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EHG Sustainability Report 2025

EHG Stahlzentrum GmbH & Co OG

Company management

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EHG Sustainability Report 2025

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Company management
Arno Rüf
Stefan Girardi

Locations
Dornbirn
Kirchham
Vienna

Size of workforce
~280 employees

Issue
Version 1.0, June 2026

This report contains gender-neutral language throughout.

Now more than ever, sustainability serves as a cornerstone of responsible business practice.


Stefan Girardi

Arno Rüf

General disclosures (ESRS)

Foreword by the company management

Now more than ever, sustainability serves as a cornerstone of responsible business practice – environmentally, economically and socially. As the EHG Group, we consider it our duty to contribute to a future worth living. This responsibility extends far beyond our products and services. It begins with what we do every day of the week, with each and every employee, at all our sites and beyond – and does not end at the company gate, but encompasses our partners, our customers and our entire supply chain.

As a long-established group of companies with strong regional roots and an international outlook, we know that sustainability is not a short-term trend, but an enduring mindset. It is about thinking long-term, acting with foresight and putting people front and centre of everything we do. Our employees are the heart of the EHG Group – their dedication, their ideas and their sense of responsibility play a key role in ensuring not only that we are economically successful, but also that we are consistently able to pursue social and environmental goals. That is why we are committed to a corporate culture characterised by mutual respect, participation, safety and security – now and in the future.

We see our regional presence in the DACH region, as well as in Romania and beyond, as an opportunity to actively contribute to the sustainable development of our locations and regions. This role encompasses everything from supporting local training initiatives and strengthening regional economic cycles to implementing targeted measures to reduce our environmental footprint – and is one we embrace with conviction.

In our fourth voluntary sustainability report, we aim to provide transparency regarding the steps we have taken so far. Our decision to systematically document and further develop our sustainability strategy goes back to the 2022 financial year, and this report provides an insight into our goals and progress, as well as the challenges we face – openly, transparently and based on facts. The key performance indicators are summarised at the end of the report and digitally linked for ease of reference.

We strongly believe that the path to greater sustainability is one we can only walk together. That is why management and staff are working hand in hand to achieve the ambitious goals we have set ourselves – with expertise, responsibility and a keen focus on what really matters.

This report contains gender-neutral language throughout.

Arno Rüf | Stefan Girardi

Sustainability is not a short-term trend, but an enduring mindset.

EHG Stahlzentrum GmbH & Co OG | Dornbirn | AT

Business activities

EHG STAHLZENTRUM GmbH & Co OG is a wholesale company founded in 1963 and based in Dornbirn. The company, which is wholly privately owned, is one of the largest in its sector in Austria.

With the best-stocked warehouse in Central Europe, stocks weighing in at around 65,000 tonnes and over 20,000 items, we provide bespoke solutions to meet the requirements of our customers – steel and metal-processing companies, primarily from the commercial and industrial sectors. In all, the multinational EHG Group has 12 sites in Austria, Germany, Switzerland and Romania, which together service the needs of EHG's relevant sales markets in Europe.

The EHG Group's 500 employees hold one key thing in common: they take the initiative, think outside the box and are always willing to challenge the status quo. Working well means working together. That is why, at EHG, we place the greatest value on internal and external collaboration and shared respect, regardless of role and position.

We are highly efficient and achieve some of the best performance indicators in the sector. This requires ongoing enhancements to our processes and technologies and the continuous reviewing of our services.

Key differentiators that extend beyond traditional trade in steel include such core competencies as:

Prefabrication	Sawing, blasting, conserving, washing, barrel finishing and deburring.
Warehouse	Extensive range, with some customer-specific products held in stock.
Logistics	A modern and environmentally friendly fleet, HGVs equipped with unloading aids, fixed delivery times in the core region and customised delivery dates.
E-business	Online shop, EDI connections.
EHG Complete	Outsourcing of warehousing and processing services from customers to EHG, with digitalised order processing.

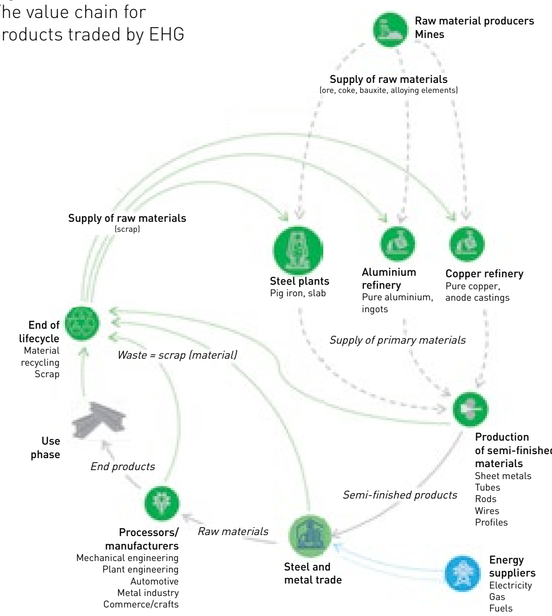
EHG aims to remain a leading provider and industry leader in our core markets. We strive to be a reliable and profitable partner for our target groups – steel and metal-working companies from heavy industry, commerce, crafts and trade.

The quality management system operated by EHG Stahlzentrum GmbH & Co OG was first certified in accordance with the requirements set out in the ISO 9001 standard in 1994 and has been continuously developed ever since. The procedure employed for monitoring supply chains is the responsibility of QM management and serves to ensure an impartial assessment through independence from the purchasing departments.

Materiality analysis

An analysis of the EHG value chain was conducted in 2024 to serve as the basis for the materiality analysis. This was developed in collaboration with members of the Wirtschaftsverband Großhandel Metallhalbzeug e.V. (WGM – the professional association for distributors and processors of semi-finished metal products) and as such with the involvement of key industry stakeholders such as manufacturers, suppliers and customers. A simplified illustration in Figure 1 looks closely at the material flow. Based on the value chain, the framework and template for a dual materiality analysis were also developed in collaboration with other WGM members. Due to the omnibus amendments at EU level in 2026, large companies are now the only ones directly subject to mandatory reporting, meaning that the EHG sustainability report continues to be published on a voluntary basis.

Figure 1:
The value chain for products traded by EHG



In accordance with the EU Commission's official recommendation of 30 July 2025, our intention is to align our reporting with the VSME standard (Voluntary Sustainability Reporting Standard for SMEs) going forwards. The content of this EHG sustainability report may differ from these requirements and will be gradually adapted to the standard in subsequent versions.

With reference to the stakeholders identified in the quality management system, the management team – together with a working group – selected the most relevant topics and key performance indicators for this sustainability report and provided a concise description of them.

In line with the materiality principle, this report aims to document the current status of our sustainability work. It contains the information necessary to understand our company's sustainability performance and reflects the significant economic, environmental and social impacts of our company.

Supported initiatives

The UN Global Compact, a global initiative for sustainable business practices, the International Bill of Human Rights and the United Nations Convention against Corruption form the basis of the EHG code of conduct.
The EHG Group adheres to the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, as well as international human rights provisions, and strictly rejects any form of modern slavery.

As a long-term goal, the EHG Group is pursuing climate neutrality by 2050 and assesses its planned investments and initiatives in light of this aim.

Locations

Location	Dornbirn
Address	EHG Stahlzentrum GmbH & Co OG | Wallenmahd 54 | 6850 Dornbirn | Austria
Contact	Tel. +43 5572 391-0 | dornbirn@ehg-stahl.com
Employees	~250
Sector	NACE code G 46.721 Wholesale of ores, steel and semi-finished products
Purpose of the facility	The location of EHG's headquarters in Dornbirn is primarily used for the storage and processing of purchased steels and non-ferrous metals. Structures on the site comprise several warehouses and three office buildings, as well as an underground car park and a petrol station. The warehouses encompass storage floor space, automated high-bay racking systems and cranes, as well as band saws and circular saws for cutting the goods to size.

Location	Kirchham
Address	No. 33a | 4656 Kirchham | Austria
Contact	Tel. +43 7619 27075-2620 | kirchham@ehg-stahl.com
Employees	3
Sector	NACE code G 46.721 Wholesale of ores, steel and semi-finished products
Purpose of the facility	The premises rented in Kirchham serve solely as a sales office without warehouse facilities. The site is integrated into Dornbirn's management systems and processes and, due to its small size, is not treated separately.

Location	Vienna
Address	Leopold-Böhm-Strasse 10, Ebene D, Top D49-D51 | 1030 Vienna | Austria
Contact	Tel. +43 1 2033151 – 2640 | wien@ehg-stahl.com
Employees	2
Sector	NACE code G 46.721 Wholesale of ores, steel and semi-finished products
Purpose of the facility	The premises rented in Vienna serve solely as a sales office without warehouse facilities. The site is integrated into Dornbirn's management systems and processes and, due to its small size, is not treated separately.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Governance (ESRS)

Our governance continues to be guided by a prudent warehousing and procurement policy, a focus on assuring delivery capability and continuous efforts to optimise our working capital. Ensuring liquidity, controlling costs and ongoing monitoring of market and pricing trends continue to serve as key control parameters.

Strategic initiatives in the areas of digitalisation, process optimisation and sustainable alignment of the value chain also continue to move ahead following the successful migration to the new ERP system on 1 January 2026. The structural transformation within the steel industry can and will lead to changes in market conditions over the medium term. Based on our current perspective, the specific impacts this will have on margins, pricing structures and competitive pressure cannot be estimated with any certainty.

The EHG code of conduct defines the basic principles for our conduct and correct corporate behaviour within the EHG Group. It is an expression of our company values, and at the same time this code of conduct is the basis for relationships with our partners and the public. The principles in this code are based on the UN Global Compact, a worldwide initiative for responsible business management.

Responsibility for compliance lies with management and is not currently exercised by a designated individual or department. Following an external compliance audit, a legal register pertaining to EHG was created as part of the QM system and this is updated twice a year. Product standards are also managed and automatically updated within the QM system and shared across the company via a group licence.

The formal appointment of designated officers clarified our employees' responsibilities in relation to compliance with legal requirements. Job descriptions are stored digitally in the Personio HR system and reviewed or updated where necessary during annual performance reviews.

Communication with staff and raising their awareness in relation to key sustainability issues takes place via the company's own intranet portal, EhGON (EHG Online).

Regulatory developments in the area of sustainability, particularly with respect to European reporting obligations and targets set out in climate policy remain a significant factor influencing investment decisions along industrial value chains. The timing and specific features of individual measures have the potential to impact market and cost structures.

Risk management and internal control (ESRS G1)

During the course of its business activities, the company is exposed to various risks that are inextricably linked to its operational activities in the steel trade. Its risk management approach is geared towards identifying risks at an early stage so they can be evaluated and mitigated by means of appropriate measures. As a general rule, risks are only taken within the scope permitted by the company's organisational and financial performance.

The entire procurement and distribution process is subject to a documented quality management system certified to ISO 9001:2015 in order to guarantee the quality of products and processes. This ensures that defined quality standards are upheld across the value chain.

Supply chain risks

Procurement risks arise in particular in the context of potential supply disruptions, pricing changes and geopolitical developments. The company aims to work with a diverse range of suppliers in order to mitigate these risks. Dependence on single sources of supply is reduced by partnering with a number of well-established suppliers. This is accompanied by ongoing monitoring of the market, supplier quality evaluations and medium to long-term supply contracts – where feasible from a business perspective.

Current restrictions to logistics routes, primarily due to unsafe shipping lanes, have a negligible direct impact on our product range and its availability. However, the fact that the entire branch is fundamentally dependent

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on global imports in certain product segments makes it vulnerable to disruptions resulting in increases to insurance and transportation costs, and therefore product prices. While supply shortages due to geopolitical events have the potential to lead to significant short-term increases in steel prices, these concerns are outweighed by the risks posed by weak overall demand in the European market at present.

Previously, disruptions to individual sources of supply, including the indirect effects of geopolitical developments, have largely been compensated for by drawing on alternative sources of supply. Our ability to deliver to customers was maintained at all times during the reporting period.

The regulatory requirements, import duties and trade barriers introduced and planned by the EU and third countries with the objective of preventing market distortion and price dumping will mainly begin to have an effect on pricing and availability in 2026.

At present, it is difficult to predict the extent to which this will result in a change to commodity flows, such that European supply chains take a more prominent role. However, it is also clear that these factors, while likely to stabilise prices, are also set to have a price-inflationary effect, e.g. due to the new CBAM costs incurred in the form of carbon certificates and the associated import duties.

Our goal is to ensure a stable, reliable supply for our customers even in the face of demanding market conditions. In the same vein, our current inventories are being adjusted accordingly, particularly for items we stock for our key accounts.

EHG is dependent on a single supplier for only a very small number of products, as there is no second manufacturer for these products. It is therefore generally possible to turn to alternative suppliers and use standardised products. As such, our customers are not dependent on EHG and, in the event of an operational failure, would be able to resort to other retailers or suppliers – thereby minimising their own supply risk.

Since 2022, an additional risk assessment has been carried out on key suppliers with a turnover exceeding €250,000, further to the annual supplier assessment. This added risk assessment is based on an abstract country and sector risk, which is supplemented by a supplier-level assessment for high-risk suppliers. In the 2026 financial year, we will continue to focus on our code of conduct for suppliers, which we will require our suppliers from third countries (non-EU) to adhere to.

Risks of human rights violations in the supply chain – particularly on the supplier side and in raw material extraction – cannot be dismissed due to the diversity of global sourcing channels: a lack of transparency regarding the exact origin of raw materials and the conditions under which they are extracted mean that this risk is almost impossible to control despite the utmost caution. Through the automated monitoring of negative reports concerning our suppliers and manufacturers on social media, we aim to identify potential violations or problem areas so that we can implement appropriate measures, including the suspension of suppliers. In addition, we mitigate general country risks by sourcing primarily within the EU, where availability permits this.

To enable the anonymous reporting of potential human rights violations, suspected cases or other legal infringements and breaches of our code of conduct, EHG has maintained a group-wide reporting platform since July 2023. The solution implemented by Flustron satisfies the legal requirements of the whistleblower protection act (HinweisgeberInnenschutzgesetz) and enables internal and external individuals to report any suspected cases to EHG anonymously via an external server. Associated internal responsibilities and the process itself are described in the QM system.

Alongside EHG's extensive fleet of 24 HGVs complying with the Euro 6 emission standard, the company also maintains long-standing partnerships with several freight forwarding companies. Any potential shortfalls in EHG's own fleet are also covered by trusted freight forwarding partners. Thanks to preferential procurement within Europe and sufficient lead times, shortages in sea freight have only a minor impact on security of supply.

Market risks

The overall economic development anticipated in the DACH region has recently become subject to substantial uncertainty due to the latest escalation in the Middle East, and particularly the war in Iran. These effects are amplified in the energy-intensive steel industry. Significant increases in natural gas and electricity prices due to disrupted oil and LNG supply chains are causing production costs to rise substantially, with simultaneous increases in transport and logistic costs and impaired supply chains placing additional pressure on margins. The actual effects this will have can only be predicted to a limited degree at present and primarily depend on the conflict's duration and associated direct impacts on energy prices.

This is being exacerbated by a slow-down in sales due to weaker overall economic demand and a reluctance to invest in key customer industries such as the building, mechanical engineering and automotive industries. Essentially, as things currently stand, the DACH region is expected to see a moderate economic rebound compared to last year, although this currently remains highly uncertain depending on how global geopolitical conflicts develop. Other factors are also a cause for uncertainty in the context of EU trade measures (particularly in relation to import quotas and duties on steel and aluminium products), which could have both a positive and negative effect on market conditions. These have the potential to significantly impact the flow of trade, price levels and investment decisions.

In terms of sales, the risk of over-reliance on individual customers is counteracted by having a broad and diversified customer base, and cluster risks are not a significant factor. The largest customer accounts form around 4.2% of total turnover.

'Green and low-carbon steels' are becoming increasingly important in the market, even though there is currently no universally accepted definition or specification for these materials. In general terms, it is expected that the demand for low-carbon products will increase in the medium to long term, and that conventional steels and metals produced in blast furnaces will be displaced from the market as soon as sufficient supply is available from manufacturers.

This switch to low-carbon steels carries a certain risk, as market demand and availability are difficult to predict, and excess or insufficient stock levels can have a negative impact on tied-up capital and turnover. Due to EHG's limited storage capacity, it is currently not feasible for EHG to maintain separate stock levels of conventional and low-carbon steels and metals on a large scale; moreover, such an approach would not be economically viable.

Operational risks (EHG)

The area of information technology is subject to risks relating to system availability, integrity and security. Regular system updates as well as ongoing adaptations in light of technological developments are carried out to mitigate these risks. A high-availability solution with back-up infrastructure is in place for key systems to ensure that essential business processes will remain up and running in the event of system downtime. Detailed IT risks have also been documented and assessed in the QM system since 2025.

Migration to the new ERP system eNVenta at Dornbirn was completed at the start of the 2026 financial year. The previous migration implemented at other EHG sites has standardised processes across the group and brought them into line with current legal and industry standards, whilst also providing valuable experience for the implementation at the largest site in Dornbirn. This phased migration and adaptation made it possible to minimise the risk of prolonged downtime or significant delivery delays for customers, and allowed the implementation to go ahead without significant disruption.

Comprehensive documentation for the new ERP system has been created in Help&Manual, which is accessible to all employees online to provide support and serve as a training resource. This is kept up to date by the departments and makes it easier for new employees to settle into day-to-day work routines and familiarise themselves with processes at EHG.

Older operating equipment is replaced on an ongoing basis to ensure reliable processes and avoid a subsequent backlog of investment. Almost all sawing orders can be processed on multiple machines, which helps to offset downtime and bottlenecks on individual ma-

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chines, while downtimes and machine failures are further minimised by an extensive on-site stock of spare parts, as well as a service contract with our main supplier of saws and high-bay racking systems. In summer 2025, a general overhaul (retrofit) of our stainless steel high-bay warehouse, including the guide rails, took place to ensure trouble-free operation over the coming years. A general overhaul (retrofit) is planned for our sheet metal high-bay warehouse in 2026. The total investment budget for 2026 is EUR 4.2 million.

Operational failures are covered by business interruption insurance. For direct and indirect losses attributable to our products, we hold public liability and extended product liability insurance with maximum cover of €500,000.

The most recent comprehensive internal audit of all operational facilities, carried out in 2023 in accordance with Section 82b of the Gewerbeordnung (GewO; Trade Regulation Act), helps us effectively satisfy the regulatory requirements and safety standards.

Full refurbishment of the main distribution room for the low-voltage supply across the entire site will be completed in the second quarter of 2026, bringing it up to the latest technical standards. This will enhance the safety of the distribution systems and with it operational reliability at the Dornbirn site.

We do not anticipate any direct impact or only a negligible impact on the EHG site in Dornbirn resulting from climate change. The site is not at risk from severe weather and is located in a socially and politically stable region. Indirect impacts, such as migration flows caused by climate change and the associated effects on the market, also appear to be rather marginal – at least from the current perspective.

The primary source of personnel risks is the structural skills shortage in the DACH region. To ensure continuity in terms of staffing, the company puts in place compensation systems that are in line with or above market rates, has a wide range of initiatives aimed at increasing its attractiveness as an employer and provides targeted professional training for employees holding key positions.

Financial risks

The financial instruments reported on the annual financial statement are subject to the company's structured risk management framework, which aims to mitigate default, liquidity, currency and other financial risks in the course of its business activities.

Credit risk primarily arises from trade receivables and is limited by a systematic receivables management approach including ongoing credit assessments, defined credit limits and timely monitoring of outstanding invoices. Value adjustments are carried out when relevant risk disclosures are made.

Due to its business activities in the DACH region and individual international business relationships, the company is exposed to foreign currency risks to a limited extent, particularly in conjunction with transactions in Swiss francs (CHF). Foreign currency sales and expenses reduce risk to a certain extent, and trends in exchange rates are monitored on an ongoing basis.

Liquidity risk is mitigated based on rolling liquidity planning as well as credit lines with long-term guarantees. Adequate liquid assets as well as undrawn committed credit lines were available as of the reporting date. The liquidity reserves – defined as cash plus committed, undrawn credit facilities – are continually monitored and adjusted in line with financing requirements.

Changes in interest rates pose a risk in conjunction with floating-rate financing. The effects of interest rate changes are taken into account in financial planning.

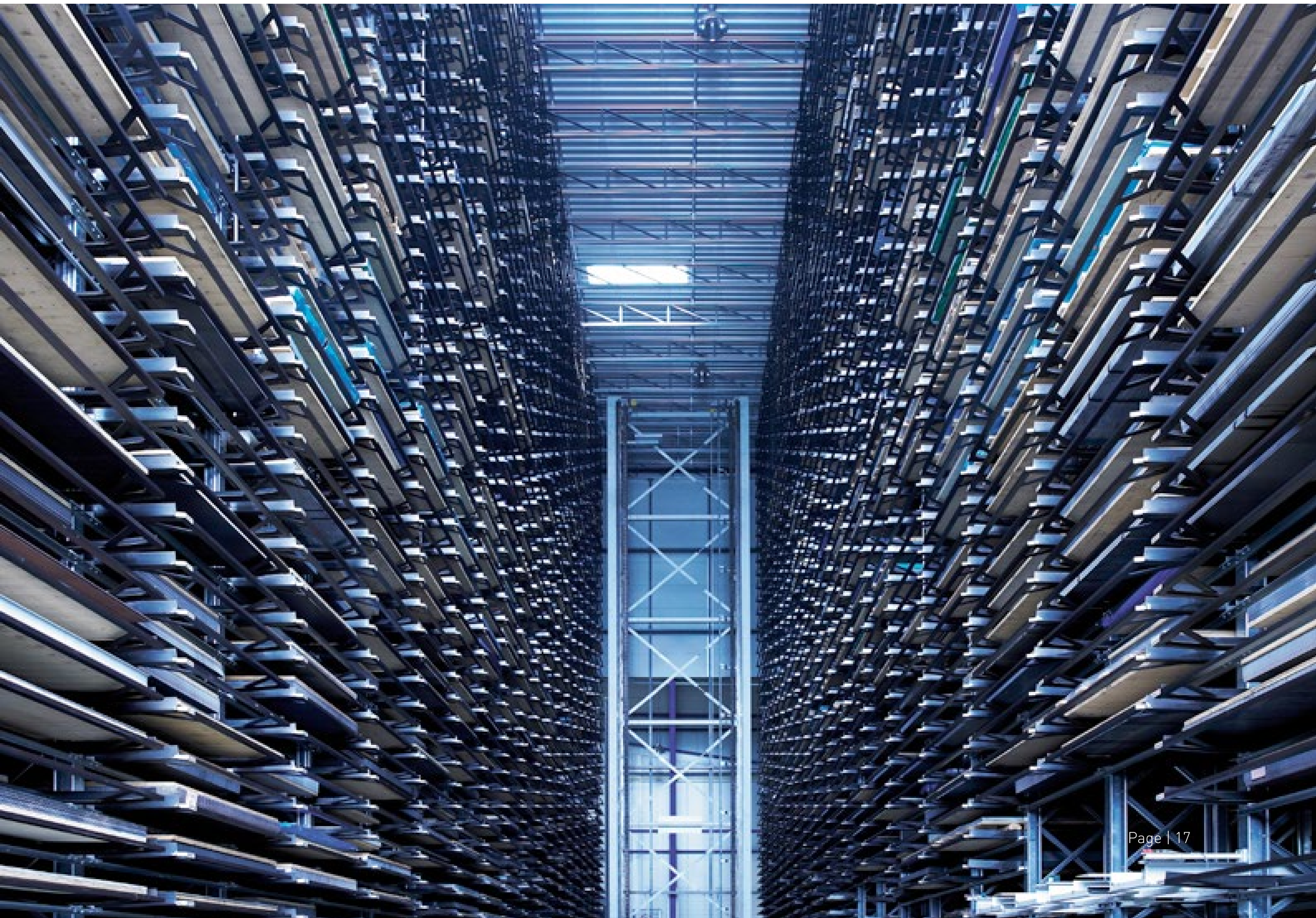
As things currently stand, there are no other significant risks due to pricing changes, default, liquidity or cash flow beyond those set out in the annual financial statement and attachment.

At the time of preparation of the management report, there are no discernible risks that could pose a threat to the company's existence by significantly impairing its assets, financial position or profit situation.

Our management report and financial conduct are audited by auditors Audit Partner Austria Wirtschaftsprüfer GmbH in Vienna.

Measures G1

Measure	Description	Timeframe
Legal register	Half-yearly update of the legal register for all relevant laws at the Dornbirn site	Ongoing
Standards database	Automatic update of relevant standardsin the QM system	Ongoing
Whistleblower platform	Implementation of the whistleblower policy by setting up a group-wide reporting platform (Flustron)	Since 2023
Security audit Active directory	External IT security audit focusing on user management (active directory)	12 / 2023
Audit per Section 82b GewO	Completion of the internal audit of all operational facilities and notifications in accordance with Section 82b GewO	02 / 2024
Retrofit of stainless steel high-bay warehouse	General overhaul (retrofit) of stainless steel high-bay warehouse to prevent downtime	08 / 2025
Retrofit of sheet metal high-bay warehouse	General overhaul (retrofit) of sheet metal high-bay warehouse to prevent downtime	12 / 2026
IT security manual	Implementation of an IT security manual to ensure protection against IT failures.	2026



Business conduct (ESRS G2)

Detailed information regarding business practices and conduct is set out in EHG's annual report and is not repeated here. Only the most important initiatives and assessments from this report have been included below.

Generally speaking, the 2025 financial year was characterised by market conditions that were tepid on the whole but less volatile than those seen in previous years. Significant factors influencing this included a slow-down in demand in key customer industries, a higher structural cost base as well as ongoing geopolitical and regulatory conditions.

Import pressure from third countries continued to be a factor. EU trade measures as well as the progressive implementation of the Carbon Border Adjustment Mechanism (CBAM), which entered fully into force on 1 January 2026, partially compensated for these factors in advance but failed to have a more far-reaching effect due to continued weak demand.

Measures G2

Measure	Description	Timeframe
ERP introduction at Aichach	Introduction of eNVenta as the new ERP system at the EHG site in Aichach	01 / 2024
ERP introduction at Heubach	Introduction of eNVenta as the new ERP system at the new EHG site in Heubach	05 / 2024
ERP introduction at Baienfurt	Introduction of eNVenta as the new ERP system at the new EHG site in Baienfurt	08 / 2024
ERP introduction at Dornbirn and Altstätten	Migration of the EHG sites in Dornbirn and Altstätten	01 / 2026
Implementation of sustainability reporting (CSRD)	On hold as EHG is not required to report under current legislation	No reporting obligation
Implementation of the taxonomy regulation	On hold as EHG is not required to report under current legislation	No reporting obligation

Environment (ESRS)

Climate change (ESRS E1)

Primary steel production using blast furnaces is particularly carbon-intensive. Around 28% of Germany's total industrial carbon emissions are generated during steel production. A large proportion of these carbon dioxide emissions is caused by the combustion of coke during the production process. Further relevant emissions are attributable to the use of electricity generated from fossil fuels. The steel industry therefore ranks among the most energy-intensive industries.

Determining the product carbon footprint (PCF) across the supply chain presents a challenge. As a retailer, EHG is largely dependent on information from upstream actors and processes, which is currently rarely available or shared. In order to provide our customers with reliable information about the product carbon footprint, we employ a transparent calculation method. Until reliable figures for the product carbon footprint are available from suppliers, we will continue to use the typical CO_2 values published by the EU in the context of CBAM as the basis for internal calculations. These are available for all major countries of EHG suppliers, with an average having been calculated for EU member states.

The EU's carbon border tax (or Carbon Border Adjustment Mechanism (CBAM)) also has administrative implications for EHG. This is true in particular for imports from India, which we currently still handle ourselves within our stainless steel range, whereby the measures required in order to comply with reporting obligations in 2024 have been implemented. On 6 November 2025, EHG Stahlzentrum GmbH & Co OG was granted the status of authorised CBAM declarant by Austria's Federal Ministry of Finance (BMF).

Most products from non-EU countries are imported by the foreign manufacturers themselves and delivered 'duty-paid', or we purchase them via EU import companies, known as traders. The obligation to register lies with the customs declarant, which is why EHG endeavours to avoid acting as the customs declarant in the customs documents. The aim of EHG remains to achieve this with as many trading partners as possible.

Since 2021, the Dornbirn site has been powered exclusively by renewable energy sources, meaning that the site does not produce any carbon emissions and generates no radioactive waste. Its reliance on the external supply of electricity has reduced by approximately 11% following the installation of the site's own photovoltaic system. Last year, the PV system installed in Dornbirn produced a total of 260 MWh of electricity, of which 96% was used on-site, while the remaining 11,038 kWh was fed into the public grid and therefore sold.

The external energy audit, which is conducted every four years, took place once again in the 2024 financial year. The resultant recommended further measures for optimising energy consumption are being implemented on a step-by-step basis.

The planned PV system at the new site in Aichach was installed during the construction work, with commissioning taking place in spring 2025. There are no plans to install a photovoltaic system at the Heubach site for economic reasons.

The lighting systems in buildings E and G at the Dornbirn site use energy-saving LED bulbs. In building H, the top two floors have already been switched to LED lighting, with the remaining areas of the building set to follow during 2026.

The work to replace boilers and fit a new cooling unit in building E is expected to be completed in spring 2026. Both of these initiatives will help to improve energy efficiency and thus reduce emissions.

The use of hydrotreated vegetable oil (HVO) diesel could reduce diesel-related emissions by up to 90%. However, as most of our forklift trucks are unable to run on HVO diesel, a partial switch to HVO diesel just for HGVs is not without risk. Economic factors mean it is not possible to make this switch at the present time.

Far-reaching changes to the production process are required in order to make carbon savings in the steel industry. In what is known as 'direct reduction' – a process that

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is set to be used in future for the production of green or low-carbon steel – hydrogen (or natural gas on a transitional basis) is used as a reducing agent. Like scrap metal, the sponge iron produced in this process can be subsequently melted down in an electric arc furnace using electrical energy and processed into steel.

A shift in the products traded by EHG depends largely on availability on the supplier side. Alongside targeted procurement, the recycling of scrap waste collected by EHG is the only direct and significant factor influencing the upcoming transition in the steel industry.

Measures E1

Measure	Description	Timeframe
Renewable energy	Electricity sourced exclusively from renewable energy sources	From 2021
Operation of a photovoltaic system in Dornbirn	In-house photovoltaic system with a capacity of 362 kWp on the roofs of the EHG site in Dornbirn	From 03 / 2023
CO_2 transparency	Standardisation of the calculation of carbon emissions for Scope 1 and 2	2023
Energy audit	Energy audit conducted by an external service provider, including assessment of the current situation and specific recommendations	Q4 / 2024
Implementation of CBAM regulation	Status of approved CBAM declarant granted by BMF as of 6/11/2025	Q4 / 2025
Commissioning of the Aichach PV system	Commissioning of the photovoltaic system at the new EHG site in Aichach	Q1 / 2025
Evaluation of HVO diesel	Evaluation of the use of HVO diesel for HGV fleet carried out, yet to be implemented	Q2 / 2025
Boiler replacement, building E	Boilers replaced in building E for improved energy efficiency	Q1 / 2026
Cooling unit replacement, building E	Cooling unit replaced in building E for improved energy efficiency	Q1 / 2026
Switch to LED lighting	Plans are in place to convert the lighting system in building H from fluorescent lamps to more energy-efficient LED lighting.	Q4 / 2026

Pollution (ESRS E2)

In line with our environmental policy, one of our primary objectives is to prevent waste and minimise the use of resources, raw materials and energy insofar as possible. Through a well-thought-out and documented waste management strategy, we aim not only to prevent waste but also to ensure that the greatest possible proportion of waste is recycled in a way that conserves resources. In the last financial year, the proportion of waste recycled as raw materials stood at 97%.

The EHG fleet is being continually updated, with a focus on minimising emissions caused by our HGVs. All 24 HGVs meet the EEV emission standard (Euro 6). Regular training courses instruct our fleet employees on how to drive economically and focus in particular on reducing fuel consumption and lowering emissions. Special evaluation and route planning software reduces driving distances and analyses optimisation potential in driving behaviour.

The paints used by EHG for the preservation of blasted steel are water-soluble and contain no environmentally harmful perfluoroalkyl and polyfluoroalkyl substances (PFAS).

EHG sees the prevention of radioactive waste as a key sustainability objective, given the long-term consequences of a lack of recycling and the risks to the environment and humankind associated with the final disposal of spent fuel elements. Specifically with regards to our own energy consumption, we manage without nuclear energy by using renewable energy sources, thereby preventing the generation of radioactive waste – at least indirectly.

Hazardous waste accounts for 1.1% of the total volume of scrap, primarily arising from oil-contaminated water and the disposal of batteries and light bulbs, with over 99% of this being sent for material or thermal recovery.

Measures E2

Measure	Description	Timeframe
PFAS-free additives	Use of PFAS-free additives only	Ongoing
Driver training	Fuel and emissions reduction through targeted driver training	Ongoing

Water and marine resources (ESRS E3)

In 2025, EHG's water consumption totalled 3,166 m^3 and was used primarily for lubricating saw blades, cleaning circulation tanks, preserving blasted parts and supporting building services that require additives.

The vast majority of the water consumed can be discharged untreated via the sewage system; less than 1% of the water consumption is collected via oil separators and disposed of as oil-contaminated water. After disposal, this oil emulsion is processed in a chemical-physical treatment plant (CPTP) and the emulsion is separated by flocculation. The oil fraction recovered in this way – amounting to around 4% of the input volume – is then returned to a refinery for material recovery. The separated water, which accounts for around 95% of the separated emulsion, is fed into the sewage treatment plant, while the remaining separated solids are subsequently sent to a downstream thermal recovery plant.

The classification of solid lead as 'very toxic to aquatic life with long-lasting effects' under the EU CLP Regulation, effective from 1 September 2025, has direct implications for the market and for EHG. As a result of this classification, lead and alloys containing lead above a certain content will be classified in the future as falling under the Seveso Directive and as 'dangerous substances'. This will result in stricter requirements, including stipulations regarding the storage and transport of lead raw materials. Manufacturers and processors of these alloys must therefore prepare for increased requirements and the associated costs and investments.

Semi-finished products, such as bars, tubes, sheets and profiles, etc., are generally not subject to the CLP classification rules. The regulation focuses on intermediate products, which means that the stricter requirements for storage and transport do not apply to semi-finished products. However, the lead content must also be considered in the classification of waste (e.g. swarf), although current estimates indicate that this would have no direct impact on the EHG Group.

Some suppliers have already announced that they wish to avoid the costs and effort associated with this change and are therefore switching to lead-free alloys. EHG views this transition as an opportunity and is proactively working to drive forward the switch to lead-free alternative alloys among its customers.

Measures E3

Measure	Description	Timeframe
Water treatment using CPA	Collection and treatment of waste water containing oil emulsion with the CPA method at the disposal facility	Ongoing
Switch to lead-free products	Engaging with the market to encourage customers to switch to alternative, lead-free products at an early stage	Ongoing

Biodiversity and ecosystems (ESRS E4)

Steel production sometimes has a significantly negative impact on sensitive ecosystems, primarily due to the extraction of raw materials. It is practically impossible for the EHG Group to influence the extraction conditions and sources of raw materials; at best this is indirectly possible through the selection of suppliers, with marginal effects.

The EHG Group has long given preference to European suppliers. In addition to the higher quality standards and stricter environmental regulations at European plants, this has positive effects in particular due to shorter transport distances. Furthermore, we assume that, due to applicable laws and regulations, European suppliers also pay greater attention to the supply chain and as such to raw material sources and mining conditions.

Given that some products and grades are not manufactured or supplied by any European plants, it is sometimes necessary to supplement the product range with goods from suppliers based in third countries. Generally speaking, it is not possible to confine procurement exclusively to Europe, partly due to the origin or scarcity of certain raw materials.

The raw materials used by EHG are not subject to the Deforestation Regulation (EUDR) adopted by the EU.

Measures E4

Measure	Description	Timeframe
Sourcing in Europe	Sourcing from European suppliers with stricter environmental standards and shorter transport routes	Ongoing

Resource use and circular economy (ESRS E5)

Steel is a particularly sustainable material that can be recycled indefinitely without any loss of quality. As a result, it outperforms other materials and saves millions of tonnes of ore, coal and other resources worldwide.

Thanks to effective waste separation, 97% of the waste generated at EHG was sent for material recycling, and only 0.1% was consigned to landfill. The remaining approx. 3% was sent for thermal recycling. In 2025, the recycling of EHG's waste in Dornbirn therefore saved approx. 5000 tonnes of CO_2 equivalent (compared to the use of primary raw materials).

EHG participates in the ARA collection and recycling system, in accordance with the applicable packaging ordinance. The quantities of commercial packaging placed on the market are recorded and reported, and the corresponding licence fee is paid. On request, our customers receive a statement confirming that their obligations have been satisfied.

A system participant audit of EHG Dornbirn for the 2024 financial year is being carried out in 2026 on behalf of the Non-Profit Packaging Coordination Office (VKS) in relation to the ARA collection and recycling system.

Measures E5

Measure	Description	Timeframe
Waste separation and recycling	97.5% material recycling of waste	Ongoing
Exempt packaging	All purchased packaging is licensed by ARA and exempt	Ongoing
Waste management plan	Waste disposal and prevention in accordance with the defined waste management plan	Ongoing
System participant audit by the VKS	System participant audit for 2024 by PwC auditing on behalf of the VKS Packaging Coordination Office	Q1 / 2026

Social (ESRS)

Own workforce (ESRS S1)

Our employees are the cornerstone of our success, which is why we intend to place greater emphasis on staff training. A modular programme of continuing professional development is being devised under the name EHG Campus, for new employees and long-serving specialists alike, designed to impart the necessary skills and build on them over the years. The programme encompasses a broad range of disciplines, with our in-house expertise enhanced by the contributions of external specialist trainers. The first modules were launched in autumn 2023, and the programme is set to be expanded over the coming years based on this experience.

EHG is a training company recognised by the state of Vorarlberg, underscoring the importance the company places on training young people. A rotation programme gives apprentices the opportunity to gain insights into different areas of the business, while additional visits to suppliers and customers take place several times a year, enabling apprentices to exchange experiences with one another and gain valuable insights into the manufacture and use of our products. Apprentice outings and other initiatives (such as an Erasmus exchange for apprentices in 2025) also allow apprentices to develop their social and creative skills.

Employees other than those in the warehouse have the option of working flexible hours in consultation with their supervisor under a flexitime arrangement. As of 2026, every employee can also request an additional (sixth) week of holiday under defined conditions and with a 1/52 pro-rata reduction in salary.

All employees in Dornbirn have access to a social area in the canteen and a freshly cooked lunch subsidised by the company, with meals focused on regional and fresh ingredients, short transport routes and value creation within the region. The social area offers opportunities to meet up with colleagues during staff free time and to participate in activities together such as playing pool, table football and darts.

A company doctor and the occupational health team ensure a safe and healthy working environment, while an independent assessment of safety risks is carried out by an external safety expert from the BWK safety technology centre in Dornbirn. Workstations are designed for ergonomics and office desks are height adjustable.

All staff are invited to take part in the annual outing or family day and the end-of-year party, and further group activities such as skiing days, motorbike trips or other departmental events are organised throughout the year. Retired EHG staff also have the opportunity to use the canteen and get involved in events. Long-serving employees are honoured annually with a special celebration, receive awards and are featured on the company's intranet pages, and once a year the children of our employees have the opportunity to shadow their parents at work as part of a 'bring your child to work' day.

As at 31 December 2025, EHG employed three people with disabilities who were fully integrated into day-to-day working life; according to the prescribed counting method, these are the equivalent of five disabled employees. Unfortunately, it was not possible to meet the statutory quota of 10 disabled employees in the last financial year.

Greater emphasis is being placed on the workplace health promotion programme (BGF) starting in 2026, which is being managed by the HR team in a project called 'ehg'sund'. In addition to coordinating and building on existing initiatives, an evaluation is being carried out with the potential of pursuing the BGF Seal of Quality and making this a core element of the management system.

An underground car park is available on site for employees to use free of charge. In 2025, 39 employees made use of the company-paid Jobticket travel pass for free use of public transport throughout Vorarlberg, on the condition that the company's underground car park is used on average only once a week.

By taking advantage of tax benefits and other incentives, since 2024 our employees have had the option to purchase an electric bicycle through a dealer and pay for it in monthly lease instalments, with the option to buy the bike at its residual value at the end of the lease term.

The scheme had already been taken up by 92 employees in 2025. Additional costs for wear-and-tear insurance and servicing packages are also covered by EHG.

EHG supports 'Vorarlberg radelt!', a cross-company cycling initiative aimed at motivating employees to commute by bike. In addition to the existing bike racks, a covered bike stand is being built near the entrance to building E in 2026.

An EHG running group is open to staff and promotes health through exercise. In a shared initiative with other companies in the region, social runs offer employees the chance to be supported by a professional trainer and improve their running technique and health in the process. A group that keeps fit by playing beach volleyball has also been set up together with other companies in the area.

Measures S1

Measure	Description	Timeframe
Jobticket travel pass	Free use of public transport throughout Vorarlberg, with restricted car use	Ongoing
Canteen	Freshly cooked lunch menus made with regional ingredients for all employees and retirees	Ongoing
EHG Campus	Development of a platform offering internal and external training opportunities on various topics	Since 2023
Work bicycle	Electric bike for work with insurance for employees, supported by tax incentives	From 2024
Sixth week of holiday	Employees can request a sixth week of holiday by sacrificing a certain share of their salary	From 2026
Workplace health promotion programme	Corporate health care coordinated by HR department through 'ehg'sund' project	From 2026
Bike stand outside building E	Covered bike stand near building E	Q2 / 2026

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Workers in the value chain (ESRS S2)

When selecting business partners, in addition to thinking about purely economic aspects, we also consider ecological and social criteria. We will not accept anyone who infringes environmental regulations, exploits employees, permits inhumane working conditions or child labour, or operates in legal grey areas as a business partner.

The supply chain often spans multiple distributors and countries and, due to the sources of raw materials and inputs frequently lacking in transparency, carries a correspondingly high risk of human rights violations. To address and minimise this risk as effectively as possible, the EHG Group has been relying on the support of IntegrityNext since 2023 as a portal for supplier information and the monitoring of negative reports on the internet.

Employees are not equally protected by law against child labour, exploitation or discrimination in all of our suppliers' countries of origin. In addition to the careful selection of our suppliers and our focus on European countries of origin, the country ranking in our supplier monitoring system is also intended to help identify and reduce risks in the supply chain. We require suppliers from third countries (non-EU) to sign a supplier code of conduct to ensure fundamental human rights and fair working conditions.

Since 2022, supply chain monitoring has placed a greater focus on the issue of conflict minerals to ensure that these originate exclusively from responsible and conflict-free sources. Of the conflict minerals defined by law, within the products we trade only tungsten is currently used as an alloying element in a few high-quality steels, and tin as an alloying element in bronzes. Contamination with the minerals mentioned cannot be ruled out and – particularly due to the recycling of scrap metal – their origin cannot be traced.

No metals traded by the EHG Group are listed in Annex I, Part B of EU Regulation 2017/821; as such, we do not fall within the scope of Article 1 of this regulation governing conflict minerals. Nevertheless, we continue to focus our efforts on achieving the best possible transparency in the supply chain for the products concerned, extending right back to the smelter of the conflict minerals. Feedback from the relevant suppliers in response to our enquiries in this regard is also incorporated directly into the supplier risk assessment.

The systematic logging of the management systems used by our suppliers enables a better assessment of our suppliers' business practices and certifications, based on which the risk profile of suppliers can be refined, thereby enabling more targeted measures and enquiries to be initiated.

Measures S2

Measure	Description	Timeframe
Long-standing partnerships	Freight forwarders, suppliers	Ongoing
IntegrityNext	Supplier monitoring and abstract risk assessment (country and sector risk)	Since 2023
Supplier code of conduct	Apply the EHG code of conduct to suppliers in third countries	From 2025

Affected communities (ESRS S3)

In 2022 and 2023, a comprehensive internal audit was performed for all operating facilities and official notifications in accordance with Section 82b GewO. All official notifications issued for the approved operation of the facilities were reviewed to ensure up-to-dateness and compliance, and the current status was documented. As these notifications often contain conditions regarding the reduction of hazards, disruptions and other negative impacts on the community, the audit addressed not only compliance but also a key aspect of public interest. The next internal audit pursuant to Section 82b GewO will take place in 2029.

EHG is located in a larger industrial area in Dornbirn, meaning that there are practically no private residents in the neighbourhood who are directly affected by the business. Nonetheless, EHG naturally endeavours to maintain the best-possible and conflict-free relationship with all surrounding private and commercial neighbours, efforts that are clearly successful with no complaints or proceedings pending in this regard. EHG supports selected associations – particularly those with a connection to employees – and the company therefore acts as a sponsor for the local football club SCR Altach. As part of its Christmas campaign, the company supports regional social projects and institutions.

Measures S3

Measure	Description	Timeframe
Update on Section 82b audits	Audit of the production facilities and official notifications, including associated conditions	Q1 / 2024
Club sponsorship	Support for local clubs and associations	Ongoing

Consumers and end users (ESRS S4)

As a rule, EHG does not supply products directly to end consumers, as we deal exclusively in raw materials and semi-finished products. The vast majority of products manufactured by our customers are reused or processed within industry and, with very few exceptions, will not end up as standalone products with consumers. The most common point of contact with end customers is likely to take the form of a machine component incorporated into consumer goods; however, this is never under the EHG brand and always under the technical responsibility of a direct or indirect EHG customer.

For several years now, orders and collections have no longer been possible for private customers, with the exception of employees of the EHG Group. Due to the lack of direct relevance, no further measures, risks or opportunities have been defined in this regard.

Measures S4

Measure	Description	Timeframe
None		


EHG

Our employees are the cornerstone of our success, which is why we intend to place greater emphasis on staff training.

EHG sustainability in figures

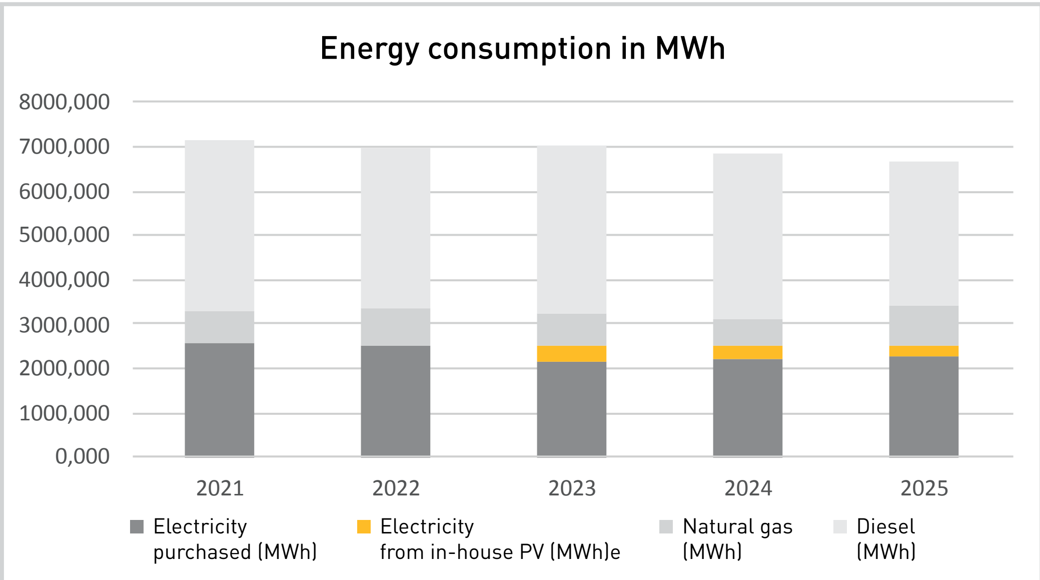
The key figures presented below have been selected to provide data to support the topics discussed previously. Each key figure includes a reference and a link (in brackets) to one or more relevant ESRS chapters.

Key figures that do not represent annual consumption were calculated as at 31 December 2025. For example, the personnel figures therefore reflect the situation at the end of the year and do not take into account fluctuations during the financial year.

Energy use and carbon footprint

Energy consumption (ESRS E1)

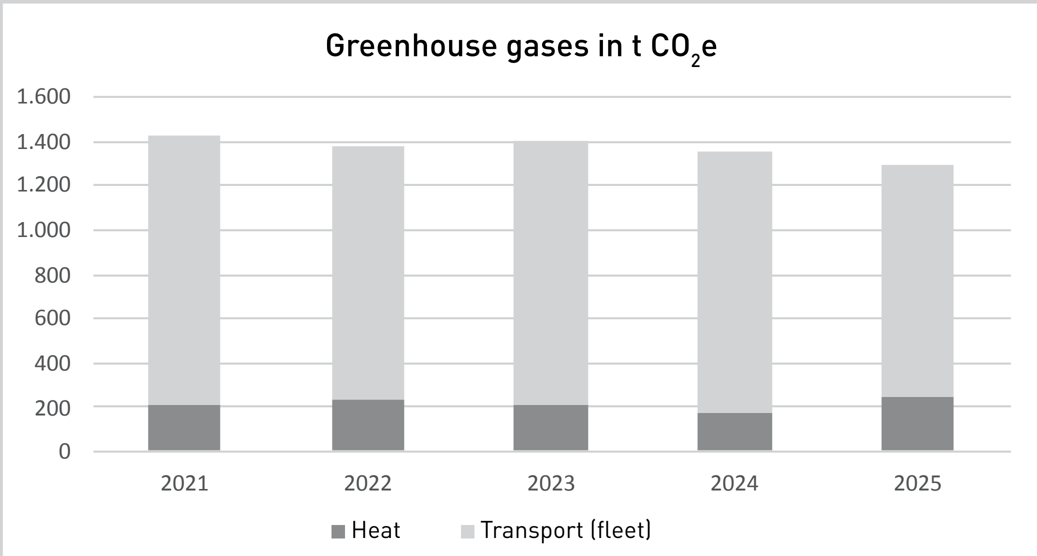
Energy consumption at the Dornbirn site comprises natural gas, electricity and diesel fuel as follows:



The surplus electricity from our own photovoltaic system, which was fed into the grid, amounted to 11.038 MWh last year and was not counted as a reduction in our own emissions.

CO_2 emissions – Scope 1 (ESRS E1)

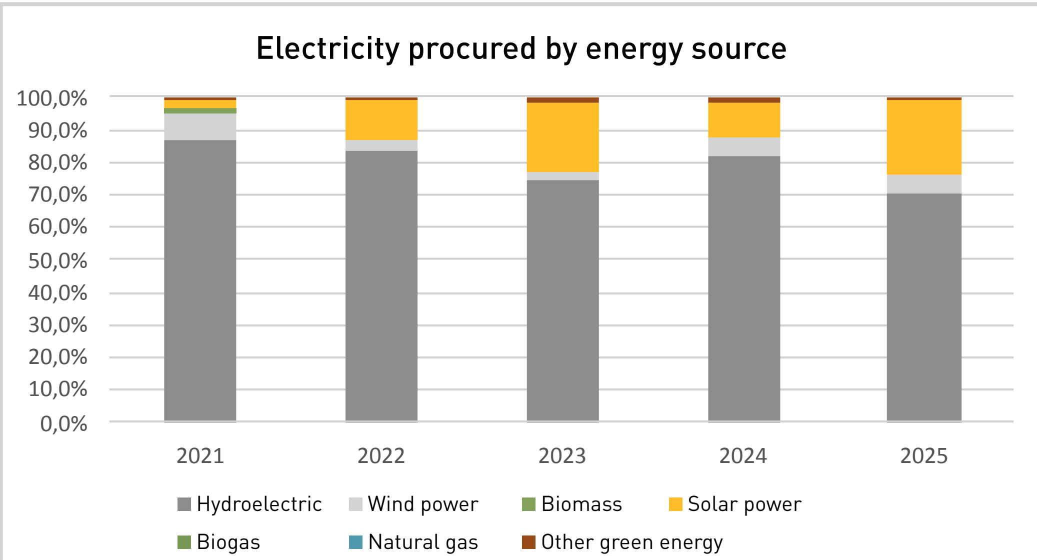
The direct emissions shown below for the 2025 financial year resulted from the use of natural gas for heat generation and diesel for the company's own transport of deliveries to customers, as well as the use of diesel forklift trucks.



CO_2 emissions – Scope 2 (ESRS E1)

There is no need to present indirect emissions from energy procurement, because – according to VKW's electricity labelling – all electricity consumption at the site has come from emission-free, renewable energy sources since 2021.

The electricity mix in 2025 consists of the following energy sources:



CO_2 emissions – Scope 3 (ESRS E1)

There is currently no reliable data available to present Scope 3 emissions based on supplier information, as the reporting of emissions figures from the upstream value chain remains very limited.

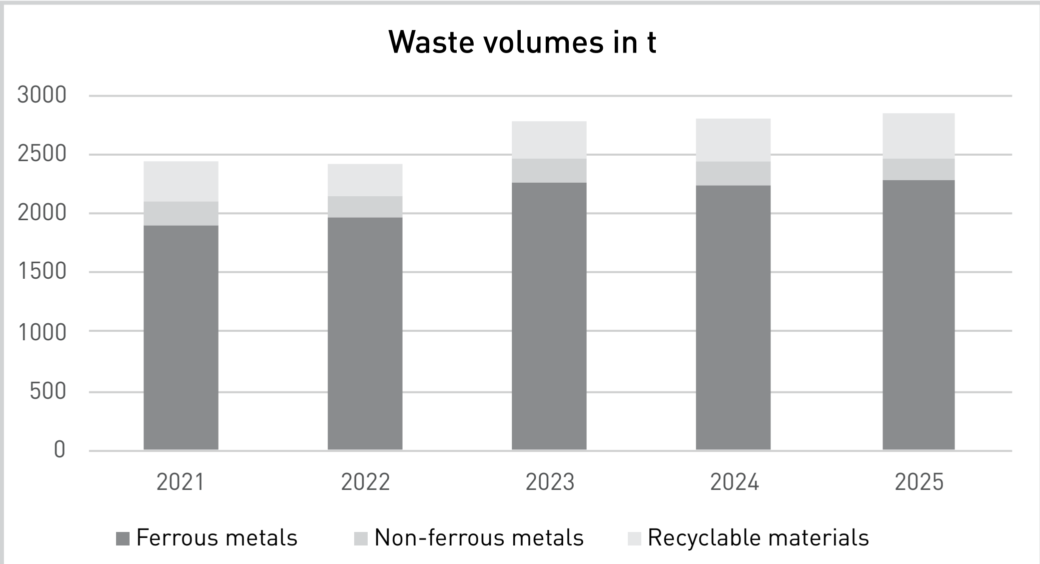
The product carbon footprint is calculated on the basis of typical CO_2 values as set out in the EU's CBAM publication, unless the supplier has provided their own emissions data. On request our customers receive confirmation based on this calculation method detailing the emissions associated with the products we have supplied to them over a defined period, for example the previous year.

Circular economy and the environment

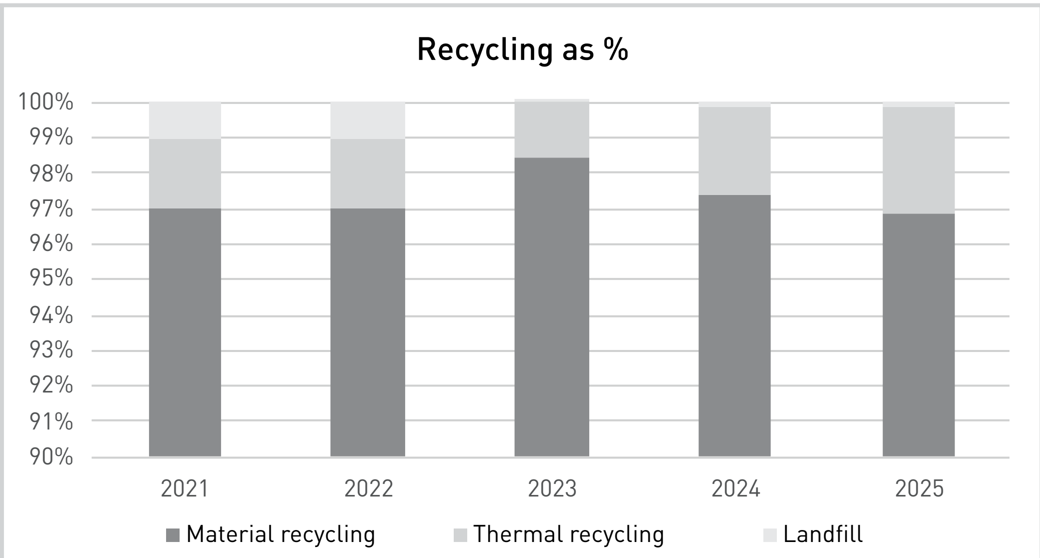
Waste from EHG is an important source of raw materials and reduces environmental impact through huge savings in carbon emissions compared to primary production based on raw material extraction without the use of scrap.

Recycling rate (ESRS E2, ESRS E5)

The volume of waste in 2025 remained almost unchanged from the previous year at 2,880 tonnes.
Recyclable materials collected, excluding iron and metal scrap, accounted for 13.7%.

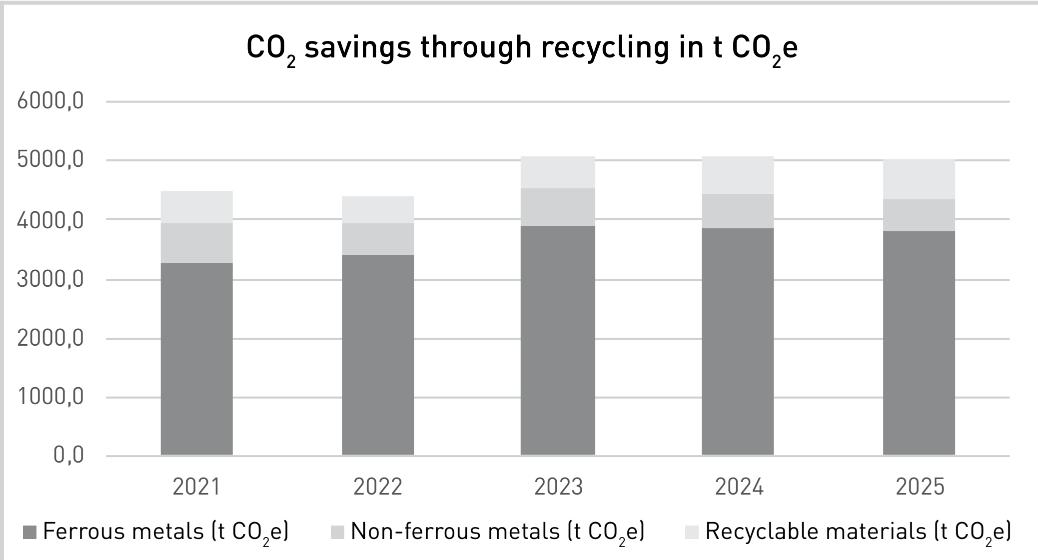


97% of the waste collected and disposed of by EHG was sent for material recycling and approx. 3% for thermal recycling. Only 0.1%, or 1.8 tonnes, became landfill.



CO_2 savings through recycling (ESRS E1, ESRS E5)

The material recycling of steel and metal waste can result in significant CO_2 savings compared to primary production from raw materials. The following estimated savings from recycling relate to the waste volumes recycled by EHG Dornbirn.

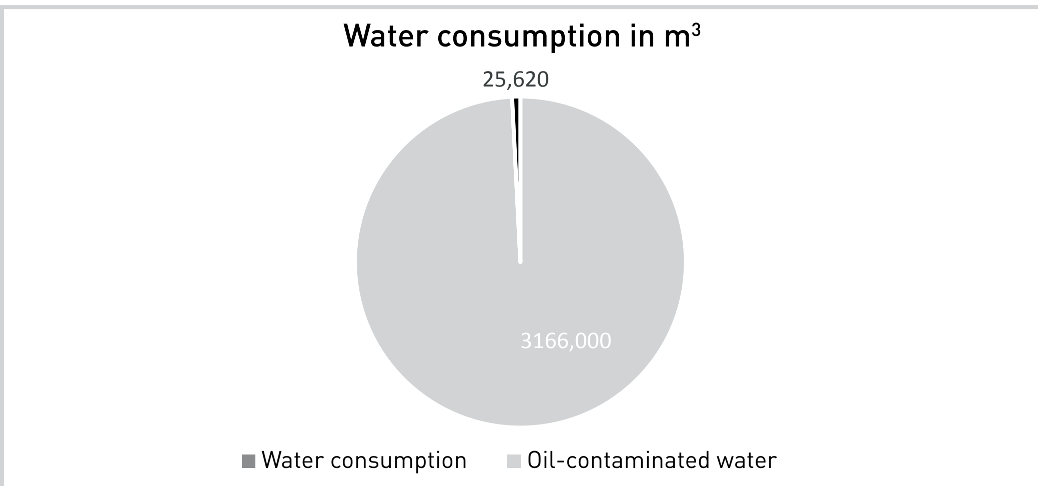


Hazardous waste (ESRS E2)

EHG generates very little hazardous waste from its regular business operations. This waste primarily arises directly from oil-contaminated waste and indirectly from the disposal of batteries, light bulbs and electrical appliances. Of the total volume of hazardous waste, amounting to 30.6 tonnes, oil-contaminated water from the sawing facilities accounts for the largest share at 25.6 tonnes. EHG does not carry out any hazardous goods transport itself; this is handled solely by the contracted waste disposal company, which collects the hazardous waste from the EHG site.

Water consumption (ESRS E3, ESRS E5)

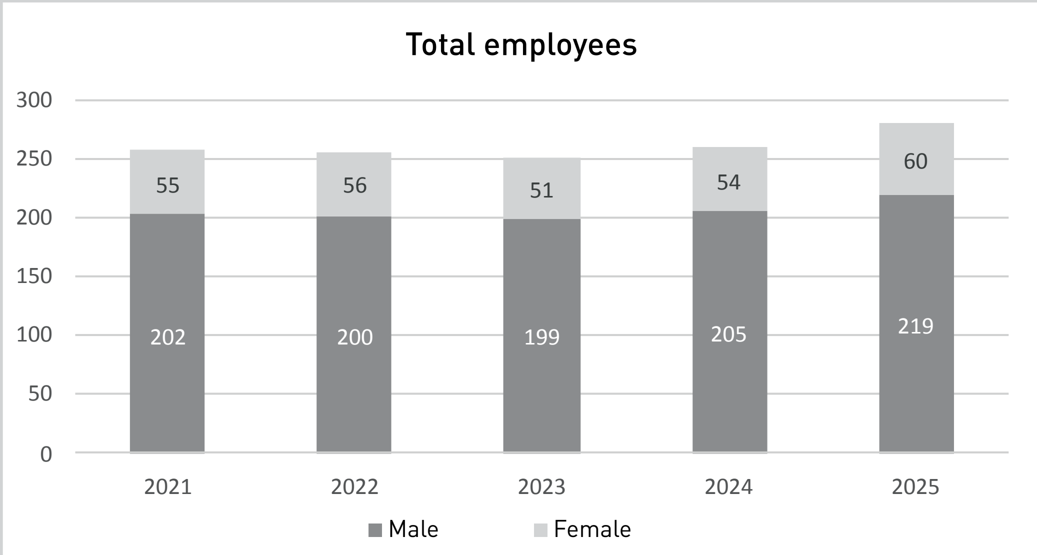
Almost all of the water used by EHG can be returned to the water cycle without further treatment. Only contaminated and oily water is separated, collected by the waste management company and treated before it is also returned to the water cycle via a sewage treatment plant. At less than 1% of total water consumption, this represents a very low level of contamination, most of which can be removed through subsequent treatment.



Employees

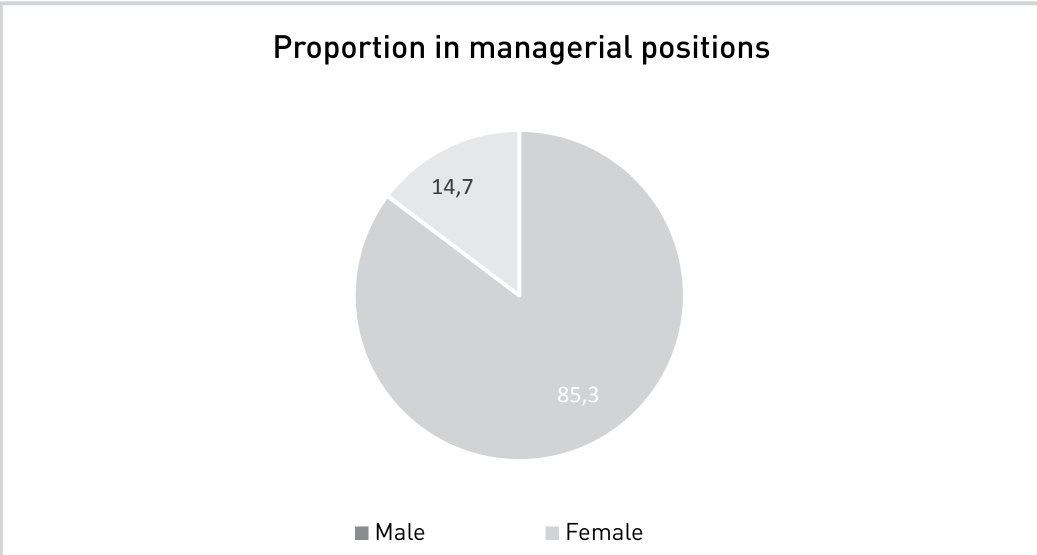
Employee structure (ESRS S1)

Of the 280 employees on our books at the end of the year, 60 are women, representing 21.5% of the workforce. We currently have very few women working in warehouse logistics in particular due to the sometimes physically demanding nature of the work, which is a major factor in this low proportion of female staff.



Management (ESRS S1)

The proportion of women in managerial positions was 14.7% as at the reporting date.

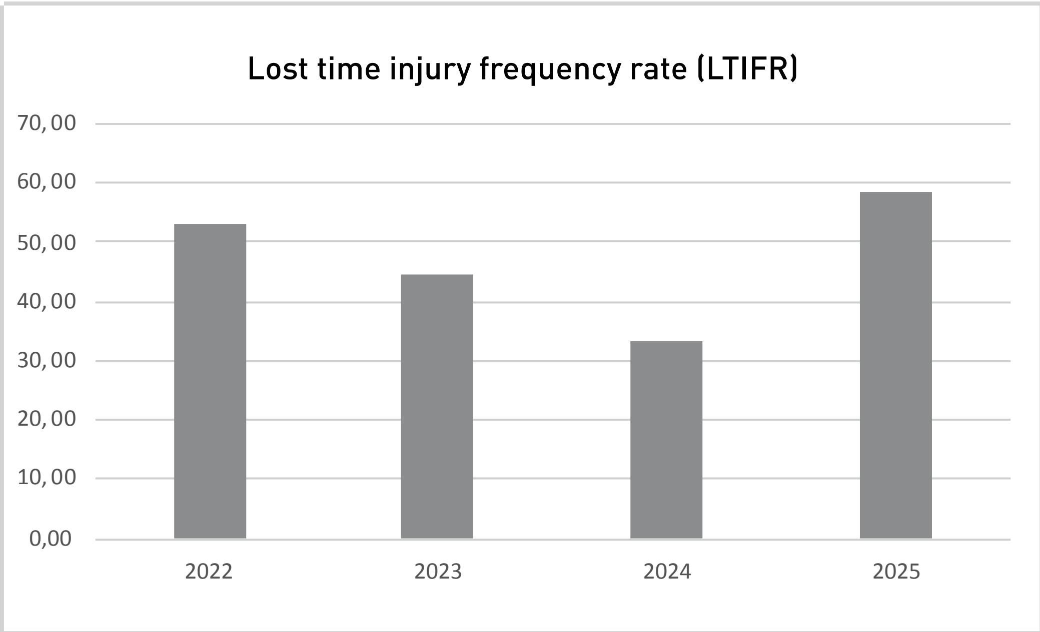


Staff turnover rate excluding retirements (ESRS S1)

The staff turnover rate in 2025 stood at 19.5%, excluding retirements, trial days and fixed-term contracts.

Absenteeism due to accidents (ESRS S1)

In 2025, a total of 23 workplace accidents with more than three days' sick leave resulted in staff absences amounting to 334 working days or 2,703 working hours in all. As such, the standard metric of lost time injury frequency rate (LTIFR) was significantly poorer at 58.6 than in previous years.



Paid overtime for workers (ESRS S1)

Overtime paid to workers in 2025 accounted for an average of 23% of fixed salary over and above the collective agreement.

Voluntary social benefits (ESRS S1)

In addition to monthly salaries and wages, EHG funds further voluntary social benefits, such as a meal allowance for lunch in the canteen, Jobticket travel passes, support for clubs, anniversary celebrations, staff outings, events and workwear. These voluntary social expenditure items accounted for 1.78% of total wage costs paid out in the reporting year.

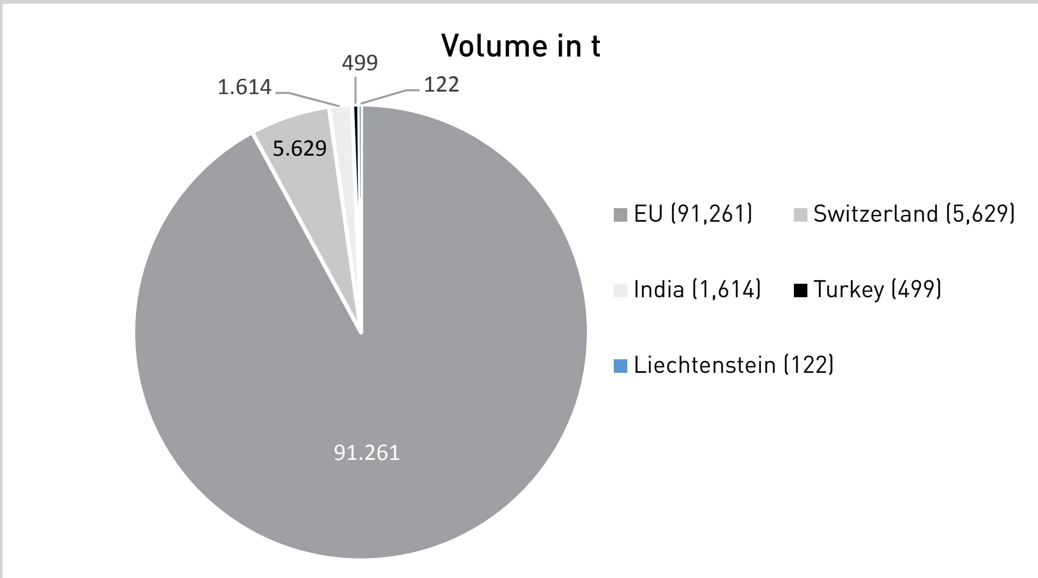
Supply chains

Reliable key figures and data for the supply chain, from raw material suppliers to EHG, are still very scarce and difficult to obtain. The following key figures are intended to provide at least a rough overview and can hopefully be supplemented with more meaningful detailed data in the coming years.

Countries of EHG suppliers (ESRS E5, ESRS S2)

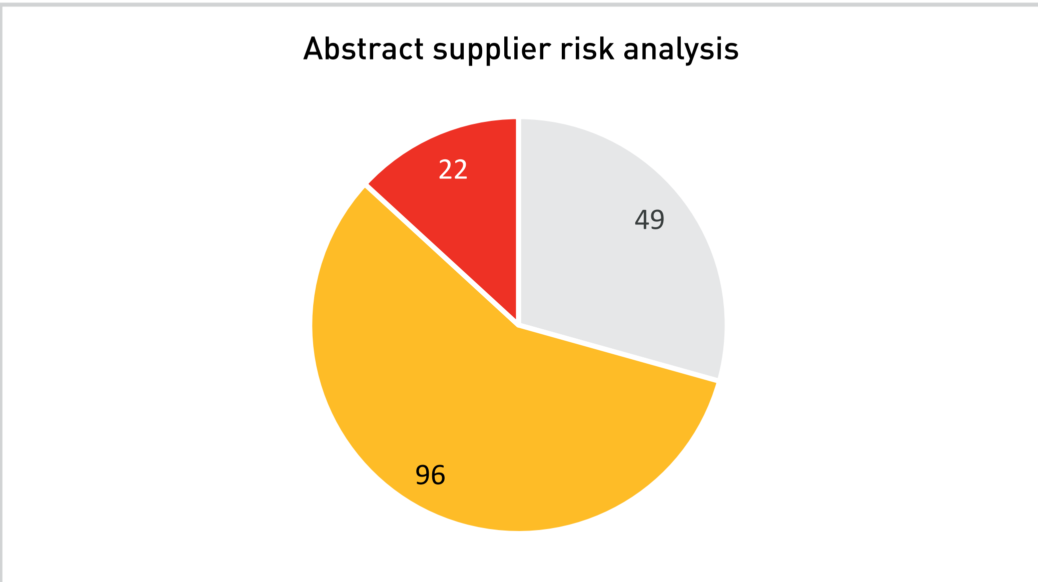
Of the purchased volumes (in kg), 92% were sourced by EHG from suppliers within the EU. However, the country of origin of the goods is not necessarily the same as the supplier's country, because traders do not always source and deliver goods from their own country.

In terms of volume, the goods purchased by EHG in 2025 were sourced from suppliers in the following countries:



Supplier risk profile (ESRS E2, ESRS S2)

Based on the abstract risk analysis in IntegrityNext – i.e. country and sector risk – the following risk assessment applies to the 167 main EHG suppliers with an annual turnover of more than €250,000.



Of the 22 suppliers with high country and sector risk, four have improved their status from very high risk (red) to medium risk (yellow) following a detailed assessment.

Flustron reports (ESRS S1, ESRS S2, ESRS S3)

Since the group-wide implementation of the whistleblowing platform in July 2023, no reports have been received from either internal or external individuals. A link to the anonymous whistleblower platform Flustron used by EHG is provided on our website. A corresponding graph is therefore unnecessary.

Summary

With this fourth sustainability report, EHG aims to recognise the importance of environmental, sustainability and socially responsible corporate governance issues. Once again, we have attempted to summarise our guiding principles and specific measures in this area in a concise format, thereby enabling our customers and stakeholders to better assess the EHG Group in relation to the ESG risks and opportunities addressed.

In the spirit of a comprehensive materiality analysis, we welcome your suggestions and feedback for future reports. If we have not been able to answer all of your questions regarding EHG's sustainability or if, in your view, relevant aspects are still to be addressed then do not hesitate to get in touch with us.

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