3.92	0	0
CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit.	/	/	/	/

CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	45,6	1,1	0	0	44,5
CRONIMET Noble Alloys mbH	0.58	0.58	0	0	0
ERG Edelstahl Recycling GmbH	55.05	1.47	0	0	53.58
Metalloy Metalle-Legierungen GmbH	45.61	45.61	0	0	0

- c. Total weight of non-hazardous waste directed to disposal in metric tons, and a breakdown of this total by the following disposal operations:

Corporation	Total weight of non-hazardous wasted directed to disposal	<i>i. thereof Incineration (with energy recovery)</i>	<i>ii. thereof Incineration (without energy recovery)</i>	<i>iii. thereof Landfilling</i>	<i>iv. Other disposal operations</i>
Total	10.3	0	0	10.3	0
Metall Service Pedack GmbH	0	0	0	0	0
CRONIMET Envirotec GmbH	10.3	0	0	10.3	0
CRONIMET Ferroleg. GmbH	0	0	0	0	0
CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit.	/	/	/	/
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	0	0	0	0	0
CRONIMET Noble Alloys mbH	0	0	0	0	0
ERG Edelstahl Recycling GmbH	0	0	0	0	0
Metalloy Metalle-Legierungen GmbH	0	0	0	0	0

d. For each disposal operation listed in Disclosures 306-5-b and 306-5-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste directed to disposal:

i. onsite;

There are no onsite disposal operations, so no data is available.

ii. offsite.

Treatment for elimination of 502.531 mt hazardous waste, offsite.

e. Contextual information necessary to understand the data and how the data has been compiled.

The data was taken from the waste report prepared by each site-related and trained waste officer.

3. Sustainability of Trading Goods and Services

GRI 103: Management Approach 2016

CRONIMET recycles metallic materials – without any loss of quality. The term “metallic materials” includes all of our products listed under disclosure 102-7. We return scrap to the material cycle, thus conserving resources and making an important contribution to securing raw materials and protecting the climate. To do this, we use our know-how and the experience of our employees, and modern technology. The scrap is generated in manufacturing processes or is used by consumers and disposed of at the end of its life cycle. But: The material is not waste for us but becomes a valuable raw material. CRONIMET buys the scrap via a worldwide network of traders, analyzes, sorts, and processes it. As a secondary raw material, i.e., recycled raw material, we return it to the cycle. Our products – mixtures of materials specially formulated to customer specifications – are processed directly by manufacturing companies and used in a wide range of sectors and industries, including the automotive, aerospace, and medical technology industries. At the end of their service life, they return to us, are recycled and are available again as raw materials.

The following disclosure includes the data of those locations that are material to our operating result and / or our long-term strategy to the extent all relevant data are available – except representative offices, commercial agencies, joint ventures in which we do not have a majority stake, or subsidiaries that are up for sale.

GRI 301: Materials 2016

The part following below addresses the topic of materials. The inputs used to manufacture and package an organization's products and services can be non-renewable materials, such as minerals, metals, oil, gas, or coal; or renewable materials, such as wood or water. Both renewable and non-renewable materials can be composed of virgin or recycled input materials. The type and amount of materials the organization uses can indicate its dependence on natural resources, and the impacts it has on their availability. The organization's contribution to resource conservation can be indicated by its approach to recycling, reusing and reclaiming materials, products, and packaging.

Disclosure 301-1: Materials used by weight or volume

a. Total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by:

i. non-renewable materials used;

Primary raw materials with a amount of 38,669 tons in 2021. These include mostly ferro-chromium, ferro-nickel and pure nickel in the form of granules, cathodes, pellets and powder.

ii. renewable materials used.

Secondary raw materials (scrap):

Stainless:	1,570,114 tons
Specialty Metals area	49,522 tons
Total:	1,619,636 tons

Disclosure 301-2: Recycled input materials used

a. Percentage of recycled input materials used to manufacture the organization's primary products and services.

Primary raw materials for blending/alloying amount to **38,669 tons** in 2021.

Secondary raw materials:

Stainless:	1,570,114 tons
+ Specialty Metals area	49,522 tons
= Total:	1,619,636 tons

⇒ This results in a ratio of **97.67%**.

Disclosure 301-3: Reclaimed products and their packaging materials**a. Percentage of reclaimed products and their packaging materials for each product category.**

Percentage of reclaimed products and their packaging materials is 100%.

Because of our business model, we trade with scrap metal. This product already reclaimed.

There is no packaging material as the products are transported in freight cars and/or containers.

b. How the data for this disclosure have been collected.

With the help of our general SAP management system, we can determine the data from the material flows.

Social

Recruitment and Retention

Occupational Health and Safety

Training and Development

Diversity and Equal Opportunities

Philanthropic Activities / Contributions

Responsibility in the Supply Chain

B. Social

1. Recruitment and Retention (including Work-Life Balance)

GRI 103: Management Approach 2016

The topic is substantial in all parts and at all levels of the company, as people work together everywhere.

Our aspiration is to recruit the best possible employees in terms of qualification and personality. When selecting applicants, we pay attention to their personal fit to the company. Technical deficits can be compensated through training, while personal ones are difficult to change. Identification with our corporate values is an important prerequisite for working successfully at CRONIMET in the long term. If we manage to find the qualified employees and bind them to us, Human Resource Management has made a major contribution to the company's success

We use the management tool "employee survey" to receive feedback whether we are on the right track towards achieving our goals (e.g., strategic goals for 2025). This is flanked by the annual employee appraisals, the personal development appraisal and management feedback. We regularly carry out internal and external benchmarks to check whether the general conditions are still suitable for our employees. As a result, there is a constant improvement in employee benefits and work-life balance.

As for the material topic only the reported data referring to the German corporations are available, we opted for these defining the 'significant locations of operation'.

Due to the limited data available, the following disclosure regarding the material topic "Recruitment and Retention (including work-life balance)" applies exclusively to the following German sites of CRONIMET:

- CRONIMET Envirotec GmbH
- CRONIMET Ferroleg. GmbH
- CRONIMET Holding GmbH
- CRONIMET Legierungen Dortmund Handelsgesellschaft mbH
- CRONIMET Raw Materials GmbH
- ERG Edelstahl Recycling GmbH
- Metall Service Pedack GmbH

GRI 401: Employment 2016

The part following below addresses the topic of employment. This includes an organization's approach to employment or job creation, that is, an organization's approach to hiring, recruitment, retention and related practices, and the working conditions it provides. This topic also covers the employment and working conditions in an organization's supply chain. An employment relationship is a legal relationship between a worker and an organization that confers rights and obligations to both parties. This relationship is usually the means for determining whether employment or labor law is applicable or whether commercial law is applicable.

Disclosure 401-1: New employee hires and employee turnover

a. Total number and rate of new employee hires during the reporting period, by age group, and gender.

Total number of employee hires in 2021:

Corporation	Total number of employee hires 2021
Total	57
CRONIMET Envirotec GmbH	9
CRONIMET Ferroleg. GmbH	16
CRONIMET Holding GmbH	18
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	1
CRONIMET Raw Materials GmbH	4
ERG Edelstahl Recycling GmbH	4
Metall Service Pedack GmbH	5

By age group:

Corporation	Under 30 years old (%)	30-50 years old (%)	Over 50 years old (%)
CRONIMET Envirotec GmbH	55.56 %	44.44 %	0 %
CRONIMET Ferroleg. GmbH	50 %	37.50 %	12.50 %
CRONIMET Holding GmbH	38.89 %	38,89 %	22.22 %
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	100 %	0 %	0 %
CRONIMET Raw Materials GmbH	50 %	25 %	25 %
ERG Edelstahl Recycling GmbH	25 %	75 %	0 %
Metall Service Pedack GmbH	40 %	60 %	0 %

By gender:

Corporation	Female Employees hired (%)	Male Employees hired (%)
CRONIMET Envirotec GmbH	33.33 %	66.67 %
CRONIMET Ferroleg. GmbH	18.75 %	81.25 %
CRONIMET Holding GmbH	33.33 %	66.67 %
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	0 %	100 %
CRONIMET Raw Materials GmbH	50 %	50%
ERG Edelstahl Recycling GmbH	0 %	100 %
Metall Service Pedack GmbH	40 %	60 %

b. Total number and rate of employee turnover during the reporting period, by age group, gender and region.

Total number of employee turnover in 2021:

Corporation	Total number of employee turnover 2021
Total	43
CRONIMET Envirotec GmbH	5
CRONIMET Ferroleg. GmbH	16
CRONIMET Holding GmbH	10
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	2
CRONIMET Raw Materials GmbH	1
ERG Edelstahl Recycling GmbH	3
Metall Service Pedack GmbH	6

By age group:

Corporation	Under 30 years old (%)	30-50 years old (%)	Over 50 years old (%)
CRONIMET Envirotec GmbH	60 %	40 %	0 %
CRONIMET Ferroleg. GmbH	62.50 %	18.75 %	18.75 %
CRONIMET Holding GmbH	40 %	20 %	40 %
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	0 %	50 %	50 %
CRONIMET Raw Materials GmbH	0 %	0 %	100 %
ERG Edelstahl Recycling GmbH	100 %	0 %	0 %
Metall Service Pedack GmbH	50 %	50 %	0 %

By gender:

Corporation	Female Employees off (%)	Male Employees off (%)
CRONIMET Envirotec GmbH	40 %	60 %
CRONIMET Ferroleg. GmbH	0 %	100 %
CRONIMET Holding GmbH	20 %	80 %
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	50 %	50 %
CRONIMET Raw Materials GmbH	0 %	100%
ERG Edelstahl Recycling GmbH	33.33 %	66.67 %
Metall Service Pedack GmbH	0 %	100 %

Disclosure 401-2: Benefits provided to full-time employees that are not provided to temporary or part-time employees

As in the case of employee bonuses and voluntary benefits, either the monthly salary or the working hours of an employee is taken into account when determining the amount of the benefit, the benefits are provided for both full-time and temporary or part-time employees.

a. Benefits which are standard for full-time employees of the organization but are not provided to temporary or part-time employees, by significant locations of operation. These include, as a minimum:

i. life insurance;

Life insurance is not offered as a corporate benefit.

ii. health care;

Benefit	Corporation
Simplified access to a occupational disability insurance special conditions	CRONIMET Holding GmbH, CRONIMET Ferroleg. GmbH, CRONIMET Raw Materials GmbH

iii. *disability and invalidity coverage;*

Benefit	Corporation
Simplified access to a occupational disability insurance special conditions	CRONIMET Holding GmbH, CRONIMET Ferroleg. GmbH, CRONIMET Raw Materials GmbH
Employer-funded group accident insurance	CRONIMET Holding GmbH, CRONIMET Ferroleg. GmbH, CRONIMET Raw Materials GmbH, CRONIMET Envirotec GmbH, CRONIMET Legierungen Dortmund Handelsgesellschaft mbH, ERG Edelstahl Recycling GmbH, CRONIMET Metall Service Pedack GmbH

iv. *parental leave;*

The regulations on parental leave are based on the statutory requirements.

v. *retirement provision;*

Benefit	Corporation
Promotion of the company pension plan after two years of service (Additional payment by the employer of employer of 2/3 max. 100 € per month)	CRONIMET Holding GmbH, CRONIMET Ferroleg. GmbH, CRONIMET Raw Materials GmbH, CRONIMET Envirotec GmbH, ERG Edelstahl Recycling GmbH, CRONIMET Legierungen Dortmund Handelsgesellschaft mbH
Basic pension amount 33.87 € after the Probationary period financed by the employer	CRONIMET Holding GmbH, CRONIMET Ferroleg. GmbH, CRONIMET Raw Materials GmbH, CRONIMET Envirotec GmbH, Metall Service Pedack GmbH

vi. *stock ownership;*

Stock ownership is not offered as a corporate benefit.

vii. others.

Benefit	Corporation
Capital-forming benefits are Subsidized	CRONIMET Legierungen Dortmund Handelsgesellschaft mbH, ERG Edelstahl Recycling GmbH
Co-payment for places in a kindergarden, 50 % up to maximum 300 €	CRONIMET Holding GmbH, CRONIMET Ferroleg. GmbH, CRONIMET Raw Materials GmbH, CRONIMET Legierungen Dortmund Handelsgesellschaft mbH, CRONIMET Envirotec GmbH, ERG Edelstahl Recycling GmbH
200 euros net for marriage and birth	CRONIMET Holding GmbH, CRONIMET Ferroleg. GmbH, CRONIMET Raw Materials GmbH
Special payment for company anniversary (from 10 years on in 5-year increments, 40 € per year, at 25 years a full salary)	CRONIMET Holding GmbH, CRONIMET Ferroleg. GmbH, CRONIMET Raw Materials GmbH, CRONIMET Legierungen Dortmund Handelsgesellschaft mbH, ERG Edelstahl Recycling GmbH
Discounted gym memberships	CRONIMET Holding GmbH, CRONIMET Ferroleg. GmbH, CRONIMET Raw Materials GmbH

Disclosure 401-3: Parental leave

Total number of employees that were entitled to parental leave, by gender.

a. All employees are entitled to parental leave.

Corporation	Total number of employee that took parental leave in 2021
Total	17 (female: 7, male: 10)
CRONIMET Envirotec GmbH	1 (male)
CRONIMET Ferroleg. GmbH	9 (5 male, 4 female)
CRONIMET Holding GmbH	6 (3 male, 3 female)
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	1 (male)
CRONIMET Raw Materials GmbH	0
ERG Edelstahl Recycling GmbH	0
Metall Service Pedack GmbH	0

b. Total number of employees that took parental leave, by gender.

Corporation	Total number of employee that took parental leave in 2021
Total	17 (female: 7, male: 10)
CRONIMET Envirotec GmbH	1 (male)
CRONIMET Ferroleg. GmbH	9 (5 male, 4 female)
CRONIMET Holding GmbH	6 (3 male, 3 female)
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	1 (male)
CRONIMET Raw Materials GmbH	0
ERG Edelstahl Recycling GmbH	0
Metall Service Pedack GmbH	0

c. Total number of employees that returned to work in the reporting period after parental leave ended, by gender.

Corporation	Total number of employees who returned after parental leave in 2021
Total	11 (female: 1, male: 10)
CRONIMET Envirotec GmbH	1 (male)
CRONIMET Ferroleg. GmbH	5 (male)
CRONIMET Holding GmbH	4 (3 male, 1 female)
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	1 (male)
CRONIMET Raw Materials GmbH	0
ERG Edelstahl Recycling GmbH	0
Metall Service Pedack GmbH	0

d. Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender.

Corporation	Number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work
Total	51 (female: 29, male: 22)
CRONIMET Envirotec GmbH	3 (2 male, 1 female)
CRONIMET Ferroleg. GmbH	22 (12 male, 10 female)
CRONIMET Holding GmbH	20 (7 male, 13 female)
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	1 (male)
CRONIMET Raw Materials GmbH	1 (female)
ERG Edelstahl Recycling GmbH	1 (female)
Metall Service Pedack GmbH	3 (female)

e. Return to work and retention rates of employees that took parental leave, by gender

Corporation	Return to work rate	Retention rate
Total	11 (female: 1, male: 10), return after parental leave was agreed upon with every employee	
CRONIMET Envirotec GmbH	100% male/ - female	-
CRONIMET Ferroleg. GmbH	100% male / - female	-
CRONIMET Holding GmbH	100% male, 100% female	-
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	100% male / - female	-
CRONIMET Raw Materials GmbH	-	-
ERG Edelstahl Recycling GmbH	-	-
Metall Service Pedack GmbH	-	-

Due to the first GRI report there are no data available from previous periods to calculate the retention rate.

2. Occupational Health and Safety

GRI 103: Management Approach 2016

Our occupational health and safety processes and standards are aligned with the international standard ISO 45001. An overview of the certificates can be found under disclosure 306-2.

Systematic occupational safety includes regularly assessing hazards and monitoring work areas.

All employees are instructed in safety topics for their individual workplace, e.g., with the help of e-learning and safety training. The knowledge imparted ranges from general safety instructions for warehouse or laboratory employees to the classification of hazardous substances. Success checks are integrated into the learning units.

The active pursuit of the Occupational Health and Safety (OHS) policy is the task of every employee. We live an OHS culture built on the following eight pillars:

- 1)** Occupational health and safety is the responsibility of the executive management, superiors, and employees. All work equally responsibly on the daily implementation.
- 2)** Top management, managers and employees know, accept and support the OHS policy and objectives.
- 3)** Compliance with labor law and other requirements is mandatory for us.

- 4) Our employees are regularly sensitized to the topic of occupational health and safety and receive further training within the framework of instructions, meetings, training courses, workshops and notices.
- 5) We systematically identify existing hazards and risks – but also opportunities. On this basis, we derive objectives and define protective measures. In this way, we continuously improve our OHS performance and eliminate dangers and risks.
- 6) When implementing OHS actions, we are guided by the latest findings and the state of the art for designing working conditions that are as safe, health-promoting and low-risk as possible. The focus of our commitment is on the prevention of work-related injuries and illnesses.
- 7) We communicate our occupational health and safety activities proactively to our employees and other interested stakeholders. We have installed processes through which our employees are regularly consulted, questioned and involved in decisions and analyses. We only engage subcontractors and third-party service providers on the condition that the requirements of our OHS policy are adhered to and implemented.
- 8) We maintain a regular dialog with authorities, the statutory accident insurance, occupational physicians, occupational safety specialists, our contractual partners and customers for joint responsible implementation at all levels in all areas of our company.

Due to the limited data available, the following disclosure regarding the material topic “Occupational Health and Safety” applies exclusively to the following sites of CRONIMET:

- | | |
|---|--------------------------------------|
| • Cronifer UK Ltd. | • CRONIMET PL Sp. z.o.o. (Poland) |
| • CRONIMET (Great Britain) Ltd. | • CRONIMET Raw Materials GmbH |
| • CRONIMET ALFA Ferrolegierungen Handels GmbH | • CRONIMET Raw Materials Suisse AG |
| • CRONIMET Asia Pte. Ltd. | • CRONIMET RSA (PTY) Ltd. |
| • CRONIMET Brasil Ltda. | • CRONIMET S.A. (Lugano) |
| • CRONIMET Envirotec GmbH | • CRONIMET Services GmbH |
| • CRONIMET Fagersta AB | • CRONIMET Shanghai Co., Ltd |
| • CRONIMET Ferroleg. GmbH | • CRONIMET Singapore Pte. Ltd. |
| • CRONIMET France SAS | • CRONIMET Turkey Metal Ticaret A.S. |
| • CRONIMET Hispania, S.A. | • ERG Edelstahl Recycling GmbH |
| • CRONIMET Holding GmbH | • Metall Service Pedack GmbH |
| • CRONIMET Holdings, Inc. | • Metalloy Metalle-Legierungen GmbH |
| • CRONIMET Holland b.v. | • Nichel Leghe SpA |
| • CRONIMET Legierungen Dortmund Handelsgesellschaft mbH | |
| • CRONIMET Noble Alloys Handelsgesellschaft mbH | |
| • CRONIMET Nordic OÜ | |

The consolidation scope is being continuously expanded.

GRI 403: Occupational Health and Safety 2018

The part following below addresses the topic of occupational health and safety. Healthy and safe work conditions are recognized as a human right and addressed in authoritative intergovernmental instruments, including those of the International Labour Organization (ILO), the Organisation for Economic Co-operation and Development (OECD), and the World Health Organization (WHO). Healthy and safe work conditions involve both prevention of physical and mental harm, and promotion of workers' health. Prevention of harm and promotion of health require an organization to demonstrate commitment to workers' health and safety. They also require the organization to engage workers in the development, implementation, and performance evaluation of an occupational health and safety policy, management system and programs that are appropriate to the organization's size and activities. It is essential that workers are consulted in the development of an organization's occupational health and safety policy, and participate in the processes necessary to plan, support, operate, and continually evaluate the effectiveness of the occupational health and safety management system and programs. Hazard identification and risk assessment, worker training, and incident identification and investigation are also key to planning, supporting, operating, and evaluating the occupational health and safety management system. In addition to preventing harm, an organization can promote workers' health by offering healthcare services or voluntary health promotion services and programs, which, for example, help workers improve their diet or quit smoking. These additional services and programs cannot serve as a substitute for occupational health and safety programs, services and systems that prevent harm and protect workers from work-related injuries.

Disclosure 403-1: Occupational health and safety management system

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

a. A statement of whether an occupational health and safety management system has been implemented, including whether:

- i. the system has been implemented because of legal requirements and, if so, a list of the requirements;*

An occupational health and safety management system has been implemented. An overview is listed in the management approach. That was not due to legal requirements, but instead because the management considers this issue to be material and is therefore committed to the implementation of a health and safety management system.

Maintaining and continuously improving occupational health and safety in compliance with all relevant, current legal standards are among our top objectives. We recognize that the safety and health of our employees make a vital contribution to the profitability of our company. In order to ensure a continuous improvement process, the occupational health and safety is an integral part of our management system. The resources required for occupational health and safety are adequately taken into account in the annual business planning. Our employees develop an awareness of occupational health and safety and integrate this into their everyday work. They take responsibility for their own actions and thus actively contribute to preventing accidents, illnesses and mutual hazards in the workplace.

- ii. *the system has been implemented based on recognized risk management and/or management system standards/guidelines and, if so, a list of the standards/guidelines.*

The following standards/guidelines are applied:

- ISO 45001 SGA
- ISO 9001
- ISO 14001
- ISO 50001

Not all locations have all four ISO certifications. An overview of the certificates can be found under disclosure 306-2.

Disclosure 403-2: Hazard identification, risk assessment and incident investigation

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. **A description of the processes used to identify work-related hazards and assess risks on a routine and non-routine basis, and to apply the hierarchy of controls in order to eliminate hazards and minimize risks, including:**

- i. *how the organization ensures the quality of these processes, including the competency of persons who carry them out;*

According to our Integrated Management Manual, it is ensured that sufficient personnel with the necessary expertise is available in order to meet product requirements as well as legal and regulatory requirements. In particular, the limited working capacity of the personnel and the existing qualifications are taken into account here. The effectiveness of the IMS is determined by the employees. Optimal training planning and motivation of employees to develop further ensures that all work and its results meet the specified requirements. At the same time, training serves as a strategic tool to achieve optimal use of human resources and organizational and technical possibilities. This encourages thinking, behavior and awareness to constantly improve, protect the environment and contribute to working safely. The training and qualification as well as the support and motivation of all employees occupy a central position in the company culture and require constant dialog between the employees and their superiors. In concrete terms, this means that

- for each workplace, employees and managers are trained according to their job / function;
- the knowledge of employees and managers is always kept up to date;
- the employees and managers are prepared for future tasks;

- employees and managers are informed about the actions and objectives of the IMS at least once a year or as required and made aware of the potential influence in their daily work.
- Training by the FaSi (Fachkraft für Arbeitssicherheit)

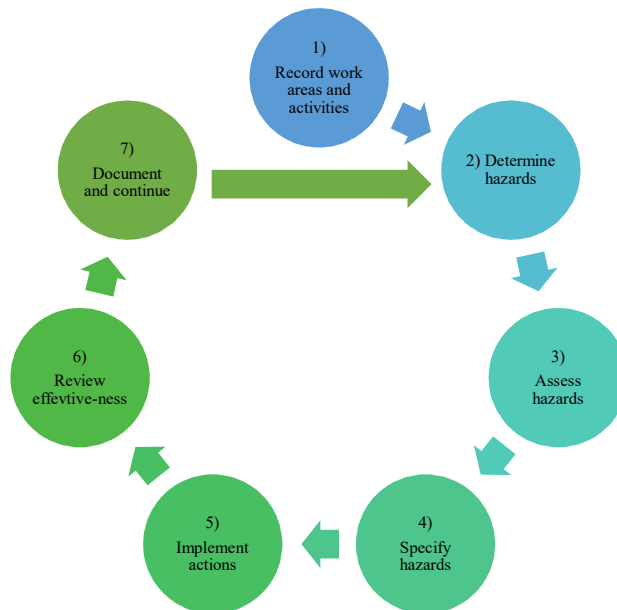
The direct superiors are responsible for the further training of the employees and the maintenance of the qualification in cooperation with the personnel development.

CRONIMET offers employees a training course to qualify as a safety officer and gives operating and working instructions. Regular briefings are held by supervisors and occupational safety specialists to raise awareness of hazards and risks and thus prevent them. In addition, the following meetings are held to discuss issues relevant to occupational safety:

- Quarter: Meeting with BUM
- Quarterly: ASA meetings (committee for occupational safety)
- Weekly: Warehouse management meetings
- Annually and if requested: hazard assessment

The hazard assessment process is an integral part of the integrated management system according to Section 5 German Occupational Safety and Health Act and further legal requirements. The determination of hazards and stresses takes place in the form of systematic observation of predefined or delimited workplaces or activities. In the case of similar working conditions, the assessment of a representative workplace or activity is sufficient. The workplaces and activities are compared with possible hazard and stress factors and reviewed for relevance. If the respective hazard factor is identified as applicable to the workplace or activity under consideration, an assessment is made to decide to what extent the stress or hazard is tolerable, taking into account any protective measures already taken or whether other or further actions must be initiated. Primarily compliance with legal requirements and the state of the art are used as evaluation criteria. Any actions that may be necessary must be specified and reviewed for their effectiveness.

The scheme from our Integrated Management Manual shows the basic procedure of a hazard assessment:



- ii. *how the results of these processes are used to evaluate and continually improve the occupational health and safety management system.*

The results of these processes are discussed with the HR department in monthly "safety calls" and quarterly ASA meetings (committee for occupational safety). In addition, a review is conducted with the management.

Based on the identified weaknesses or the cases that have occurred, measures are jointly developed and implemented to ensure continuous improvement.

b. A description of the processes for workers to report work-related hazards and hazardous situations, and an explanation of how workers are protected against reprisals.

Employees have the option of submitting a report form that draws attention to a "near miss"/ "almost-accident" and includes a potential evaluation. To be protected from reprisals, there is an internal anonymous reporting system. It is important to uncover, process and eliminate illegal or non-compliant behavior within CRONIMET. The web-based whistleblowing system enables all employees worldwide to report misconduct anonymously, fairly and transparently.

In particular, employees can report incidents of criminal and damaging activities, such as bribery or corruption, embezzlement, fraud against the company or its customers and suppliers, theft of company property, and violations of anti-trust law or environmental regulations. It is also possible to submit information that relates to conduct and actions that are directed against the CRONIMET values.

- c. **A description of the policies and processes for workers to remove themselves from work situations that they believe could cause injury or ill health, and an explanation of how workers are protected against reprisals.**

Employees can send a report to the works council, the occupational safety specialist or the safety officer. For this purpose, there is a form for "near miss reports" that can be used by employees at any time. To be protected from reprisals, there is an internal anonymous reporting system (see Disclosure 403-2-b).

- d. **A description of the processes used to investigate work-related incidents, including the processes to identify hazards and assess risks relating to the incidents, to determine corrective actions using the hierarchy of controls, and to determine improvements needed in the occupational health and safety management system.**

A risk assessment with control function takes place at regular intervals: The effectiveness of the protective measures taken (e.g., technical equipment, organizational procedures, training) is checked and documented annually. Success / effectiveness checks of the protective measures taken are also carried out and followed up on request, e.g., due to changes in equipment or work procedures.

The evaluation of the accident reports as well as the OSC (Occupational Safety Committee) protocols can also be used to derive action requirements or are already included in the reports and protocols. In this context, reference can also be made to the hazard assessment process explained above.

The software tool roXtra helps us in our task management.

Disclosure 403-3: Occupational health services

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. **A description of the occupational health services' functions that contribute to the identification and elimination of hazards and minimization of risks, and an explanation of how the organization ensures the quality of these services and facilitates workers' access to them.**

There is a contract with a company doctor. All employees are medically examined and actively encouraged to participate by our HR department. On top of that, health days are organized.

This service is offered at all German sites.

Disclosure 403-4: Worker participation, consultation and communication on occupational health and safety

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. A description of the processes for worker participation and consultation in the development, implementation, and evaluation of the occupational health and safety management system, and for providing access to and communicating relevant information on occupational health and safety to workers.**

Workers are given the opportunity to express their views on health and safety at works meetings and thus achieve active participation. The works council can be contacted at any time. In addition to participation, a wide range of information is available in the form of notice boards, dashboards or the software tool DMS roXtra. Weekly warehouse meetings are also an integral part of information sharing and participation.

- b. Where formal joint management-worker health and safety committees exist, a description of their responsibilities, meeting frequency, decision-making authority, and whether and, if so, why any workers are not represented by these committees.**

The committee for occupational safety meets quarterly with the company physician, the general management (plant/yard), the safety officer, the occupational health, safety practitioner and Human Resources. Thus, all workers are represented by the committee for occupational safety. A decision-making authority is available through the management.

Disclosure 403-5: Worker training on occupational health and safety

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. A description of any occupational health and safety training provided to workers, including generic training as well as training on specific work-related hazards, hazardous activities, or hazardous situations.**

Please note that we can only comment on the supervision times of the occupational safety specialist for the following German sites. All of these relate to the year 2021.

Occupational health and safety training includes information about occupational illnesses or accidents that can occur as part of typical work activities. It is shown how these illnesses/accidents can be caused, how they are recognized and which measures should be observed in order to avoid these illnesses/accidents. In addition, it also shows how to behave in the event of an accident and what steps to take.

The safety-related regular support by the specialist for occupational safety took place in 2021 within the scope of the operating times specified according to DGUV V2 (German Statutory Accident Insurance Regulation):

Basic supervision of the following Corporations:

CRONIMET Ferroleg. GmbH	135 employees x 1.5 h x 0.8	162 h / year
CRONIMET Holding GmbH	104 employees x 0.5 h x 0.8	41.6 h / year
CRONIMET Raw Materials GmbH	11 employees x 0.5 h x 0.8	4.4 h / year

Total of company-specific supervision of CRONIMET Ferroleg. GmbH, CRONIMET Holding GmbH and CRONIMET Raw Materials GmbH:

Determination according to appendix 4 DGUV V2	25 h / year
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CRONIMET Envirotec GmbH

Basic supervision	21 employees x 1.5 h x 0.8	25.2 h / year
Company-specific supervision	Determination according to appendix 4 DGUV V2	5 h / year

CRONIMET Legierungen Dortmund GmbH

Basic supervision	45 employees x 1.5 h x 0.8	54 h / year
Company-specific supervision	Determination according to appendix 4 DGUV V2	15 h / year

CRONIMET Noble Alloys Handelsgesellschaft mbH

Basic supervision	10 employees x 1.5 h	15 h / year
Event-related supervision		3 h / year

ERG Edelstahl Recycling GmbH

Basic supervision	23 employees x 1.5 h x 0.8	27.6 h / year
Company-specific supervision	Determination according to appendix 4 DGUV V2	5 h / year

Metalloy Metalle-Legierungen GmbH

Basic supervision	20 employees x 1.5 h x 0.8	24 h / year
Company-specific supervision	Determination according to appendix 4 DGUV V2	5 h / year

⇒ *Total of Basic supervision: 353.8 h / year*

⇒ *Total of Company-specific supervision and Event-related supervision: 58 h / year*

Disclosure 403-6: Promotion of worker health

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

a. An explanation of how the organization facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided.

CRONIMET offers its workers financial support for a gym membership. In addition, employees can be provided with a company bicycle. Full body workouts are also offered twice a week.

This service is offered at all German sites.

b. A description of any voluntary health promotion services and programs offered to workers to address major non-work-related health risks, including the specific health risks addressed, and how the organization facilitates workers' access to these services and programs.

CRONIMET offers its workers financial support for a gym membership. In addition, employees can be provided with a company bicycle. Full body workouts are also offered twice a week. External coaching referrals are also offered to workers.

Disclosure 403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

a. A description of the organization's approach to preventing or mitigating significant negative occupational health and safety impacts that are directly linked to its operations, products or services by its business relationships, and the related hazards and risks.

To ensure the health of all employees, the respective personal protective equipment is provided. The technology is regularly updated so that, for example, the excavators always have the best seats, air conditioning and filter systems.

CRONIMET also uses devices for lifting or moving of heavy weights where other equipment (e.g., forklifts due to space) are not usable. This is to relax employees from repetitive tasks and to avoid lifting & bending movements by using these devices to relieve/protect the spine and joints. Moreover, workplace ergonomics are taken into account in order to prevent health risks in office work as well.

Disclosure 403-8: Workers covered by an occupational health and safety management system

If a site does not have occupational health and safety certification, we cannot guarantee that the data is available from external workers. Therefore, we can only make a reliable statement about the certified sites listed in Disclosure 306-2.

a. If the organization has implemented an occupational health and safety management system based on legal requirements and/or recognized standards/guidelines:

- i. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system;*

451 employees (based on the certified sites)

The employees of the certified sites are 100% covered by such a system. Globally, 33% of our total employees are covered by such a system.

- ii. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been internally audited;*

451 employees (based on the certified sites)

The employees of the certified sites are 100% covered by such a system. Globally, 33% of our total employees are covered by such a system.

- iii. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been audited or certified by an external party.*

451 employees (based on the certified sites)

The employees of the certified sites are 100% covered by such a system. Globally, 33% of our total employees are covered by such a system.

b. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded.

No workers have been excluded from this disclosure, who works at a certified site.

- c. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

No contextual information necessary.

Disclosure 403-9: Work-related injuries

The reporting organization shall report the following information:

a. For all employees:

- i. *The number and rate of fatalities as a result of work-related injury;*

Zero
- ii. *The number and rate of high-consequence work-related injuries (excluding fatalities);*

Zero
- iii. *The number and rate of recordable work-related injuries;*
 - LTIFR: 2.33 (200,000 h)
 - Severity Rate: 19.8 (200,000 h)
- iv. *The main types of work-related injury;*
 - Bruises
 - Contusions
 - Cuts
- v. *The number of hours worked.*

2,576,378.48 hours

b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:

- i. *The number and rate of fatalities as a result of work-related injury;*

Zero
- ii. *The number and rate of high-consequence work-related injuries (excluding fatalities);*

Zero

iii. The number and rate of recordable work-related injuries;

In Poland, one of our workers, who is not an employee, was injured. As this accident was reported subsequently, we don't have any further data.

iv. The main types of work-related injury;

No details known for the main type of the work-related injury.

v. The number of hours worked.

63,577 hours

c. The work-related hazards that pose a risk of high-consequence injury, including:

- i. how these hazards have been determined;*
- ii. which of these hazards have caused or contributed to high-consequence injuries during the reporting period;*
- iii. actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls.*

No risk of high-consequence injury occurred.

d. Any actions taken or underway to eliminate other work-related hazards and minimize risks using the hierarchy of controls.

Contents of the safety-related regular support by a specialist for occupational safety:

- ASA sessions
- Factory inspections
- Safety briefing
- Evaluation of the accident
- Documentation and updating of the risk assessment

Contents of company-specific support:

- Checking of the stationary shelving facilities
- Support in the implementation of an occupational health and safety management system according to DIN ISO 45001
- Work equipment-related risk assessment
- Preparation of the risk assessment
- Training of forklift drivers
- Support for the SARS-CoV-2 occupational health and safety rule

e. Whether the rates have been calculated based on 200,000 or 1,000,000 hours worked.

The rates have been calculated based on 200,000 hours worked.

f. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded.

No employees / workers are excluded from this disclosure.

g. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

- 30 accidents with lost time one day or more multiplied by 200,000 hours divided by hours worked (full and part time approximately 2.576.378,48 hours).
- LTIFR: Number of accidents with lost time one day or more (default).

3. Training and Development

GRI 103: Management Approach 2016

The CRONIMET Holding GmbH in Karlsruhe, Germany, has invested in a dedicated full time equivalent for Human Resources Development since 2017. Even before 2017 there was already implemented a project team constantly working on topics concerning Human Resources Development.

Since 2017 we have implemented four core processes with regards to Human Resources Development: the Employee Feedback Interview (Annual performance appraisal), the Personal Development Interview, a 90° Feedback for managers and a group-wide succession planning. All core processes help us to identify development needs in our employee population. Our target is to promote individual potential in line with the company's strategic targets, corporate values and leadership principles. This contributes to the sustainable development of our workforce and the whole company. We see ourselves as a learning company and bundle all development opportunities under the umbrella of the CRONIMETacademy. Since October 2019 we have invested in a second full time equivalent to meet the growing demand and to constantly roll out our Holding services to our subsidiaries around the world.

Each department involved in training organization (i.e. Human Resources Development, Management Systems & Environment, IT-Security, Legal, Compliance etc.) records the trainings organized. A double check is performed through the data provided by our financial accounting department once trainings are invoiced. The personnel- and organizational development department then records all trainings booked in an Excel file to have an overview and history about booked trainings. The data recorded in this file is: name of the employee, training, training provider, date and duration of training, cost.

Due to the limited data available, the following disclosure regarding the material topic "Training and development" applies exclusively to the following German sites of CRONIMET:

- CRONIMET Ferroleg. GmbH
- CRONIMET Holding GmbH
- CRONIMET Raw Materials GmbH

GRI 102: Ethics and Integrity 2016

Disclosure 102-17: Mechanisms for advice and concerns about ethics

CRONIMET places the highest priority on the observance of legal regulations and internal compliance rules. Our serious effort to uncover and remedy misconduct is reflected in the anonymous whistleblowing system.

Early detection of criminal and acts which might damage the company is not only decisive for the perception of our social and ecological responsibility but also for our economic success. We rely on responsible and honest actions and welcome any information with the intention of uncovering any wrongdoing.

Violations of the Code of Conduct and other misconduct can be reported using the whistle-blower system. This ensures that employees and third parties can anonymously and safely submit information in more than 30 different languages, without having to fear negative consequences or disadvantages. Every whistleblower has the possibility to inform anonymously about the progress of the processing or clarification of his or her report.

All employees are informed about the availability of the whistleblower system after they have entered CRONIMET during orientation sessions. The whistleblowing system is available to all employees worldwide online, via the intranet and via a QR code on posters on the yard.

In addition to the whistleblowing system, direct supervisors and the compliance department are, of course, available to employees in confidence for sensitive issues.

GRI 404: Training and Education 2016

The part following below addresses the topic of training and education. This includes an organization's approach to training and upgrading employee skills, and performance and career development reviews. It also includes transition assistance programs to facilitate continued employability, and the management of career endings due to retirement or termination.

Disclosure 404-1: Average hours of training per year per employee

a. Average hours of training that the organization's employees have undertaken during the reporting period, by:

i. by gender:

Corporation	Average hours of training per employee	
CRONIMET Holding GmbH	15.32 hours	
	Female: 19.4 hours	Male: 1.64 hours
CRONIMET Ferroleg. GmbH	6.27 hours	
	Female: 22.88 hours	Male: 1.64 hours
CRONIMET Raw Materials GmbH	6.15 hours (not included: internal trainings)	
	Female: 4.4 hours	Male: 8.3 hours

ii. by employee category:

Corporation	Average hours of training per employee category	
CRONIMET Holding GmbH	Commercial: 15.32 hours	Industrial: 0 hours* <small>(*CRONIMET Holding GmbH has no industrial employees)</small>
CRONIMET Ferroleg. GmbH	Commercial: 8.72 hours	Industrial: 4.72 hours
CRONIMET Raw Materials GmbH	Commercial: 5.7hours	Industrial: 8.0 hours

**Commercial: white-collar workers, Industrial: blue-collar workers*

Disclosure 404-2: Programs for upgrading employee skills and transition assistance programs

a. Type and scope of programs implemented, and assistance provided to upgrade employee skills

First, we have a comprehensive onboarding training program for all new hirings, including health and safety training, meeting with all department heads and certain standard trainings like compliance, data protection, fraud etc. In general, we bundle all training and development opportunities under the umbrella of the CRONIMET Academy.

We have various internal and external offerings, based on the needs deriving from the four core processes (Employee Feedback Interview, Personal Development Interview, 90° Feedback for managers, succession planning). But not only in the interview's development needs can be identified, also during the year manager and employee can talk about the employee's development and contact personnel development department if there is a need for development measures. Together with employees and managers the Human Resources Development department then identifies and organizes development measures that meet the employee's need.

Typical training programs are about:

- Leadership, e.g. "First time in a leadership role", "Developing from a colleague to a manager", "Leadership Basics", "Agile Leadership" etc.
- Communication
- Conflict Management
- Presentation and Facilitation
- Project Management
- Relationship Management

In addition to trainings, we are offering Coaching and Mentoring. We have a culture where it is easy to learn from colleagues, e.g., by using single or several days to visit another department to better understand interfaces between the own and other departments.

We have colleagues offering internal trainings for topics where they have leading knowledge and we organize regular Learn@Lunch sessions, where colleagues learn about new topics. Moreover, we have a vocational training and dual vocational training as well as an international development program.

b. Transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.

We follow an approach of continuous learning. There is no special transition program. However, we start early to plan the succession of key positions through our succession planning process. We are offering pre-retirement planning and consultation for intended retirees. Eventual severance payments take into account the age and years of services. In certain cases, we are offering outplacement services.

Disclosure 404-3: Percentage of employees receiving regular performance and career development review

a. Percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period.

For all commercial employees and all industrial managers there is a defined minimum standard regarding this topic, and each one receives an employee feedback interview. Its focus is to discuss goals, task, performance, collaboration and corporate values and leadership principles. For industrial employees without leadership responsibility there are regular but less standardized performance reviews conducted. The adjusted target group (without employees being long-term sick, close to retirement, in probation period or maternity or parental leave) received a performance and career development reviews to 100 percent in 2021, no difference to sex or category.

4. Diversity and Equal Opportunities

GRI 103: Management Approach 2016

We are convinced that the only true competitive advantage are our employees. Their skills and commitment make us successful, especially in times of high global dynamics and instabilities, demographic change and increasing regulatory requirements. Diversity and equity thus contribute significantly to making our company more efficient, adaptable and competitive. Diversity enriches our company by directly promoting creative solutions and thus also contributes to further increasing our productivity. We reject unequal treatment or disparagement on the basis of gender, racial or ethnic origin, religion or belief, disability, sexual orientation or age with the utmost conviction and determination. This applies unreservedly throughout the company and is firmly anchored in our corporate values, our management principles and our corporate culture as a whole.

Our life-phase-oriented personnel policy provides the necessary framework and the corresponding flexibility. A wide variety of working time models make it possible to integrate professional and private requirements in the best possible way.

The following disclosure includes the data of those locations that are material to our operating result and / or our long-term strategy to the extent all relevant data are available – except representative offices, commercial agencies, joint ventures in which we do not have a majority stake, or subsidiaries that are up for sale.

GRI 405: Diversity and Equal Opportunity 2016

The part following below addresses the topic of an organization's approach to diversity and equal opportunity at work. When an organization actively promotes diversity and equality at work, it can generate significant benefits for both the organization and workers. For example, the organization can gain access to a larger and more diverse set of potential workers. These benefits also flow through to society in general, as greater equality promotes social stability and supports further economic development.

Disclosure 405-1: Diversity of governance bodies and employees

a. Percentage of individuals within the organization's governance bodies in each of the following diversity categories:

i. Gender:

**) The term "manager" refers to employees who hold a managerial position within CRONIMET and exercise disciplinary leadership over employees.*

Corporation	Female Managers* (%)	Male Managers* (%)
Cronifer UK Ltd.	0 %	100 %
CRONIMET (Great Britain) Ltd.	0 %	100 %
CRONIMET (Holland) b.v.	0 %	100 %
CRONIMET RSA (PTY) Ltd.	40 %	60 %
CRONIMET ALFA Ferro-legierungen Handels GmbH	0 %	100 %
CRONIMET Brasil Ltda.	50 %	50 %
CRONIMET Holdings, Inc.	8.3 %	91.7 %
Metall Service Pedack GmbH	0 %	100 %
CRONIMET Envirotec GmbH	33.33 %	66.67 %
CRONIMET Fagersta AB	33.33 %	66.67 %
CRONIMET Ferroleg. GmbH	14.29 %	85.71 %
CRONIMET HISPANIA, S. A.	0 %	100 %
CRONIMET Holding GmbH	34.78 %	65.22 %
CRONIMET PL Sp. z.o.o. (Poland)	88.89 %	11.11 %
CRONIMET Nordic OÜ	12.5 %	87.5 %
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	60 %	40 %
CRONIMET Raw Materials GmbH	0 %	100 %
CRONIMET Turkey Metal Ticaret A.S.	0 %	100 %
ERG Edelstahl Recycling GmbH	0 %	100 %
Metalloy Metalle-Legierungen GmbH	0 %	100 %
Nichel Leghe SpA	42.86 %	57.14 %

ii. Age group: under 30 years old, 30-50 years old, over 50 years old;

Corporation	Under 30 years old (%)	30-50 years old (%)	Over 50 years old (%)
Cronifer UK Ltd.	0 %	0 %	100 %
CRONIMET (Great Britain) Ltd.	0 %	50 %	50 %
CRONIMET (Holland) b.v.	0 %	66.67 %	33.33 %
CRONIMET RSA (PTY) Ltd.	0 %	40 %	60 %
CRONIMET ALFA Ferro- legierungen Handels GmbH	0 %	0 %	100 %
CRONIMET Brasil Ltda.	0 %	100 %	0 %
CRONIMET Holdings, Inc.	8.57 %	42.86 %	48.57 %
Metall Service Pedack GmbH	0 %	100 %	0 %
CRONIMET Envirotec GmbH	66.67 %	33.33 %	0 %
CRONIMET Fagersta AB	0 %	0 %	100 %
CRONIMET Ferroleq. GmbH	7.14 %	67.86 %	25 %
CRONIMET HISPANIA, S. A.	0 %	0 %	100 %
CRONIMET Holding GmbH	0 %	56.52 %	43.48 %
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	11.11 %	33.33 %	55.56 %
CRONIMET Nordic OÜ	0 %	100 %	0 %
CRONIMET PL Sp. z.o.o. (Poland)	0 %	80 %	20 %
CRONIMET Raw Materials GmbH	0 %	100 %	0 %
CRONIMET Turkey Metal Ticaret A.S.	50 %	0 %	50 %
ERG Edelstahl Recycling GmbH	0 %	66.67 %	33.33 %
Metalloy Metalle-Legierungen GmbH	0 %	66.67 %	33.33 %
Nichel Leghe SpA	0 %	57.14 %	42.86 %

iii. Other indicators of diversity where relevant. Nationalities of different locations.

Corporation	Nationality
Cronifer UK Ltd.	British
CRONIMET (Great Britain) Ltd.	British
CRONIMET (Holland) b.v.	Dutch
CRONIMET RSA (PTY) Ltd.	American, South African
CRONIMET ALFA Ferro-legierungen Handels GmbH	German
CRONIMET Brasil Ltda.	Brasilian, German
CRONIMET Holdings, Inc.	American, Brasilian, United states minor outlying islands
Metall Service Pedack GmbH	German
CRONIMET Envirotec GmbH	German, Belgian
CRONIMET Fagersta AB	Swedish
CRONIMET Ferroleq. GmbH	German, Croatian
CRONIMET HISPANIA, S. A.	Spanish
CRONIMET Holding GmbH	German, French
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	German, Moroccan
CRONIMET Nordic OÜ	Estonian
CRONIMET PL Sp. z.o.o. (Poland)	Polish, Czech
CRONIMET Raw Materials GmbH	German
CRONIMET Turkey Metal Ticaret A.S.	Turkish
ERG Edelstahl Recycling GmbH	German
Metalloy Metalle-Legierungen GmbH	German
Nichel Leghe SpA	Italian

b. Percentage of employees per employee category in each of the following diversity categories:

i. Gender:

Corporation	Female Employee (%)	Male Employee (%)
Cronifer UK Ltd.	9.09 %	90.91 %
CRONIMET (Great Britain) Ltd.	19.35 %	80.65 %
CRONIMET (Holland) b.v.	21.05 %	78.95 %
CRONIMET RSA (PTY) Ltd.	15.15 %	84.85 %
CRONIMET ALFA Ferro-legierungen Handels GmbH	25 %	75 %
CRONIMET Brasil Ltda.	18.75 %	81.25 %
CRONIMET Holdings, Inc.	10.40 %	89.60 %
Metall Service Pedack GmbH	32 %	68 %
CRONIMET Envirotec GmbH	21.21 %	78.79 %
CRONIMET Fagersta AB	20 %	80 %
CRONIMET Ferroleq. GmbH	20.98 %	79.02 %
CRONIMET HISPANIA, S. A.	33.33 %	66.67 %
CRONIMET Holding GmbH	43.22 %	56.78 %
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	13.64 %	86.36 %
CRONIMET Nordic OÜ	12.77 %	87.23 %
CRONIMET PL Sp. z.o.o. (Poland)	21.64 %	78.36 %
CRONIMET Raw Materials GmbH	57.89 %	42.11 %
CRONIMET Turkey Metal Ticaret A.S.	20 %	80 %
ERG Edelstahl Recycling GmbH	12 %	88 %
Metalloy Metalle-Legierungen GmbH	15 %	85 %
Nichel Leghe SpA	29.03 %	70.97 %

ii. Age group: under 30 years old, 30-50 years old, over 50 years old;

Corporation	Under 30 years old (%)	30-50 years old (%)	Over 50 years old (%)
Cronifer UK Ltd.	18.18 %	45.45 %	36.36 %
CRONIMET (Great Britain) Ltd.	25.81 %	35.48 %	38.71 %
CRONIMET (Holland) b.v.	0 %	63.16%	36.84 %
CRONIMET RSA (PTY) Ltd.	16.67 %	54.55 %	28.79 %
CRONIMET ALFA Ferro-legierungen Handels GmbH	4.17 %	45.83 %	50 %
CRONIMET Brasil Ltda.	28.13 %	62.5 %	9.38 %
CRONIMET Holdings, Inc.	15.44 %	56.04 %	28.52 %
Metall Service Pedack GmbH	24 %	32 %	48 %
CRONIMET Envirotec GmbH	27.27 %	48.48 %	24.24 %
CRONIMET Fagersta AB	5 %	70 %	25 %
CRONIMET Ferroleq. GmbH	13.99 %	49.65 %	36.36 %
CRONIMET HISPANIA, S. A.	13.33 %	73.33 %	13.33 %
CRONIMET Holding GmbH	22.03 %	55.08 %	22.88 %
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	4.55 %	47.73 %	47.73 %
CRONIMET Nordic OÜ	14.89 %	61.70 %	23.40 %
CRONIMET PL Sp. z.o.o. (Poland)	14.18 %	62.69 %	23.13 %
CRONIMET Raw Materials GmbH	21.05 %	63.16 %	15.79 %
CRONIMET Turkey Metal Ticaret A.S.	46.67 %	46.67 %	6.67 %
ERG Edelstahl Recycling GmbH	20 %	44 %	36%
Metalloy Metalle-Legierungen GmbH	5 %	45 %	50 %
Nichel Leghe SpA	12.90 %	64.52 %	22.58 %

iii. Other indicators of diversity where relevant. Nationalities of different locations.

Corporation	Nationality
Cronifer UK Ltd.	British
CRONIMET (Great Britain) Ltd.	British
CRONIMET (Holland) b.v.	Dutch, Belgian, British
CRONIMET RSA (PTY) Ltd.	American, South African, Dutch, Brazilian
CRONIMET ALFA Ferro-legierungen Handels GmbH	German
CRONIMET Brasil Ltda.	Brazilian
CRONIMET Holdings, Inc.	American, Brazilian, United states minor outlying islands, Estonian
Metall Service Pedack GmbH	German, Swiss, Turkish, Nigerian, Bulgarian
CRONIMET Envirotec GmbH	German, Polish
CRONIMET Fagersta AB	Swedish, Estonian
CRONIMET Ferroleq. GmbH	German, Croatian, Algerian, Brazilian, French, Italian, Polish, Serbian, Spanish, Turkish, Ukrainian, Hungarian
CRONIMET HISPANIA, S. A.	Spanish, German
CRONIMET Holding GmbH	German, French, British, Greek, Croatian, Macedonian, Austrian, Russian, Swiss, Romanian
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	German, Bosnian, Italian, Romanian, Syrian
CRONIMET Nordic OÜ	Estonian, Dutch
CRONIMET PL Sp. z.o.o. (Poland)	Czech, Belgian, Polish
CRONIMET Raw Materials GmbH	German, Belgian, Chilean
CRONIMET Turkey Metal Ticaret A.S.	Turkish, Dutch
ERG Edeltahl Recycling GmbH	German, Italian, Polish
Metalloy Metalle-Legierungen GmbH	German
Nichel Leghe SpA	Italian, Brazilian

Disclosure 405-2: Ratio of basic salary and remuneration of women to men

We currently have no valid information for this disclosure. In order to be able to provide reliable data here, a uniform job categorization is required across the CRONIMET Group. At the moment this is not the case. We are currently working on this task and are confident that we will be able to complete it in the next few years.

Philanthropic Activities / Contributions

GRI 103: Management Approach 2016

As an internationally active family-owned company, we are aware that we bear responsibility beyond economic success: responsibility for people and the environment. We see ourselves as part of society, at our respective locations as well as worldwide. That's why we work with our employees and non-profit organizations to promote social, sustainable initiatives to help overcome local challenges. We focus on combating poverty and hunger, promoting education and culture, and protecting the environment.

Our commitment is based on three pillars: employee volunteering, long-term partnerships with non-profit organizations, and emergency aid in the event of natural and humanitarian disasters.

As part of our social commitment, we not only implement our own projects, but also promote the voluntary work of our employees: for example, with a long-standing partnership with Caritas in Karlsruhe. Together with all employees, we regularly collect donations of food, hygiene articles, toys and clothing for the Beiertheimer Tafel. We also organize regular aid missions, so-called social days. We also provide financial support to associations in which our employees are active. We also give them time off when they go on aid missions, for example for Ukrainian refugees. We are involved in various environmental initiatives and promote environmental awareness among our employees through hands-on activities. Our involvement ranges from joint garbage collection and tree planting campaigns to supporting organizations that improve access to clean water in remote areas.

In addition to the voluntary work of our employees, we also provide financial support. We make donations or cooperate with nonprofit organizations that work to fight poverty and hunger, provide equal opportunities and improve people's lives together. One example of CRONIMET's close cooperation with an NGO is the partnership with Togo-Hilfe e.V., which has existed for almost 10 years. The core objective of Togo-Hilfe e.V. is to provide the people of Togo with charitable help to help themselves. Donations are used to finance training centers, schools, wells, sanitary facilities, etc. on site.

The above examples essentially provide an insight into the commitment of the Karlsruhe site. Our subsidiaries around the world are also committed to society in a wide variety of ways. We are working on standardizing the measurement of success here.

We are in the process of developing a corporate citizenship strategy for the CRONIMET Group. A strategy for social engagement that simultaneously inspires and motivates our stakeholders to take action themselves. Our guiding principles for this group-wide strategy are, on the one hand, our vision and values with the goal of enabling a fairer and more sustainable life for all, which is deeply rooted in our corporate DNA and drives us. Secondly, we are also guided by the Sustainable Development Goals (SDGs) of the United Nations. In the future, we would like to measure the impact of our social commitment Group-wide with a set of ESG KPIs and are currently in the process of identifying and implementing these. We also plan to include a selection of these KPIs in our financing structure.

The following disclosure includes the data of those locations that are material to our operating result and / or our long-term strategy to the extent all relevant data are available – except representative offices, commercial agencies, joint ventures in which we do not have a majority stake, or subsidiaries that are up for sale.

GRI 201: Economic Performance 2016

The part following below addresses the topic of economic performance. This includes the economic value generated and distributed (EVG&D) by an organization, its defined benefit plan obligations, the financial assistance it receives from any government, and the financial implications of climate change.

Disclosure 201-1: Direct economic value generated and distributed

- a. Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components:**

- i. Direct economic value generated revenues;*

3,486,262,724.99 EUR

- ii. Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments;*

Disclosing how we split our revenue allows our competitors to deduce which countries we are in and which margins can realize. As a trading company, we cannot disclose this critical information as this are part of our trade secrets.

Community investments: 103,509.52 EUR

The term "community investments" refers to all payments made to charitable organizations.

All other data see table below

iii. *Economic value retained: 'direct economic value generated' less 'economic value distributed'.*

	01.01. – 31.12.2021
	EUR
1. Revenue and other operating income	3,486,262,724.99
2. Material costs	3,013,573,098.02
3. Personnel costs	90,141,964.23
4. Depreciations	44,945,307.01
5. Other operating expenses	262,793,117.14
6. Other income	6,164,725.29
7. Depreciation of financial assets	4,202,900.63
8. Interest and similar expenses	17,808,432.41
9. Taxes on income and earnings	22,209,402.60
10. Earnings after taxes	36,753,228.24
11. Other taxes	1,474,660.67
12. Net income	35,278,567.57

5. Responsibility in the Supply Chain

GRI 103: Management Approach 2016

We expect our suppliers to comply with our Supplier Code of Conduct. This is part of our general terms and conditions of purchase. In addition, we endeavor to contractually oblige our main suppliers to take part in the internal supplier screening.

We hope that our suppliers have introduced a management system that meets the requirements of the ISO 9001 standard (quality management). We ask whether our suppliers have additional certifications, in particular whether they maintain an ISO 14001-certified environmental management system (EMS). CRONIMET gives preference to suppliers who can demonstrate a certified EMS.

Systematic risk monitoring is an important tool for CRONIMET. It serves to correctly evaluate our supplier relationships and to coordinate our procurement strategies accordingly. In the period under review, we used our own supplier assessments and increased direct contact with our partners. Key criteria include quality, risk of non-delivery, availability and dependency, know-how protection and the economic stability of a supplier.

Our complaint management and annual supplier evaluations enable us to work with our suppliers to continuously improve their performance.

To avoid the use of conflict minerals, which directly or indirectly finance, or benefit armed groups and/or involve other serious human right abuses in high-risk and conflict-affected regions, CRONIMET has developed a supply chain policy and measures for our raw materials processing locations. The supply chain policy is fully aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance) and the corresponding EU regulation (Regulation (EU) 2017/821). The supply chain policy defines the ethical guiding principle towards conflict minerals, and how risks are assessed and managed in our supply chain. It covers all the risks identified in Annex II of the OECD Guidance and its geographic scope is global. The company is committed to addressing any Annex II risks if identified. The corresponding measurements implemented, ensure that we procure primary raw materials exclusively from conflict-free sources.

Responsible procurement of tungsten is ensured via a risk management system incorporated into the IMS. The risk management system includes a regular review of the identified risks in the supply chain, including risk assessment and the measures defined to reduce risks. Potential business partners for primary raw materials are screened on a risk basis for negative media news, embargo regulations as well as sanctions lists. In case of not meeting requirements, such as adequate proof of country of origin, certifications or compliance with legal rules, a business transaction is excluded. Primary raw materials from countries on the CAHRAS (Conflict Affected and High-Risk Areas) list are excluded from business transactions.

The material's proof of origin and accompanying documentation is checked with regard to transparency. The policy was reviewed and approved by senior management, which committed to support its implementation. The policy is available on the company website.

The following disclosure includes the data of those locations that are material to our operating result and / or our long-term strategy to the extent all relevant data are available – except representative offices, commercial agencies, joint ventures in which we do not have a majority stake, or subsidiaries that are up for sale.

GRI 102: General Disclosures 2016

Disclosure 102-10: Significant changes to the organization and its supply chain

GRI 308: Supplier Environmental Assessment 2016

The part following below addresses the topic of supplier environmental assessment. An organization may be involved with negative environmental impacts either through its own activities or as a result of its business relationships with other parties. Due diligence is expected of an organization in order to prevent, mitigate, and address actual and potential negative environmental impacts in the supply chain. These include negative impacts the organization either causes or contributes to, or that are directly linked to its operations, products, or services by its relationship with a supplier.

Disclosure 308-1: New suppliers that were screened using environmental criteria

a. Percentage of new suppliers that were screened using environmental criteria.

Corporation	Percentage of new suppliers screened using environmental criteria
Cronifer UK Ltd.	0 %
CRONIMET (Great Britain) Ltd.	0 %
CRONIMET (Holland) b.v.	0 %
CRONIMET RSA (PTY) Ltd.	0 %
CRONIMET ALFA Ferrolegerungen Handels GmbH	0 %
CRONIMET Brasil Ltda.	0 %
CRONIMET Holdings, Inc.	0 %
Metall Service Pedack GmbH	0 %
CRONIMET Envirotec GmbH	Nearly all suppliers undergo a thorough onboarding process until we accept their material. We use ISO 9001. 1a) Material quality, reliability, corporate size 1b) Big suppliers such as Outokumpu, we don't take this into our evaluation process 2.) Ranking suppliers by delivery size → 90% have been screened
CRONIMET Fagersta AB	0 %
CRONIMET Ferroleger. GmbH	100 %
CRONIMET HISPANIA, S. A.	100 %

CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit.
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	100 %
CRONIMET Nordic OÜ	40 %
CRONIMET PL Sp. z.o.o. (Poland)	100 % Every new supplier is screened on the topic of environmental requirements. These requirements have to be fulfilled in order to trade scrap.
CRONIMET Raw Materials GmbH	100 %
CRONIMET Turkey Metal Ticaret A.S.	0 %
ERG Edelstahl Recycling GmbH	100 %
Metalloy Metalle-Legierungen GmbH	100 %
Nichel Leghe SpA	100% All new suppliers are screened, beside other standards, also using environmental sustainability criterias such as their availability of UNI EN ISO 14001:2015 certification (environmental management systems) and based on the prescriptions given by the Nichel Leghe environmental authorization.

Disclosure 308-2: Negative environmental impacts in the supply chain and actions taken

a. Number of suppliers assessed for environmental impacts.

Corporation	Number of suppliers assessed for environmental impacts
Cronifer UK Ltd.	None
CRONIMET (Great Britain) Ltd.	None
CRONIMET (Holland) b.v.	None
CRONIMET RSA (PTY) Ltd.	None
CRONIMET ALFA Ferrolegerungen Handels GmbH	None
CRONIMET Brasil Ltda.	None
CRONIMET Holdings, Inc.	None
Metall Service Pedack GmbH	None
CRONIMET Envirotec GmbH	2,022
CRONIMET Fagersta AB	None
CRONIMET Ferroleg. GmbH	All suppliers were assessed.
CRONIMET HISPANIA, S. A.	All suppliers were assessed.
CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit.
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	All suppliers were assessed.
CRONIMET Nordic OÜ	12
CRONIMET PL Sp. z.o.o. (Poland)	All suppliers were assessed.

CRONIMET Raw Materials GmbH	All suppliers were assessed.
CRONIMET Turkey Metal Ticaret A.S.	None
ERG Edelstahl Recycling GmbH	All suppliers were assessed.
Metalloy Metalle-Legierungen GmbH	All suppliers were assessed.
Nichel Leghe SpA	All suppliers were assessed.

b. Number of suppliers identified as having significant actual and potential negative environmental impacts.

Corporation	Number of suppliers identified with actual and potential negative environmental impacts
Cronifer UK Ltd.	No assessment.
CRONIMET (Great Britain) Ltd.	No assessment.
CRONIMET (Holland) b.v.	No assessment.
CRONIMET RSA (PTY) Ltd.	No assessment.
CRONIMET ALFA Ferrolegerungen Handels GmbH	No assessment.
CRONIMET Brasil Ltda.	No assessment.
CRONIMET Holdings, Inc.	No assessment.
Metall Service Pedack GmbH	No assessment.
CRONIMET Envirotec GmbH	Zero
CRONIMET Fagersta AB	No assessment.
CRONIMET Ferroleger. GmbH	Zero
CRONIMET HISPANIA, S. A.	Zero
CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit.
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	Zero.
CRONIMET Nordic OÜ	Zero
CRONIMET PL Sp. z.o.o. (Poland)	Zero
CRONIMET Raw Materials GmbH	Zero
CRONIMET Turkey Metal Ticaret A.S.	No assessment.
ERG Edelstahl Recycling GmbH	Zero
Metalloy Metalle-Legierungen GmbH	Zero.
Nichel Leghe SpA	Zero

c. Significant actual and potential negative environmental impacts identified in the supply chain.

Corporation	Significant actual and potential negative environmental impacts identified
Cronifer UK Ltd.	No assessment.
CRONIMET (Great Britain) Ltd.	No assessment.
CRONIMET (Holland) b.v.	No assessment.
CRONIMET RSA (PTY) Ltd.	No assessment.
CRONIMET ALFA Ferrolegerungen Handels GmbH	No assessment.
CRONIMET Brasil Ltda.	No assessment.
CRONIMET Holdings, Inc.	No assessment.
Metall Service Pedack GmbH	No assessment.
CRONIMET Envirotec GmbH	No significant actual and potential negative environmental impacts where identified.
CRONIMET Fagersta AB	No assessment.
CRONIMET Ferroleger. GmbH	No significant actual and potential negative environmental impacts where identified.
CRONIMET HISPANIA, S. A.	No significant actual and potential negative environmental impacts where identified.
CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit.
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	No significant actual and potential negative environmental impacts where identified.
CRONIMET Nordic OÜ	No significant actual and potential negative environmental impacts where identified.
CRONIMET PL Sp. z.o.o. (Poland)	No significant actual and potential negative environmental impacts where identified.
CRONIMET Raw Materials GmbH	No significant actual and potential negative environmental impacts where identified.
CRONIMET Turkey Metal Ticaret A.S.	No assessment.
ERG Edelstahl Recycling GmbH	No significant actual and potential negative environmental impacts where identified.
Metalloy Metalle-Legierungen GmbH	No significant actual and potential negative environmental impacts where identified.
Nichel Leghe SpA	No significant actual and potential negative environmental impacts where identified.

d. Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment.

Corporation	Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment.
Cronifer UK Ltd.	No assessment.
CRONIMET (Great Britain) Ltd.	No assessment.
CRONIMET (Holland) b.v.	No assessment.
CRONIMET RSA (PTY) Ltd.	No assessment.
CRONIMET ALFA Ferrolegerungen Handels GmbH	No assessment.
CRONIMET Brasil Ltda.	No assessment.
CRONIMET Holdings, Inc.	No assessment.
Metall Service Pedack GmbH	No assessment.
CRONIMET Envirotec GmbH	0 %
CRONIMET Fagersta AB	No assessment.
CRONIMET Ferroleger. GmbH	0 %
CRONIMET HISPANIA, S. A.	0 %
CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit.
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	0 %
CRONIMET Nordic OÜ	0 %
CRONIMET PL Sp. z.o.o. (Poland)	0%
CRONIMET Raw Materials GmbH	0 %
CRONIMET Turkey Metal Ticaret A.S.	No assessment.
ERG Edelstahl Recycling GmbH	0 %
Metalloy Metalle-Legierungen GmbH	0 %
Nichel Leghe SpA	0%

- e. Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why.

Corporation	Percentage of suppliers identified as having significant actual and potential negative environmental impacts
Cronifer UK Ltd.	No assessment.
CRONIMET (Great Britain) Ltd.	No assessment.
CRONIMET (Holland) b.v.	No assessment.
CRONIMET RSA (PTY) Ltd.	No assessment.
CRONIMET ALFA Ferrolegerungen Handels GmbH	No assessment.
CRONIMET Brasil Ltda.	No assessment.
CRONIMET Holdings, Inc.	No assessment.
Metall Service Pedack GmbH	No assessment.
CRONIMET Envirotec GmbH	0 %
CRONIMET Fagersta AB	No assessment.
CRONIMET Ferroleger. GmbH	0 %
CRONIMET HISPANIA, S. A.	0 %
CRONIMET Holding GmbH	Not available, as CRONIMET Holding GmbH is no operational unit.
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	0 %
CRONIMET Nordic OÜ	0 %
CRONIMET PL Sp. z.o.o. (Poland)	0%
CRONIMET Raw Materials GmbH	0 %
CRONIMET Turkey Metal Ticaret A.S.	No assessment.
ERG Edelstahl Recycling GmbH	0 %
Metalloy Metalle-Legierungen GmbH	0 %
Nichel Leghe SpA	.0%

Governance

Compliance and Good Corporate Governance

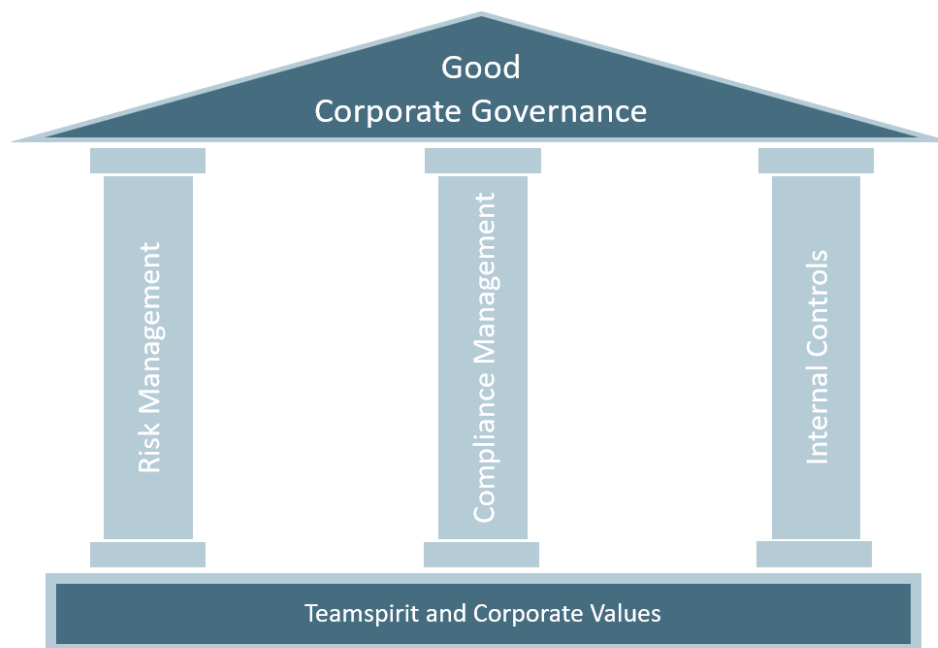
Anti-financial Crime

C. Governance

The management approach at CRONIMET refers to the entire issue Governance covers both material topics "Anti-financial Crime" as well as "Compliance and Good Corporate Governance".

GRI 103: Management Approach 2016

Three pillars form the good governance of CRONIMET.



The first pillar is the Risk Management System, which has been established as a separate staff unit at CRONIMET since 2018 and is now anchored throughout the group. Risks are defined as deviations from planned targets and can be positive (opportunities) or negative (threats). The focus is on the latter, especially in the case of a potential threat to the company's existence, which is why the topic is also managed centrally within the CRONIMET Holding GmbH. The approach is divided into the following five steps, which are repeated regularly: Identification, Analysis, Aggregation, Mitigation and Monitoring. Risk Management also plays a decisive role in increasing the transparency of our management's decision-making processes. This makes a significant contribution to securing the future success of the company and achieving our corporate goals – thus increasing the value of the company.

During the implementation process, we have paid and will continue to pay attention to strengthening the risk awareness of our employees. In order to be able to counter emerging developments even more quickly in the future, the existing system of key figures is currently being expanded. The key figures are recorded in an early warning indicator system on a quarterly basis, whereby the focus is still on key figures from the financial area in view of the high-risk relevance.

All processes of our group-wide Risk Management are, of course, in accordance with the respective national legislation of the countries in which our subsidiaries operate.

The Compliance Management System (CMS) of CRONIMET is the second pillar and is structurally based on the “Principles of proper auditing of compliance management systems” according to the standard IDW PS 980. We make use of the compliance elements to realize a systematic approach in the overall organization. In addition, other management standards are considered. CRONIMET operates according to ethical principles of corporate governance that go beyond the legal requirements. Our compliance goals are linked to the general corporate goals and are intended not only to protect the company from existential damage, but also to make a positive contribution to society and environment. The basis for our compliance culture is formed by our CRONIMET corporate values, which also constitute the foundation for our Code of Conduct. All employees are obliged to comply with them. The management of the holding company as well as the local managing directors of our subsidiaries ensure that they encourage a positive compliance attitude with their tone at the top and exemplary behavior.

CRONIMET regularly carries out a Compliance Risk Analysis (CRA) in all its companies. The compliance program is derived from the findings of the CRA. It is risk-based, takes into account our industry-specific characteristics and the complexity of an internationally active company such as CRONIMET. Our compliance program addresses classic compliance risks such as corruption, money laundering, cartelization and fraud and defines measures for the prevention and detection of such misconduct. Appropriate guidelines, work instructions and internal controls have been implemented for this purpose. To prevent misconduct and compliance violations, the compliance communication provides for the necessary training of the various target groups within CRONIMET. Regular reporting to the CEO as well as to the extended circle of the Executive Board ensures that they are informed about the developments and events in the compliance department and can thus fulfil its responsibility. The defined reporting ensures the independence of the compliance organization, which is not only responsible for the operational implementation of the guidelines and compliance with them but is also available to all employees for advice and support on the topic of compliance.

In addition to the measures listed above, our serious effort to uncover and remedy misconduct is reflected in the anonymous whistleblowing system. In the event of observed violations, employees are required to inform their superiors, the compliance officers, the works council or those responsible in the human resources department. Regular reviews of individual measures and compliance processes ensure that the CMS is constantly being developed and improved. The whistleblowing system supports compliance monitoring and improvement.

With its compliance programs, CRONIMET aims to prevent misconduct, minimize risks from misconduct and – in accordance with the UN Global Compact – uncover cases of corruption or other violations of the law. In doing so, we use organizational regulations such as the separation of functions and the dual control principle. The separation of functions makes it impossible for individual employees to carry out payment-triggering business processes on their own. The dual control principle ensures that every critical process is supervised by a second person.

CRONIMET strives to establish the internal control system as the third pillar. Therefore, the basis for systematization was created in 2021, when all essential processes were recorded. The identification and evaluation of existing controls and the resulting need for action to optimize effectiveness and efficiency will take place in the next step.

Due to the limited data available, the following disclosure regarding the material topic "Anti-financial crime" applies exclusively to the following German sites of CRONIMET:

- CRONIMET Envirotec GmbH
- CRONIMET Ferroleq. GmbH
- CRONIMET Holding GmbH
- CRONIMET Legierungen Dortmund Handelsgesellschaft mbH
- CRONIMET Raw Materials GmbH
- ERG Edelstahl Recycling GmbH

1. Compliance and Good Corporate Governance

GRI 102: General Disclosures 2016

Disclosure 102-56: External assurance

GRI 307: Environmental Compliance 2016

The part following below addresses the topic of environmental compliance, covering an organization's compliance with environmental laws and/or regulations. This includes compliance with international declarations, conventions and treaties, as well as national, sub-national, regional, and local regulations.

Disclosure 307-1: Non-compliance with environmental laws and regulations

a. Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations in terms of:

i. total monetary value of significant fines;

Zero

ii. total number of non-monetary sanctions;

Zero

iii. cases brought through dispute resolution mechanisms.

Zero

b. If the organization has not identified any non-compliance with environmental laws and/or regulations, a brief statement of this fact is sufficient.

No non-compliance compliance with environmental laws and/or regulations was identified.

GRI 419: Socioeconomic Compliance 2016

The part following below addresses the topic of addresses the topic of socioeconomic compliance. This includes an organization's overall compliance record, as well as compliance with specific laws or regulations in the social and economic area. Compliance can relate to accounting and tax fraud, corruption, bribery, competition, the provision of products and services, or labor issues, such as workplace discrimination, among others. This includes compliance with international declarations, conventions, and treaties, as well as national, sub-national, regional, and local regulations.

Disclosure 419-1: Non-compliance with laws and regulations in the social and economic area

a. Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of:

i. total monetary value of significant fines;

Zero

ii. total number of non-monetary sanctions;

Zero

iii. cases brought through dispute resolution mechanisms.

Zero

b. If the organization has not identified any non-compliance with laws and/or regulations, a brief statement of this fact is sufficient.

No non-compliance compliance with environmental laws and/or regulations was identified.

c. The context against which significant fines and non-monetary sanctions were incurred.

No non-compliance compliance with environmental laws and/or regulations was identified.

2. Risk management and Anti-corruption

GRI 205: Anti-corruption 2016

The part following below addresses the topic of anti-corruption. In this topic, corruption is understood to include practices such as bribery, facilitation payments, fraud, extortion, collusion, and money laundering; the offer or receipt of gifts, loans, fees, rewards, or other advantages as an inducement to do something that is dishonest, illegal, or represents a breach of trust. It can also include practices such as embezzlement, trading in influence, abuse of function, illicit enrichment, concealment, and obstructing justice. Corruption is broadly linked to negative impacts, such as poverty in transition economies, damage to the environment, abuse of human rights, abuse of democracy, misallocation of investments, and undermining the rule of law. Organizations are expected by the marketplace, international norms, and stakeholders to demonstrate their adherence to integrity, governance, and responsible business practices.

Disclosure 205-1: Operations assessed for risks related to corruption

a. Total number and percentage of operations assessed for risks related to corruption.

CRONIMET rejects any form of corruption. In order to identify critical positions in the company, a horizontal compliance risk analysis is carried out regularly. The risk of corruption in various business areas exists in principle in many business activities. CRONIMET has succeeded in further reducing the risk through the measures explicitly implemented to avoid corruption. As the whole CRONIMET Holding Group was evaluated, the total percentage of operations assessed for risks related to corruption is 100 %. The assessment includes a risk based business partner screening, extensive review of evidence relating to the counterparty's financial disclosures, as well as internal controls in the area of contract management and margin spread. Selected business partners are checked on a risk basis. The implemented controls take effect for every transaction that is created in SAP.

b. Significant risks related to corruption identified through the risk assessment.

Pending, Corporate Risk Assessment is not completed yet. The internal deadline for this is December 2022. Significant risks related to corruption have not been identified to date, or have only been identified with a low EW, which in turn would not be significant.

Disclosure 205-2: Communications and training about anti-corruption policies and procedures

CRONIMET has installed and communicated various anti-corruption measures. These measures, in the form of guidelines and work instructions, apply to the entire group. All employees, irrespective of employee category and region, must observe the imposed rules to the extent intended for them. In addition to the guidelines, the defensive stance against corruption, money laundering, fraud and other illegal financial activities is also conveyed in our corporate values, our Code of Conduct, as well as in the communication by the management and supervisors of the governance body.

a. Total number and percentage of governance body members that the organization's anti-corruption policies and procedures have been communicated to, broken down by region.

100 %. All governance body members will be trained on this, and in the future, there will be additional training courses, which will vary according to category. Training courses will also be offered in languages other than English and German.

b. Total number and percentage of employees that the organization's anti-corruption policies and procedures have been communicated to, broken down by employee category and region.

100 %. All employees will be trained on this, and in the future, there will be additional training courses, which will vary according to category. Training courses will also be offered in languages other than English and German.

c. Total number and percentage of business partners that the organization's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organization's anti-corruption policies and procedures have been communicated to any other persons or organizations.

100 %. Our Supplier Code of Conduct is an integral part of our General Terms of Purchase, which means that everyone with whom we conclude a contract has the obligation to respect it and comply with its requirements. In addition, the Code of Conduct is also available in various languages on our homepage.

- d. Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.

Corporation	Number of governance body members	Percentage of governance body members
CRONIMET Envirotec GmbH	3	100%
CRONIMET Ferroleg. GmbH	28	100%
CRONIMET Holding GmbH	23	100%
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	9	100%
CRONIMET Raw Materials GmbH	2	100%
ERG Edelstahl Recycling GmbH	3	100%

- e. Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region.

All employees working for the subsidiaries listed below have received training on anti-corruption, although not as a face-to-face event due to the current situation.

This results in the following table (governance body members excluded):

Corporation	Number of governance body members	Percentage of governance body members
CRONIMET Envirotec GmbH	30	100%
CRONIMET Ferroleg. GmbH	115	100%
CRONIMET Holding GmbH	95	100%
CRONIMET Legierungen Dortmund Handelsgesellschaft mbH	35	100%
CRONIMET Raw Materials GmbH	17	100%
ERG Edelstahl Recycling GmbH	22	100%

Disclosure 205-3: Confirmed incidents of corruption and actions taken**a. Total number and nature of confirmed incidents of corruption.**

None

b. Total number of confirmed incidents in which employees were dismissed or disciplined for corruption.

No incidents have been recorded here. This is not because there have been no consequences, but because there have been no incidents in this context.

c. Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.

None

d. Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.

None

Anlage 3

Allgemeine Auftragsbedingungen

für

Wirtschaftsprüfer und Wirtschaftsprüfungsgesellschaften

vom 1. Januar 2017

1. Geltungsbereich

(1) Die Auftragsbedingungen gelten für Verträge zwischen Wirtschaftsprüfern oder Wirtschaftsprüfungsgesellschaften (im Nachstehenden zusammenfassend „Wirtschaftsprüfer“ genannt) und ihren Auftraggebern über Prüfungen, Steuerberatung, Beratungen in wirtschaftlichen Angelegenheiten und sonstige Aufträge, soweit nicht etwas anderes ausdrücklich schriftlich vereinbart oder gesetzlich zwingend vorgeschrieben ist.

(2) Dritte können nur dann Ansprüche aus dem Vertrag zwischen Wirtschaftsprüfer und Auftraggeber herleiten, wenn dies ausdrücklich vereinbart ist oder sich aus zwingenden gesetzlichen Regelungen ergibt. Im Hinblick auf solche Ansprüche gelten diese Auftragsbedingungen auch diesen Dritten gegenüber.

2. Umfang und Ausführung des Auftrags

(1) Gegenstand des Auftrags ist die vereinbarte Leistung, nicht ein bestimmter wirtschaftlicher Erfolg. Der Auftrag wird nach den Grundsätzen ordnungsmäßiger Berufsausübung ausgeführt. Der Wirtschaftsprüfer übernimmt im Zusammenhang mit seinen Leistungen keine Aufgaben der Geschäftsführung. Der Wirtschaftsprüfer ist für die Nutzung oder Umsetzung der Ergebnisse seiner Leistungen nicht verantwortlich. Der Wirtschaftsprüfer ist berechtigt, sich zur Durchführung des Auftrags sachverständiger Personen zu bedienen.

(2) Die Berücksichtigung ausländischen Rechts bedarf – außer bei betriebswirtschaftlichen Prüfungen – der ausdrücklichen schriftlichen Vereinbarung.

(3) Ändert sich die Sach- oder Rechtslage nach Abgabe der abschließenden beruflichen Äußerung, so ist der Wirtschaftsprüfer nicht verpflichtet, den Auftraggeber auf Änderungen oder sich daraus ergebende Folgerungen hinzuweisen.

3. Mitwirkungspflichten des Auftraggebers

(1) Der Auftraggeber hat dafür zu sorgen, dass dem Wirtschaftsprüfer alle für die Ausführung des Auftrags notwendigen Unterlagen und weiteren Informationen rechtzeitig übermittelt werden und ihm von allen Vorgängen und Umständen Kenntnis gegeben wird, die für die Ausführung des Auftrags von Bedeutung sein können. Dies gilt auch für die Unterlagen und weiteren Informationen, Vorgänge und Umstände, die erst während der Tätigkeit des Wirtschaftsprüfers bekannt werden. Der Auftraggeber wird dem Wirtschaftsprüfer geeignete Auskunftspersonen benennen.

(2) Auf Verlangen des Wirtschaftsprüfers hat der Auftraggeber die Vollständigkeit der vorgelegten Unterlagen und der weiteren Informationen sowie der gegebenen Auskünfte und Erklärungen in einer vom Wirtschaftsprüfer formulierten schriftlichen Erklärung zu bestätigen.

4. Sicherung der Unabhängigkeit

(1) Der Auftraggeber hat alles zu unterlassen, was die Unabhängigkeit der Mitarbeiter des Wirtschaftsprüfers gefährdet. Dies gilt für die Dauer des Auftragsverhältnisses insbesondere für Angebote auf Anstellung oder Übernahme von Organfunktionen und für Angebote, Aufträge auf eigene Rechnung zu übernehmen.

(2) Sollte die Durchführung des Auftrags die Unabhängigkeit des Wirtschaftsprüfers, die der mit ihm verbundenen Unternehmen, seiner Netzwerkunternehmen oder solcher mit ihm assoziierten Unternehmen, auf die die Unabhängigkeitsvorschriften in gleicher Weise Anwendung finden wie auf den Wirtschaftsprüfer, in anderen Auftragsverhältnissen beeinträchtigen, ist der Wirtschaftsprüfer zur außerordentlichen Kündigung des Auftrags berechtigt.

5. Berichterstattung und mündliche Auskünfte

Soweit der Wirtschaftsprüfer Ergebnisse im Rahmen der Bearbeitung des Auftrags schriftlich darzustellen hat, ist alleine diese schriftliche Darstellung maßgebend. Entwürfe schriftlicher Darstellungen sind unverbindlich. Sofern nicht anders vereinbart, sind mündliche Erklärungen und Auskünfte des Wirtschaftsprüfers nur dann verbindlich, wenn sie schriftlich bestätigt werden. Erklärungen und Auskünfte des Wirtschaftsprüfers außerhalb des erteilten Auftrags sind stets unverbindlich.

6. Weitergabe einer beruflichen Äußerung des Wirtschaftsprüfers

(1) Die Weitergabe beruflicher Äußerungen des Wirtschaftsprüfers (Arbeitsergebnisse oder Auszüge von Arbeitsergebnissen – sei es im Entwurf oder in der Endfassung) oder die Information über das Tätigwerden des Wirtschaftsprüfers für den Auftraggeber an einen Dritten bedarf der schriftlichen Zustimmung des Wirtschaftsprüfers, es sei denn, der Auftraggeber ist zur Weitergabe oder Information aufgrund eines Gesetzes oder einer behördlichen Anordnung verpflichtet.

(2) Die Verwendung beruflicher Äußerungen des Wirtschaftsprüfers und die Information über das Tätigwerden des Wirtschaftsprüfers für den Auftraggeber zu Werbezwecken durch den Auftraggeber sind unzulässig.

7. Mängelbeseitigung

(1) Bei etwaigen Mängeln hat der Auftraggeber Anspruch auf Nacherfüllung durch den Wirtschaftsprüfer. Nur bei Fehlschlagen, Unterlassen bzw. unberechtigter Verweigerung, Unzumutbarkeit oder Unmöglichkeit der Nacherfüllung kann er die Vergütung mindern oder vom Vertrag zurücktreten; ist der Auftrag nicht von einem Verbraucher erteilt worden, so kann der Auftraggeber wegen eines Mangels nur dann vom Vertrag zurücktreten, wenn die erbrachte Leistung wegen Fehlschlagens, Unterlassung, Unzumutbarkeit oder Unmöglichkeit der Nacherfüllung für ihn ohne Interesse ist. Soweit darüber hinaus Schadensersatzansprüche bestehen, gilt Nr. 9.

(2) Der Anspruch auf Beseitigung von Mängeln muss vom Auftraggeber unverzüglich in Textform geltend gemacht werden. Ansprüche nach Abs. 1, die nicht auf einer vorsätzlichen Handlung beruhen, verjähren nach Ablauf eines Jahres ab dem gesetzlichen Verjährungsbeginn.

(3) Offenbare Unrichtigkeiten, wie z.B. Schreibfehler, Rechenfehler und formelle Mängel, die in einer beruflichen Äußerung (Bericht, Gutachten und dgl.) des Wirtschaftsprüfers enthalten sind, können jederzeit vom Wirtschaftsprüfer auch Dritten gegenüber berichtigt werden. Unrichtigkeiten, die geeignet sind, in der beruflichen Äußerung des Wirtschaftsprüfers enthaltene Ergebnisse infrage zu stellen, berechtigen diesen, die Äußerung auch Dritten gegenüber zurückzunehmen. In den vorgenannten Fällen ist der Auftraggeber vom Wirtschaftsprüfer tunlichst vorher zu hören.

8. Schweigepflicht gegenüber Dritten, Datenschutz

(1) Der Wirtschaftsprüfer ist nach Maßgabe der Gesetze (§ 323 Abs. 1 HGB, § 43 WPO, § 203 StGB) verpflichtet, über Tatsachen und Umstände, die ihm bei seiner Berufstätigkeit anvertraut oder bekannt werden, Stillschweigen zu bewahren, es sei denn, dass der Auftraggeber ihn von dieser Schweigepflicht entbindet.

(2) Der Wirtschaftsprüfer wird bei der Verarbeitung von personenbezogenen Daten die nationalen und europarechtlichen Regelungen zum Datenschutz beachten.

9. Haftung

(1) Für gesetzlich vorgeschriebene Leistungen des Wirtschaftsprüfers, insbesondere Prüfungen, gelten die jeweils anzuwendenden gesetzlichen Haftungsbeschränkungen, insbesondere die Haftungsbeschränkung des § 323 Abs. 2 HGB.

(2) Sofern weder eine gesetzliche Haftungsbeschränkung Anwendung findet noch eine einzelvertragliche Haftungsbeschränkung besteht, ist die Haftung des Wirtschaftsprüfers für Schadensersatzansprüche jeder Art, mit Ausnahme von Schäden aus der Verletzung von Leben, Körper und Gesundheit, sowie von Schäden, die eine Ersatzpflicht des Herstellers nach § 1 ProdHaftG begründen, bei einem fahrlässig verursachten einzelnen Schadensfall gemäß § 54a Abs. 1 Nr. 2 WPO auf 4 Mio. € beschränkt.

(3) Einreden und Einwendungen aus dem Vertragsverhältnis mit dem Auftraggeber stehen dem Wirtschaftsprüfer auch gegenüber Dritten zu.

(4) Leiten mehrere Anspruchsteller aus dem mit dem Wirtschaftsprüfer bestehenden Vertragsverhältnis Ansprüche aus einer fahrlässigen Pflichtverletzung des Wirtschaftsprüfers her, gilt der in Abs. 2 genannte Höchstbetrag für die betreffenden Ansprüche aller Anspruchsteller insgesamt.

(5) Ein einzelner Schadensfall im Sinne von Abs. 2 ist auch bezüglich eines aus mehreren Pflichtverletzungen stammenden einheitlichen Schadens gegeben. Der einzelne Schadensfall umfasst sämtliche Folgen einer Pflichtverletzung ohne Rücksicht darauf, ob Schäden in einem oder in mehreren aufeinanderfolgenden Jahren entstanden sind. Dabei gilt mehrfaches auf gleicher oder gleichartiger Fehlerquelle beruhendes Tun oder Unterlassen als einheitliche Pflichtverletzung, wenn die betreffenden Angelegenheiten miteinander in rechtlichem oder wirtschaftlichem Zusammenhang stehen. In diesem Fall kann der Wirtschaftsprüfer nur bis zur Höhe von 5 Mio. € in Anspruch genommen werden. Die Begrenzung auf das Fünffache der Mindestversicherungssumme gilt nicht bei gesetzlich vorgeschriebenen Pflichtprüfungen.

(6) Ein Schadensersatzanspruch erlischt, wenn nicht innerhalb von sechs Monaten nach der schriftlichen Ablehnung der Ersatzleistung Klage erhoben wird und der Auftraggeber auf diese Folge hingewiesen wurde. Dies gilt nicht für Schadensersatzansprüche, die auf vorsätzliches Verhalten zurückzuführen sind, sowie bei einer schuldhaften Verletzung von Leben, Körper oder Gesundheit sowie bei Schäden, die eine Ersatzpflicht des Herstellers nach § 1 ProdHaftG begründen. Das Recht, die Einrede der Verjährung geltend zu machen, bleibt unberührt.

10. Ergänzende Bestimmungen für Prüfungsaufträge

(1) Ändert der Auftraggeber nachträglich den durch den Wirtschaftsprüfer geprüften und mit einem Bestätigungsvermerk versehenen Abschluss oder Lagebericht, darf er diesen Bestätigungsvermerk nicht weiterverwenden.

Hat der Wirtschaftsprüfer einen Bestätigungsvermerk nicht erteilt, so ist ein Hinweis auf die durch den Wirtschaftsprüfer durchgeführte Prüfung im Lagebericht oder an anderer für die Öffentlichkeit bestimmter Stelle nur mit schriftlicher Einwilligung des Wirtschaftsprüfers und mit dem von ihm genehmigten Wortlaut zulässig.

(2) Widerruft der Wirtschaftsprüfer den Bestätigungsvermerk, so darf der Bestätigungsvermerk nicht weiterverwendet werden. Hat der Auftraggeber den Bestätigungsvermerk bereits verwendet, so hat er auf Verlangen des Wirtschaftsprüfers den Widerruf bekanntzugeben.

(3) Der Auftraggeber hat Anspruch auf fünf Berichtsausfertigungen. Weitere Ausfertigungen werden besonders in Rechnung gestellt.

11. Ergänzende Bestimmungen für Hilfeleistung in Steuersachen

(1) Der Wirtschaftsprüfer ist berechtigt, sowohl bei der Beratung in steuerlichen Einzelfragen als auch im Falle der Dauerberatung die vom Auftraggeber genannten Tatsachen, insbesondere Zahlenangaben, als richtig und vollständig zugrunde zu legen; dies gilt auch für Buchführungsaufträge. Er hat jedoch den Auftraggeber auf von ihm festgestellte Unrichtigkeiten hinzuweisen.

(2) Der Steuerberatungsauftrag umfasst nicht die zur Wahrung von Fristen erforderlichen Handlungen, es sei denn, dass der Wirtschaftsprüfer hierzu ausdrücklich den Auftrag übernommen hat. In diesem Fall hat der Auftraggeber dem Wirtschaftsprüfer alle für die Wahrung von Fristen wesentlichen Unterlagen, insbesondere Steuerbescheide, so rechtzeitig vorzulegen, dass dem Wirtschaftsprüfer eine angemessene Bearbeitungszeit zur Verfügung steht.

(3) Mangels einer anderweitigen schriftlichen Vereinbarung umfasst die laufende Steuerberatung folgende, in die Vertragsdauer fallenden Tätigkeiten:

- a) Ausarbeitung der Jahressteuererklärungen für die Einkommensteuer, Körperschaftsteuer und Gewerbesteuer sowie der Vermögensteuererklärungen, und zwar auf Grund der vom Auftraggeber vorzulegenden Jahresabschlüsse und sonstiger für die Besteuerung erforderlicher Aufstellungen und Nachweise
- b) Nachprüfung von Steuerbescheiden zu den unter a) genannten Steuern
- c) Verhandlungen mit den Finanzbehörden im Zusammenhang mit den unter a) und b) genannten Erklärungen und Bescheiden
- d) Mitwirkung bei Betriebsprüfungen und Auswertung der Ergebnisse von Betriebsprüfungen hinsichtlich der unter a) genannten Steuern
- e) Mitwirkung in Einspruchs- und Beschwerdeverfahren hinsichtlich der unter a) genannten Steuern.

Der Wirtschaftsprüfer berücksichtigt bei den vorgenannten Aufgaben die wesentliche veröffentlichte Rechtsprechung und Verwaltungsauffassung.

(4) Erhält der Wirtschaftsprüfer für die laufende Steuerberatung ein Pauschalhonorar, so sind mangels anderweitiger schriftlicher Vereinbarungen die unter Abs. 3 Buchst. d) und e) genannten Tätigkeiten gesondert zu honorieren.

(5) Sofern der Wirtschaftsprüfer auch Steuerberater ist und die Steuerberatervergütungsverordnung für die Bemessung der Vergütung anzuwenden ist, kann eine höhere oder niedrigere als die gesetzliche Vergütung in Textform vereinbart werden.

(6) Die Bearbeitung besonderer Einzelfragen der Einkommensteuer, Körperschaftsteuer, Gewerbesteuer, Einheitsbewertung und Vermögensteuer sowie aller Fragen der Umsatzsteuer, Lohnsteuer, sonstigen Steuern und Abgaben erfolgt auf Grund eines besonderen Auftrags. Dies gilt auch für

- a) die Bearbeitung einmalig anfallender Steuerangelegenheiten, z.B. auf dem Gebiet der Erbschaftsteuer, Kapitalverkehrsteuer, Grunderwerbsteuer,
- b) die Mitwirkung und Vertretung in Verfahren vor den Gerichten der Finanz- und der Verwaltungsgerichtsbarkeit sowie in Steuerstrafsachen,
- c) die beratende und gutachtliche Tätigkeit im Zusammenhang mit Umwandlungen, Kapitalerhöhung und -herabsetzung, Sanierung, Eintritt und Ausscheiden eines Gesellschafters, Betriebsveräußerung, Liquidation und dergleichen und
- d) die Unterstützung bei der Erfüllung von Anzeige- und Dokumentationspflichten.

(7) Soweit auch die Ausarbeitung der Umsatzsteuerjahreserklärung als zusätzliche Tätigkeit übernommen wird, gehört dazu nicht die Überprüfung etwaiger besonderer buchmäßiger Voraussetzungen sowie die Frage, ob alle in Betracht kommenden umsatzsteuerrechtlichen Vergünstigungen wahrgenommen worden sind. Eine Gewähr für die vollständige Erfassung der Unterlagen zur Geltendmachung des Vorsteuerabzugs wird nicht übernommen.

12. Elektronische Kommunikation

Die Kommunikation zwischen dem Wirtschaftsprüfer und dem Auftraggeber kann auch per E-Mail erfolgen. Soweit der Auftraggeber eine Kommunikation per E-Mail nicht wünscht oder besondere Sicherheitsanforderungen stellt, wie etwa die Verschlüsselung von E-Mails, wird der Auftraggeber den Wirtschaftsprüfer entsprechend in Textform informieren.

13. Vergütung

(1) Der Wirtschaftsprüfer hat neben seiner Gebühren- oder Honorarforderung Anspruch auf Erstattung seiner Auslagen; die Umsatzsteuer wird zusätzlich berechnet. Er kann angemessene Vorschüsse auf Vergütung und Auslagenersatz verlangen und die Auslieferung seiner Leistung von der vollen Befriedigung seiner Ansprüche abhängig machen. Mehrere Auftraggeber haften als Gesamtschuldner.

(2) Ist der Auftraggeber kein Verbraucher, so ist eine Aufrechnung gegen Forderungen des Wirtschaftsprüfers auf Vergütung und Auslagenersatz nur mit unbestrittenen oder rechtskräftig festgestellten Forderungen zulässig.

14. Streitschlichtungen

Der Wirtschaftsprüfer ist nicht bereit, an Streitbeilegungsverfahren vor einer Verbraucherschlichtungsstelle im Sinne des § 2 des Verbraucherstreitbeilegungsgesetzes teilzunehmen.

15. Anzuwendendes Recht

Für den Auftrag, seine Durchführung und die sich hieraus ergebenden Ansprüche gilt nur deutsches Recht.

General Engagement Terms

for

Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften

[German Public Auditors and Public Audit Firms]

as of January 1, 2017

1. Scope of application

(1) These engagement terms apply to contracts between German Public Auditors (*Wirtschaftsprüfer*) or German Public Audit Firms (*Wirtschaftsprüfungsgesellschaften*) – hereinafter collectively referred to as "German Public Auditors" – and their engaging parties for assurance services, tax advisory services, advice on business matters and other engagements except as otherwise agreed in writing or prescribed by a mandatory rule.

(2) Third parties may derive claims from contracts between German Public Auditors and engaging parties only when this is expressly agreed or results from mandatory rules prescribed by law. In relation to such claims, these engagement terms also apply to these third parties.

2. Scope and execution of the engagement

(1) Object of the engagement is the agreed service – not a particular economic result. The engagement will be performed in accordance with the German Principles of Proper Professional Conduct (*Grundsätze ordnungsmäßiger Berufsausübung*). The German Public Auditor does not assume any management functions in connection with his services. The German Public Auditor is not responsible for the use or implementation of the results of his services. The German Public Auditor is entitled to make use of competent persons to conduct the engagement.

(2) Except for assurance engagements (*betriebswirtschaftliche Prüfungen*), the consideration of foreign law requires an express written agreement.

(3) If circumstances or the legal situation change subsequent to the release of the final professional statement, the German Public Auditor is not obligated to refer the engaging party to changes or any consequences resulting therefrom.

3. The obligations of the engaging party to cooperate

(1) The engaging party shall ensure that all documents and further information necessary for the performance of the engagement are provided to the German Public Auditor on a timely basis, and that he is informed of all events and circumstances that may be of significance to the performance of the engagement. This also applies to those documents and further information, events and circumstances that first become known during the German Public Auditor's work. The engaging party will also designate suitable persons to provide information.

(2) Upon the request of the German Public Auditor, the engaging party shall confirm the completeness of the documents and further information provided as well as the explanations and statements, in a written statement drafted by the German Public Auditor.

4. Ensuring independence

(1) The engaging party shall refrain from anything that endangers the independence of the German Public Auditor's staff. This applies throughout the term of the engagement, and in particular to offers of employment or to assume an executive or non-executive role, and to offers to accept engagements on their own behalf.

(2) Were the performance of the engagement to impair the independence of the German Public Auditor, of related firms, firms within his network, or such firms associated with him, to which the independence requirements apply in the same way as to the German Public Auditor in other engagement relationships, the German Public Auditor is entitled to terminate the engagement for good cause.

5. Reporting and oral information

To the extent that the German Public Auditor is required to present results in writing as part of the work in executing the engagement, only that written work is authoritative. Drafts are non-binding. Except as otherwise agreed, oral statements and explanations by the German Public Auditor are binding only when they are confirmed in writing. Statements and information of the German Public Auditor outside of the engagement are always non-binding.

6. Distribution of a German Public Auditor's professional statement

(1) The distribution to a third party of professional statements of the German Public Auditor (results of work or extracts of the results of work whether in draft or in a final version) or information about the German Public Auditor acting for the engaging party requires the German Public Auditor's written consent, unless the engaging party is obligated to distribute or inform due to law or a regulatory requirement.

(2) The use by the engaging party for promotional purposes of the German Public Auditor's professional statements and of information about the German Public Auditor acting for the engaging party is prohibited.

7. Deficiency rectification

(1) In case there are any deficiencies, the engaging party is entitled to specific subsequent performance by the German Public Auditor. The engaging party may reduce the fees or cancel the contract for failure of such subsequent performance, for subsequent non-performance or unjustified refusal to perform subsequently, or for unconscionability or impossibility of subsequent performance. If the engagement was not commissioned by a consumer, the engaging party may only cancel the contract due to a deficiency if the service rendered is not relevant to him due to failure of subsequent performance, to subsequent non-performance, to unconscionability or impossibility of subsequent performance. No. 9 applies to the extent that further claims for damages exist.

(2) The engaging party must assert a claim for the rectification of deficiencies in writing (*Textform*) [Translators Note: The German term "Textform" means in written form, but without requiring a signature] without delay. Claims pursuant to paragraph 1 not arising from an intentional act expire after one year subsequent to the commencement of the time limit under the statute of limitations.

(3) Apparent deficiencies, such as clerical errors, arithmetical errors and deficiencies associated with technicalities contained in a German Public Auditor's professional statement (long-form reports, expert opinions etc.) may be corrected – also versus third parties – by the German Public Auditor at any time. Misstatements which may call into question the results contained in a German Public Auditor's professional statement entitle the German Public Auditor to withdraw such statement – also versus third parties. In such cases the German Public Auditor should first hear the engaging party, if practicable.

8. Confidentiality towards third parties, and data protection

(1) Pursuant to the law (§ [Article] 323 Abs 1 [paragraph 1] HGB [German Commercial Code: *Handelsgesetzbuch*], § 43 WPO [German Law regulating the Profession of Wirtschaftsprüfer: *Wirtschaftsprüferordnung*], § 203 StGB [German Criminal Code: *Strafgesetzbuch*]) the German Public Auditor is obligated to maintain confidentiality regarding facts and circumstances confided to him or of which he becomes aware in the course of his professional work, unless the engaging party releases him from this confidentiality obligation.

(2) When processing personal data, the German Public Auditor will observe national and European legal provisions on data protection.

9. Liability

(1) For legally required services by German Public Auditors, in particular audits, the respective legal limitations of liability, in particular the limitation of liability pursuant to § 323 Abs. 2 HGB, apply.

(2) Insofar neither a statutory limitation of liability is applicable, nor an individual contractual limitation of liability exists, the liability of the German Public Auditor for claims for damages of any other kind, except for damages resulting from injury to life, body or health as well as for damages that constitute a duty of replacement by a producer pursuant to § 1 ProdHaftG [German Product Liability Act: *Produkthaftungsgesetz*], for an individual case of damages caused by negligence is limited to € 4 million pursuant to § 54 a Abs. 1 Nr. 2 WPO.

(3) The German Public Auditor is entitled to invoke demurs and defenses based on the contractual relationship with the engaging party also towards third parties.

(4) When multiple claimants assert a claim for damages arising from an existing contractual relationship with the German Public Auditor due to the German Public Auditor's negligent breach of duty, the maximum amount stipulated in paragraph 2 applies to the respective claims of all claimants collectively.

(5) An individual case of damages within the meaning of paragraph 2 also exists in relation to a uniform damage arising from a number of breaches of duty. The individual case of damages encompasses all consequences from a breach of duty regardless of whether the damages occurred in one year or in a number of successive years. In this case, multiple acts or omissions based on the same source of error or on a source of error of an equivalent nature are deemed to be a single breach of duty if the matters in question are legally or economically connected to one another. In this event the claim against the German Public Auditor is limited to € 5 million. The limitation to the fivefold of the minimum amount insured does not apply to compulsory audits required by law.

(6) A claim for damages expires if a suit is not filed within six months subsequent to the written refusal of acceptance of the indemnity and the engaging party has been informed of this consequence. This does not apply to claims for damages resulting from scienter, a culpable injury to life, body or health as well as for damages that constitute a liability for replacement by a producer pursuant to § 1 ProdHaftG. The right to invoke a plea of the statute of limitations remains unaffected.

10. Supplementary provisions for audit engagements

(1) If the engaging party subsequently amends the financial statements or management report audited by a German Public Auditor and accompanied by an auditor's report, he may no longer use this auditor's report.

If the German Public Auditor has not issued an auditor's report, a reference to the audit conducted by the German Public Auditor in the management report or any other public reference is permitted only with the German Public Auditor's written consent and with a wording authorized by him.

(2) If the German Public Auditor revokes the auditor's report, it may no longer be used. If the engaging party has already made use of the auditor's report, then upon the request of the German Public Auditor he must give notification of the revocation.

(3) The engaging party has a right to five official copies of the report. Additional official copies will be charged separately.

11. Supplementary provisions for assistance in tax matters

(1) When advising on an individual tax issue as well as when providing ongoing tax advice, the German Public Auditor is entitled to use as a correct and complete basis the facts provided by the engaging party – especially numerical disclosures; this also applies to bookkeeping engagements. Nevertheless, he is obligated to indicate to the engaging party any errors he has identified.

(2) The tax advisory engagement does not encompass procedures required to observe deadlines, unless the German Public Auditor has explicitly accepted a corresponding engagement. In this case the engaging party must provide the German Public Auditor with all documents required to observe deadlines – in particular tax assessments – on such a timely basis that the German Public Auditor has an appropriate lead time.

(3) Except as agreed otherwise in writing, ongoing tax advice encompasses the following work during the contract period:

- a) preparation of annual tax returns for income tax, corporate tax and business tax, as well as wealth tax returns, namely on the basis of the annual financial statements, and on other schedules and evidence documents required for the taxation, to be provided by the engaging party
- b) examination of tax assessments in relation to the taxes referred to in (a)
- c) negotiations with tax authorities in connection with the returns and assessments mentioned in (a) and (b)
- d) support in tax audits and evaluation of the results of tax audits with respect to the taxes referred to in (a)
- e) participation in petition or protest and appeal procedures with respect to the taxes mentioned in (a).

In the aforementioned tasks the German Public Auditor takes into account material published legal decisions and administrative interpretations.

(4) If the German Public auditor receives a fixed fee for ongoing tax advice, the work mentioned under paragraph 3 (d) and (e) is to be remunerated separately, except as agreed otherwise in writing.

(5) Insofar the German Public Auditor is also a German Tax Advisor and the German Tax Advice Remuneration Regulation (*Steuerberatungsvergütungsverordnung*) is to be applied to calculate the remuneration, a greater or lesser remuneration than the legal default remuneration can be agreed in writing (*Textform*).

(6) Work relating to special individual issues for income tax, corporate tax, business tax, valuation assessments for property units, wealth tax, as well as all issues in relation to sales tax, payroll tax, other taxes and dues requires a separate engagement. This also applies to:

- a) work on non-recurring tax matters, e.g. in the field of estate tax, capital transactions tax, and real estate sales tax;
- b) support and representation in proceedings before tax and administrative courts and in criminal tax matters;
- c) advisory work and work related to expert opinions in connection with changes in legal form and other re-organizations, capital increases and reductions, insolvency related business reorganizations, admission and retirement of owners, sale of a business, liquidations and the like, and
- d) support in complying with disclosure and documentation obligations.

(7) To the extent that the preparation of the annual sales tax return is undertaken as additional work, this includes neither the review of any special accounting prerequisites nor the issue as to whether all potential sales tax allowances have been identified. No guarantee is given for the complete compilation of documents to claim the input tax credit.

12. Electronic communication

Communication between the German Public Auditor and the engaging party may be via e-mail. In the event that the engaging party does not wish to communicate via e-mail or sets special security requirements, such as the encryption of e-mails, the engaging party will inform the German Public Auditor in writing (*Textform*) accordingly.

13. Remuneration

(1) In addition to his claims for fees, the German Public Auditor is entitled to claim reimbursement of his expenses; sales tax will be billed additionally. He may claim appropriate advances on remuneration and reimbursement of expenses and may make the delivery of his services dependent upon the complete satisfaction of his claims. Multiple engaging parties are jointly and severally liable.

(2) If the engaging party is not a consumer, then a set-off against the German Public Auditor's claims for remuneration and reimbursement of expenses is admissible only for undisputed claims or claims determined to be legally binding.

14. Dispute Settlement

The German Public Auditor is not prepared to participate in dispute settlement procedures before a consumer arbitration board (*Verbraucherschlichtungsstelle*) within the meaning of § 2 of the German Act on Consumer Dispute Settlements (*Verbraucherstreitbeilegungsgesetz*).

15. Applicable law

The contract, the performance of the services and all claims resulting therefrom are exclusively governed by German law.