



# SUSTAINABILITY STATEMENT

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2024

**ESIM**  
ESIM CHEMICALS

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# 1 General Information

*Sustainability Statement 2024*

## 1.1 General Disclosures

ESRS 2

### **BP-1 General basis for preparation of sustainability statements**

This sustainability statement is prepared based on the European Sustainability Reporting Standards (ESRS) issued by the European Financial Reporting Advisory Group (EFRAG). The consolidation is aligned with our financial statements and includes ESIM Holdings und Management Services GmbH and ESIM Chemicals GmbH. Together referred to as “ESIM” or “the company” in the report. Quantitative data follows the same consolidation principle unless specified otherwise along with the reported information. The inclusion of the up- and downstream value chain is outlined along the respective disclosures.

### **BP-2 Disclosures in relation to specific circumstances**

The accounting methods used will be described alongside the disclosure to which they refer including a description of specific circumstances if applicable. Anticipated financial effects will be included in future reports in alignment with the ESRS.

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

In 2024, ESIM's executive team (identified as the highest managing body) consists of six members: Dr. Frank Wegener (CEO), Alexander Karnovsky (CFO), Dr. Agnieszka Kaleta, DI Dr. Hannes Unterleutner, Tobias Pöcheim and Rudy Dijkhuizen.

The executive team is supported by the leadership team, consisting of 13 members. Additionally, the advisory board consists of the CEO, two works council representatives and a representative of the company owner SUN Capitals Inc. The percentage of members of the executive team, leadership team and advisory board by gender is 88 % male and 12 % female. The percentage of independent members of the executive team is 0 %.

The executive team is accountable for the integrated management system that covers our current sustainability policy, which needs adaptation to the reporting requirements. The roles and responsibilities of the executive team in exercising oversight of the process to manage material impacts, risks and opportunities will be determined when implementing the sustainability matters in the integrated management system.

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

In 2023, a project was set up to prepare the company for the upcoming sustainability reporting requirements according to CSRD. At this time no specific communication regarding the reporting was installed, besides the tracking of the project progress. The result of the double materiality assessment conducted in 2023 was discussed and approved by the executive team.

Our integrated management system includes our approach to sustainability, which is to be adapted to current requirements and supplemented by sustainability reporting. In the frame of this task also the responsibilities and processes concerning the supervision of all related matters will be set.

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

The disclosure of information regarding the incentive schemes will be addressed in compliance with the ESRS in future reports.

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**GOV-4 Statement on due diligence**

Table 1 provides an overview, where to find information on our due diligence approach.

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

As mentioned before, no sustainability reporting process was established in 2023. The responsibilities and processes concerning the supervision of all sustainability related matters will be set during the adaptation of our integrated management system.

Our risk management process consolidates all relevant risks in a matrix that depicts magnitude and likelihood for each risk respectively. The risks are managed in nine areas: Overall strategy, finance, customer relations, operations, quality/environment/safety, legal, information technology, supply chain and human resources. A project to improve the process was completed in 2024.

*Table 1: Due Diligence*

| Core elements of due diligence  | Section of the statement            |                                     |
|---|-------------------------------------|-------------------------------------|
| Embedding due diligence in governance, strategy and business model        | General                             | Section 1                           |
| Engaging with affected stakeholders in all key steps of the due diligence | General<br>Social<br>Governance     | Section 1<br>Section 3<br>Section 4 |
| Identifying and assessing adverse impacts                                 | General                             | Section 1                           |
| Taking actions to address those adverse impacts                           | Environment<br>Social<br>Governance | Section 2<br>Section 3<br>Section 4 |
| Tracking the effectiveness of these efforts and communicating             | Environment<br>Social<br>Governance | Section 2<br>Section 3<br>Section 4 |

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### **SBM-1 Strategy, business model and value chain**

ESIM offers custom manufacturing services with a focus on exclusive production of agrochemicals, high-quality intermediates and other organic compounds. We operate business to business with customers situated in Europe, America and Asia and our supply chain is equally international. We get the major share of our raw materials from Europe and the second largest part of raw materials are imported from Asia. Our total revenue in 2024 is 114.866.715 €.

Our operations are located in Linz, Austria, complemented by a sales office in Frankfurt, Germany. 341 people are employed in the year 2024. More detailed information on our own workforce is provided in section 3.

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### **SBM-2 Interests and views of stakeholders**

ESIM engages continuously with its stakeholders to improve our business and learn from our stakeholders' perspectives. This engagement is practiced throughout the company, crossing different business functions and fields of expertise. Our key stakeholders are those who are impacted by our operations and business conduct.

The engagement with stakeholders follows different approaches depending on the context and objective of the engagement. We share information internally via town-hall meetings, Intranet news and newsletters, externally via our homepage, sustainability ratings or individual communications. Surveys have proven useful for a broad audience or the inclusion of many participants (e.g. employee wellbeing survey). Moreover, we engage in regular meetings with internal and external stakeholders.

Our interaction with stakeholders serves multiple purposes. We gain insight into expectations and views, learn from stakeholders' experience, promote our Code of Conduct and ensure regulatory compliance. The knowledge gained leads to continuous improvement of our business and enables us to better navigate upcoming challenges.

During our double materiality assessment representatives from all key stakeholder groups were included. In general, the assessment shows a focus on substances of concern, the safety of our own employees and corporate culture. Additionally, our customers are highly interested in matters of energy and GHG emissions due to their own obligations and the high uncertainty regarding energy prices at the time of the survey. Biodiversity received the least attention during the assessment.

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

During our materiality assessment (see also IRO-1) we collected impacts, risks and opportunities related to the sustainability topics from the ESRS. A climate risk analysis will be conducted in 2025 and the results will be incorporated into our risk management and integrated management system. Our current material matters are already addressed by our policies and ISO-certification. However, no comprehensive analysis of the resilience of our strategy and business model was carried out.



## **IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities**

One key element of our sustainability management is the double materiality assessment that we conducted in 2023 with reference to the Draft ESRS. We followed the approach to first create a long list of sustainability matters by complementing the list of matters included in the appendix A of ESRS 1 (draft) in brainstorm sessions with various experts throughout the company. During these sessions also impacts, risks and opportunities related to the discussed matters were collected. The identified matters were sorted, redundancies removed, and all relevant matters were subjected to the following evaluation with regard to scale, scope and irremediable character of the related impacts. For potential impacts also the “likelihood” was scored.

For the assessment impacts concerning the impact of the company on the matter (Impact Materiality; inside out perspective) as well as impacts resulting from the matter concerning the company (Financial materiality, outside in perspective) were considered.

Additionally, we reached out to our stakeholders to learn about the influence a matter has on their decision-making process and concerning which matter ESIM's commitment is particularly important to them.

### ***Scoring – Impact Materiality***

To achieve a common understanding of the terms scale and scope and enable consistent results, the following definitions were introduced – see Table 2.

No additional definition of the terms “irremediable character” or “likelihood” seemed necessary.

The impact materiality was determined to be the highest individual score for scale, scope or irremediable character. A team of experts from various fields of expertise within the company participated in the impact materiality assessment.

### ***Scoring – Financial Materiality***

The financial materiality assessment was conducted in close alignment with the current ESIM risk management process. For each matter the probability of occurrence and magnitude of financial impact was scored. The financial materiality was determined to be the level of probability multiplied by the level of magnitude. A small group of experts participated in the financial materiality assessment.

### ***Stakeholder Inclusion***

A representative selection of stakeholders participates in the external assessment. We reached out to authorities & certification bodies, customers, suppliers & service providers, own employees & management, banks & insurance, as well as locals near the production site via a questionnaire to gain a broad perspective on their priorities.

### ***Results***

Based on the materiality assessment we will disclose information from ESRS E1 Climate Change, ESRS E2 Pollution, ESRS E5 Resource Use and Circular Economy, ESRS S1 Own Workforce, ESRS S2 Workers in the Value Chain and ESRS G1 Business Conduct. The ESRS E2 water and marine resources was rated not

*Table 2: Definition of scale and scope*

| <b>matter</b> | <b>Scale</b>                           | <b>scope</b>              |
|---------------|--|---------------------------|
| environment   | impact on environment                  | affected area of impact   |
| social        | impact on life quality                 | number of people affected |
| governance    | impact on the business success of ESIM | number of people affected |

material for our business, as were ESRS E4 biodiversity and ecosystems ESRS S3 affected communities and ESRS S4 consumer and end-users. Details concerning the materiality will be described in context of the respective chapter.

The materiality assessment will be included in our integrated management approach.

### 1.1.1 Specific topical DR from topical ESRS

#### **IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement**

*Table 3: Disclosure requirements – General*

| DR    | General   | page |
|-------|---|------|
| BP-1  | General basis for preparation of sustainability statements  | 2    |
| BP-2  | Disclosures in relation to specific circumstances   | 2    |
| GOV-1 | The role of the administrative, management and supervisory bodies   | 2    |
| GOV-2 | Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies | 3    |
| GOV-3 | Integration of sustainability-related performance in incentive schemes  | 3    |
| GOV-4 | Statement on due diligence  | 3    |
| GOV-5 | Risk management and internal controls over sustainability reporting   | 3    |
| SBM-1 | Strategy, business model and value chain  | 4    |
| SBM-2 | Interests and views of stakeholders   | 4    |
| SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model                                    | 4    |
| IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities                                       | 5    |
| IRO-2 | Disclosure requirements in ESRS covered by the undertaking's sustainability statement   | 6    |

*Table 4: Disclosure requirements - Environment*

| DR       | Environment   | page |
|----------|---|------|
| E1-1     | Transition plan for climate change mitigation   | 11   |
| E1.GOV-3 | Integration of sustainability related performance in incentive schemes  | 11   |
| E1.SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model              | 11   |
| E1.IRO-1 | Description of the processes to identify and assess material climate related impacts, risks and opportunities | 11   |
| E1-2     | Policies related to climate change mitigation and adaptation  | 11   |
| E1-3     | Actions and resources in relation to climate change policies  | 12   |
| E1-4     | Targets related to climate change mitigation and adaptation   | 12   |
| E1-5     | Energy consumption and mix  | 12   |
| E1-6     | Gross Scopes 1, 2, 3 and Total GHG emissions  | 13   |

| DR       | Environment   | page         |
|----------|---|--------------|
| E1-7     | GHG removals and GHG mitigation projects financed through carbon credits  | not material |
| E1-8     | Internal carbon pricing   | 13           |
| E1-9     | Anticipated financial effects from material physical and transition risks and potential climate related opportunities                   | 14           |
| E2.IRO-1 | Description of the processes to identify and assess material pollution related impacts, risks and opportunities                         | 14           |
| E2-1     | Policies related to pollution   | 14           |
| E2-2     | Actions and resources related to pollution  | 14           |
| E2-3     | Targets related to pollution  | 14           |
| E2-4     | Pollution of air, water and soil  | 15           |
| E2-5     | Substances of concern and substances of very high concern   | 16           |
| E2-6     | Anticipated financial effects from pollution related impacts, risks and opportunities   | 16           |
| E5.IRO-1 | Description of the processes to identify and assess material resource use and circular economy related impacts, risks and opportunities | 16           |
| E5-1     | Policies related to resource use and circular economy   | 16           |
| E5-2     | Actions and resources related to resource use and circular economy  | 17           |
| E5-3     | Targets related to resource use and circular economy  | 17           |
| E5-4     | Resource inflows  | 17           |
| E5-5     | Resource outflows   | 17           |
| E5-6     | Anticipated financial effects from resource use and circular economy related impacts, risks and opportunities                           | 18           |

Table 5: Disclosure requirements - Social

| DR       | Social   | Page |
|----------|--|------|
| S1.SBM-2 | Interests and views of stakeholders  | 19   |
| S1.SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model   | 19   |
| S1-1     | Policies related to own workforce  | 19   |
| S1-2     | Processes for engaging with own workers and workers' representatives about impacts   | 20   |
| S1-3     | Processes to remediate negative impacts and channels for own workers to raise concerns   | 20   |
| S1-4     | Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions | 20   |
| S1-5     | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities   | 20   |
| S1-6     | Characteristics of the undertaking's employees   | 21   |
| S1-7     | Characteristics of non-employee workers in the undertaking's own workforce   | 22   |
| S1-8     | Collective bargaining coverage and social dialogue   | 22   |
| S1-9     | Diversity metrics  | 22   |
| S1-10    | Adequate wages   | 22   |



| DR       | Social  | Page         |
|----------|---|--------------|
| S1-11    | Social protection   | 23           |
| S1-12    | Persons with disabilities   | 23           |
| S1-13    | Training and skills development metrics   | 23           |
| S1-14    | Health and safety metrics   | 23           |
| S1-15    | Work-life balance metrics   | 23           |
| S1-16    | Compensation metrics (pay gap and total compensation)   | 23           |
| S1-17    | Incidents, complaints and severe human rights impacts   | not material |
| S2.SBM-2 | Interests and views of stakeholder  | 24           |
| S2.SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model  | 24           |
| S2-1     | Policies related to value chain workers   | 24           |
| S2-2     | Processes for engaging with value chain workers about impacts   | 24           |
| S2-3     | Processes to remediate negative impacts and channels for value chain workers to raise concerns  | 24           |
| S2-4     | Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action | 24           |
| S2-5     | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities  | 24           |

Table 6: Disclosure requirement - Governance

| DR       | Governance  | Page         |
|----------|---|--------------|
| G1.GOV-1 | The role of the administrative, supervisory and management bodies                             | 25           |
| G1.IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities | 25           |
| G1-1     | Corporate culture and Business conduct policies and corporate culture                         | 25           |
| G1-2     | Management of relationships with suppliers  | 26           |
| G1-3     | Prevention and detection of corruption and bribery  | not material |
| G1-4     | Confirmed incidents of corruption or bribery  | not material |
| G1-5     | Political influence and lobbying activities   | not material |
| G1-6     | Payment practices   | not material |

### 1.1.2 Additional DR from sector specific ESRS

The sector specific ESRS are not published yet.

### 1.1.3 Table of all Datapoints deriving from other EU legislation

Table 7: Datapoints deriving from other EU legislation

| Disclosure Requirement and related datapoint   | Page | Comment   |
|--|------|---|
| ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)   | 2    |   |
| ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)  | 2    |   |
| ESRS 2 GOV-4 Statement on due diligence paragraph 30   | 3    |   |
| ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i  | 4    | not involved                                      |
| ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii  | 4    |   |
| ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii   | 4    | not involved                                      |
| ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14   | 11   | no transition plan has been established up to now |
| ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)   | 11   | not applicable                                    |
| ESRS E1-4 GHG emission reduction targets paragraph 34  | 12   | no targets have been defined yet                  |
| ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38  | 12   |   |
| ESRS E1-5 Energy consumption and mix paragraph 37  | 12   |   |
| ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43   | 12   |   |
| ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44   | 13   |   |
| ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55  | 13   |   |
| ESRS E1-7 GHG removals and carbon credits paragraph 56   | -    | DR not material                                   |
| ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66   | 14   | no climate risk analysis available                |
| ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)   | 14   | no climate risk analysis available                |
| ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).   | 14   | no climate risk analysis available                |
| ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).   | 14   | no climate risk analysis available                |
| ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69  | 14   | no climate risk analysis available                |
| ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28 | 15   |   |
| ESRS E5-5 Non-recycled waste paragraph 37 (d)  | 17   |   |

| Disclosure Requirement and related datapoint  | Page | Comment                         |
|---|------|---------------------------------|
| ESRS E5-5 Hazardous waste and radioactive waste paragraph 39  | 17   |                                 |
| ESRS 2- SBM3 - S1 Risk of incidents of forced labor paragraph 14 (f)  | 19   |                                 |
| ESRS 2- SBM3 - S1 Risk of incidents of child labor paragraph 14 (g)   | 19   |                                 |
| ESRS S1-1 Human rights policy commitments paragraph 20  | 19   |                                 |
| ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 21 | 19   |                                 |
| ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22  | 19   |                                 |
| ESRS S1-1 Workplace accident prevention policy or management system paragraph 23  | 19   |                                 |
| ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)   | 20   |                                 |
| ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)                                    | 23   |                                 |
| ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)   | 23   |                                 |
| ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)   | 23   | Will be included in the future. |
| ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)   | 23   | Will be included in the future. |
| ESRS S1-17 Incidents of discrimination paragraph 103 (a)  | -    | DR not material                 |
| ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)  | -    | DR not material                 |
| ESRS 2- SBM3 – S2 Significant risk of child labor or forced labor in the value chain paragraph 11 (b)                                     | 24   |                                 |
| ESRS S2-1 Human rights policy commitments paragraph 17  | 24   |                                 |
| ESRS S2-1 Policies related to value chain workers paragraph 18  | 24   |                                 |
| ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19                                   | 24   |                                 |
| ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 19 | 24   |                                 |
| ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36                             | 24   |                                 |
| ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)   | 25   |                                 |
| ESRS G1-1 Protection of whistleblowers paragraph 10 (d)   | 25   |                                 |
| ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)   | -    | DR not material                 |
| ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)  | -    | DR not material                 |

The materiality of information was determined based on the materiality assessment following the Flowchart of Appendix E of the ESRS.

## 2 Environmental Information

*Sustainability Statement 2024*

### 2.1 Disclosure pursuant to Article 8 of Regulation 2020/852

Taxonomy

The disclosures pursuant to Article 8 of Regulation 2020/852 (Taxonomy Regulation) are being developed and will be included in future reports according to the applicable timelines.

### 2.2 Climate Change

ESRS E1

#### **E1-1 Transition plan for climate change mitigation**

A transition plan for climate change mitigation is currently being developed for ESIM.

#### **E1.GOV-3 Integration of sustainability related performance in incentive schemes**

The disclosure of information regarding the incentive schemes will be addressed in compliance with the respective reporting standards in future reports.

#### **E1.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model**

ESIM operates in a high impact climate sector according to regulation (EU)

2022/1288. Plans for conducting a climate risk assessment are currently in progress.

#### **E1.IRO-1 Description of the processes to identify and assess material climate related impacts, risks and opportunities**

The process outlined in section 1.1. was applied for the materiality assessment. Information on climate-related physical impacts will be integrated in our materiality assessment as soon as the underlying analysis is available.

#### **E1-2 Policies related to climate change mitigation and adaptation**

ESIM's integrated management system comprises of our policies on different matters, such as ESIM's sustainability policy that includes our ambitions for reduction of our corporate carbon intensity

and our energy policy that covers ambitions to use energy sources as efficiently as possible, reduce pollution and greenhouse gas emissions caused by our energy consumption and reduce our dependence on fossil fuels through the use of renewable energy sources. The policy covers our own operations and is signed off by the CEO.

### **E1-3 Actions and resources in relation to climate change**

ESIM is committed to reduce its carbon intensity and approach carbon neutral operations. Our ambitions are reflected in improvement projects targeting specific manufacturing processes as well as general operational conditions. One major achievement is the optimization of one manufacturing process leading to a 46 % reduction of operational CO<sub>2</sub> emissions compared to 2019 (completed in 2024). Other improvement projects are the optimization of the incineration process of our on-site incineration plant (completed in 2023), resulting in a reduction of 2.641,16 MWh in natural gas consumption.

In addition, the optimization of one of our cooling systems (completed in 2024) contributed to a reduction in resource consumption, resulting in savings of 85.835 m<sup>3</sup> of cooling water.

The disclosures related to regulation (EU) 2021/2178 are not available at the time. A project is set up in 2024 to establish the taxonomy-related indicators and ESIM will be ready to disclose this information for the reporting year 2025.

### **E1-4 Targets related to climate change mitigation and adaptation**

Since there is no transition plan for climate change mitigation available, there are no related targets. However, we set an internal ambition to reduce the carbon intensity of our operations by 30 % by 2030 Scope 1 & 2 (Baseline 2022) and achieve CO<sub>2</sub> neutrality by 2040.

### **E1-5 Energy consumption and mix**

ESIM operates in a high impact climate sector according to regulation (EU) 2022/1288, namely the manufacture of other organic basic chemicals. The energy intensity in 2024 is 0,00052 MWh/€.

In 2024, ESIM produced 16.180 MWh of steam. Table 8 shows our energy consumption and mix.

*Table 8: Energy consumption*

| <b>Energy consumption and mix</b>  | <b>2024</b> |
|--|-------------|
| Fuel consumption from coal and coal products (MWh)   | 0,00        |
| Fuel consumption from crude oil and petroleum products (MWh)   | 0,00        |
| Fuel consumption from natural gas (MWh)  | 5.164,56    |
| Fuel consumption from other fossil sources (MWh)   | 0,00        |
| Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh) | 54.709,68   |
| Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)                        | 59.874,24   |
| Share of fossil sources in total energy consumption (%)  | 100,00      |
| Consumption from nuclear sources (MWh)   | 0,00        |
| Share of consumption from nuclear sources in total energy consumption (%)                            | 0,00        |

| Energy consumption and mix  | 2024      |
|---|-----------|
| Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh) | 0,00      |
| Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)   | 0,00      |
| The consumption of self-generated non-fuel renewable energy (MWh)   | 0,00      |
| Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)   | 0,00      |
| Share of renewable sources in total energy consumption (%)  | 0,00      |
| Total energy consumption (MWh) (calculated as the sum of lines 6, and 11)   | 59.874,24 |

### E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions

GHG Emissions are calculated based on the GHG protocol using a cradle to gate approach. Only the market-based scope 2 GHG emissions are available, based on the emission factor outlined by our supplier. No additional calculation of the location-based GHG emissions is available.

Table 9: GHG Emissions

| GHG Emissions   | 2024          |
|---|---------------|
| Scope 1 GHG emissions   | 4.193,00      |
| Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)                                     | 4.193,00      |
| Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)       | 0,00          |
| Scope 2 GHG emissions   | 18.678,40     |
| Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)                      | Not available |
| Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)                        | 18.678,40     |
| Significant scope 3 GHG emissions   | 49.863,66     |
| Total Gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> eq)                    | -             |
| Purchased goods and services  | 32.998,79     |
| Fuel and energy-related Activities (not included in Scope 1 or Scope 2)               | 4.856,00      |
| Upstream transportation and distribution (included in "Purchased goods and services") | -             |
| Waste generated in operations   | 11.161,00     |
| Business traveling  | 53,33         |
| Employee commuting  | 618,94        |
| Upstream leased assets  | 175,60        |
| Total GHG emissions (tCO <sub>2</sub> eq)   | 72.735,06     |
| Total GHG emissions intensity (tCO <sub>2</sub> eq/€)                                 | 3,85          |

The complete net revenue was used to calculate GHG intensity, see section 1.1.

### E1-8 Internal carbon pricing

There is no internal carbon-pricing scheme.

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## **E1-9 Anticipated financial effects from material physical and transition risks and potential climate related opportunities**

Since there is no climate risk analysis available, no conclusions about financial effects are made. ESIM will include further information after completion of the analysis and in compliance with the applicable reporting timelines.

## **2.3 Pollution**

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### **ESRS E2**

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#### **E2.IRO-1 Description of the processes to identify and assess material pollution related impacts, risks and opportunities**

The process outlined in section 1.1. was applied for the materiality assessment. Internal experts for environment, waste, regulatory affairs and wastewater, as well as supply chain matters participated and knowledge from our internal risk management process has been incorporated into a comprehensive approach that covers our own operations and our value chain.

Our material matters are Pollution to air and water, Substances of concern and substances of very high concern.

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#### **E2-1 Policies related to pollution**

ESIM's Environmental Policy, which is also part of the integrated management system, defines our ambitions concerning the protection of the environment and continuous improvement of our performance in this matter. It demands the management system and internal reporting that is achieved according to ISO 14001. The policy covers our own operations and is signed off by the CEO. Our sustainability policy encourages all employees to reduce harmful working materials as far as technically possible. Additionally, a hazard prevention plan is in place that includes procedures in the case of LOPC (loss of primary content).

All policies are made available to our employees via Intranet and noticeboard.

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#### **E2-2 Actions and resources related to pollution**

At ESIM, we are committed to improving our environmental performance. Our goals are the reduction of emissions to air and the reduction of hazardous wastewater components. Measures are defined in agreement with local authorities for all manufacturing processes. One example is the installation of an additional activated carbon filter unit to reduce the VOC (volatile organic compounds) emissions to air. This task was completed in 2024.

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#### **E2-3 Targets related to pollution**

The manufacture of chemicals in Austria is a highly regulated business area with strict provisions defined by national, regional and European legislation, such as EU BAT (Best Available Technique). All our projects require a dedicated permit from local authorities that include, among other things, discharge limits to air and wastewater. The set thresholds correspond to the legal requirements as well as to the state of the art. Emissions to air and wastewater are monitored regularly and in detail and compared with the official thresholds.

Furthermore, our compliance is tracked via our compliance management system



(software) and internal KPIs. No additional targets have been defined.

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

### Wastewater emissions

Table 10 contains information on wastewater emissions from ESIM. The emitted loads were analytically collected at the on-site wastewater treatment plant effluent measuring point and then allocated to the companies using a site-wide, agreed allocation key.

Table 10: Wastewater emissions

|  | Unit | 2022        | 2023        | 2024        |
|--|------|-------------|-------------|-------------|
| Filterable substances (effluent)                                 | kg/a | 76.516,3    | 93.812,7    | 73.359,0    |
| Ammonium (as N) (effluent)                                       | kg/a | 41.427,6    | 25.344,6    | 26.224,5    |
| AOX (effluent)   | kg/a | 21,6        | 8,3         | 84,6        |
| Boron (effluent)   | kg/a | 5,2         | 7,9         | -           |
| BSB5 (with nitrification inhibition) (effluent)                  | kg/a | 33.510,2    | 23.870,1    | 19.227,2    |
| BTX(E) (effluent)  | kg/a | 0,118       | 0,2         | 0,1         |
| Chloride (effluent)  | kg/a | 232.870,0   | 918.613,5   | 868.648,3   |
| Chromium (effluent)  | kg/a | 15,3        | 21,0        | 6,4         |
| COD - chemical oxygen demand (effluent) *                        | kg/a | 239.148,0   | 308.639,1   | 244.218,2   |
| Copper (effluent)  | kg/a | 2,1         | 5,0         | 2,6         |
| Nickel (effluent)  | kg/a | 5,9         | 12,2        | 3,8         |
| Nitrate (as N) (effluent)  | kg/a | 492,3       | 1.800,0     | 160,8       |
| Nitrite (as N) (effluent)  | kg/a | 7.050,7     | 18.369,1    | 3.618,2     |
| Phenol index (effluent)  | kg/a | 0,4         | 7,4         | 13,7        |
| Nitrogen (total bound nitrogen (TNb) calculated as N) (effluent) | kg/a | 59.813,1    | 53.504,2    | 32.842,9    |
| Sulfate (as SO <sub>4</sub> ) (effluent)                         | kg/a | 3.252.499,4 | 3.116.051,3 | 2.217.302,5 |
| Total hydrocarbons, KW-Index (effluent)                          | kg/a | 14,5        | 16,9        | 13,2        |
| Zinc (effluent)  | kg/a | 7,2         | 12,2        | 6,2         |

The measurements follow the national protocol for analytical methods and are subject to approval by the government of Upper Austria. The loads leaving this on-site treatment plant are sent to the Linz-Asten municipal sewage treatment plant for further treatment.

### Emissions to air

All emissions to air from our manufacturing processes are collected and fed into appropriate purification systems. The most common form of treatment is incineration.

The waste gas incineration plants operate with natural gas support and, where possible, the waste heat is used to generate energy (steam).

The incineration plants are monitored and controlled. All emissions from the waste gas treatment systems are recorded in accordance with the official requirements.

Table 11 shows the loads for relevant exhaust air parameters. The amount of CO<sub>2</sub> is disclosed in section 2.2 Climate Change.

All numbers refer to the production site in Linz, Austria. Changes compared to previous years are primarily due to changes in manufactured product mix and tonnage. The measurements are conducted according to the methods and frequency prescribed by local authority in the relevant decisions and the values are recorded in the local emissions inventory Emissionskataster - EMIKA).



Table 11: Emissions to air

|                                       | unit | 2022 | 2023 | 2024 |
|---------------------------------------|------|------|------|------|
| Dust                                  | t/a  | 0,05 | 0,06 | 0,03 |
| NO <sub>x</sub>                       | t/a  | 2,88 | 2,37 | 2,87 |
| CO                                    | t/a  | 0,11 | 0,05 | 0,05 |
| VOC                                   | t/a  | 3,79 | 2,29 | 2,37 |
| NH <sub>3</sub>                       | t/a  | 0,08 | 0,11 | 0,02 |
| Total<br>(excluding CO <sub>2</sub> ) | t/a  | 6,91 | 4,88 | 0,03 |

The compilation of the above data on wastewater and emissions to air fulfills the requirement for the publication of emission data in accordance with §13 (1) Umweltinformationsgesetz (Austrian Environmental Information Act). The disclosure exceeds the information required by European regulation (EC) 166/2006 ePRTR.

The changes in quantities over time are due to the change in product mix and improvement projects.

## E2-5 Substances of concern and substances of very high concern

Information on SoC and SVHC will be included according to the applicable reporting timelines.

## E2-6 Anticipated financial effects from pollution related impacts, risks and opportunities

No major incidents and deposits in connection with pollution occurred in 2023, therefore no related OpEx and CapEx are to be reported. The anticipated financial effects of risks and opportunities will be included according to the official reporting timelines in future reports.

# 2.4 Resource Use and Circular Economy

## ESRS E5

### E5.IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

The process outlined in section 1.1. was applied for the materiality assessment. Internal experts for environmental, waste and supply chain matters participated and knowledge from our internal risk management process has been incorporated into a comprehensive approach that extends from the inflow of resources to our products and waste. We are working on gaining a better understanding of the lifecycle of our products to include this information in our materiality assessment in the future.

Our material matters are Resource inflows and waste.

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

Our guidelines for sustainable procurement are based on the principles of the UN Global Compact. It includes the expectations we have of our suppliers and is taken into account in tenders and contract award decisions. The guideline is complemented by our Supplier Code of Conduct. Both documents are implemented by the director of supply chain management.

Our waste management policy covers the handling of residual materials, by-products, waste and wastewater that arise during or after production (e.g. out-of-spec material, leftover raw materials, used catalysts). The policy is in compliance with Austrian waste regulations including the waste hierarchy according to AWG 2002 (Waste prevention > preparation for reuse > recycling > other

recovery, e.g. energy recovery > disposal). The managing director under waste law is accountable for the implementation and adaptation of this policy.

The avoidance of waste is a priority to us, which is considered when purchasing raw materials or equipment and selecting or adapting processes. When purchasing external services, care is taken to ensure that the contracted companies separate and dispose of their waste and dispose of their waste properly themselves and that contractual regulations on waste disposal are made. Waste is also addressed by the environmental management system implemented at ESIM.

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

One key-Action is the reduction of waste across our entire operation. Our continuous improvement process allows us to take targeted measures that are implemented in the frame of improvement projects, development projects or investment projects. One major achievement is the reduction of waste per 80 % per kg of product compared to 2019 (completed in 2024) for one manufacturing process. A project on the reduction of cooling water was completed in 2024.

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

We concentrate on the optimization of each manufacturing process rather than our total annual quantity of waste because the latter relies heavily on the product mix and overall utilization of our manufacturing capacities. No absolute time-bound targets have been set by now.

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#### **E5-4 – Resource inflows**

The overall total weight of products and materials used during the reporting period is not available for 2024. However, the numbers shall be determined and included in future reports in alignment with the ESRS.

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#### **E5-5 – Resource outflows**

A large part of waste generated by ESIM Chemicals GmbH is hazardous waste (>98%) which is composed of organic and inorganic chemicals often mixed with water. The non-hazardous portion consists mainly of wood from pallets and plastic or paper packaging materials.

The most significant waste streams are mixtures of organic or aqueous solvents, either with halogens or not. Additionally, aqueous concentrates or solutions of salts and solid organic chemicals and contaminated packaging materials are of relevance as well.

The waste consists mainly of organic chemicals, water, activated charcoal and precious metals in catalysts. Precious metal catalyst materials are always recovered and prepared for reuse. All waste materials generated are classified according to the Austrian Waste Management Act (“Abfallwirtschaftsgesetz”) and the waste catalog regulation (“Abfallverzeichnisverordnung”). The respective amounts per category are then allocated to the relevant entry in Table 12.

No radioactive waste was generated in 2024 at ESIM.

Table 12: Waste

| WASTE in metric tons per year   | 2022    | 2023    | 2024     |
|---|---------|---------|----------|
| Waste generated   | 8090,60 | 6690,51 | 6.036,04 |
| Hazardous waste diverted from disposal                                      | 2,05    | 38,15   | 202,58   |
| Hazardous waste diverted from disposal due to preparation for reuse         | 0       | 32,12   | 0        |
| Hazardous waste diverted from disposal due to recycling                     | 2,05    | 6,03    | 202,58   |
| Hazardous waste diverted from disposal due to other recovery operations     | 0       | 0       | 0        |
| Non-hazardous waste diverted from disposal                                  | 118,21  | 78,14   | 46,14    |
| Non-hazardous waste diverted from disposal due to preparation for reuse     | 0       | 0       | 0        |
| Non-hazardous waste diverted from disposal due to recycling                 | 118,21  | 78,14   | 46,14    |
| Non-hazardous waste diverted from disposal due to other recovery operations | 0       | 0       | 0        |
| Hazardous waste directed to disposal  | 7901,25 | 6510,65 | 5.743,29 |
| Hazardous waste directed to disposal by incineration                        | 7901,25 | 6401,28 | 5.743,29 |
| Hazardous waste directed to disposal by landfilling                         | 0       | 109,37  | 0        |
| Hazardous waste directed to disposal by other disposal operations           | 0       | 0       | 0        |
| Non-hazardous waste directed to disposal                                    | 69,10   | 63,57   | 44,04    |
| Non-hazardous waste directed to disposal by incineration                    | 69,10   | 63,57   | 44,04    |
| Non-hazardous waste directed to disposal by landfilling                     | 0       | 0       | 0        |
| Non-hazardous waste directed to disposal by other disposal operations       | 0       | 0       | 0        |
| Non-recycled waste  | 7970,35 | 6574,22 | 5.787,33 |
| Percentage of non-recycled waste  | 98,5 %  | 98,2 %  | 95,9%    |

#### **E5-6 – Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities**

The anticipated financial effects from resource use and circular economy-

related impacts, risks and opportunities will be included in future reports according to the official reporting timelines.

# 3 Social Information

Sustainability Statement 2024

## 3.1 Own Workforce

ESRS S1

### **S1.SBM-2 Interests and views of stakeholders**

See section 1.1 General Disclosures - SBM-2.

### **S1.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model**

ESIM's own workforce consists of employees and workers who are in a contractual agreement with ESIM Chemicals GmbH or ESIM Holdings und Management Services GmbH, as well as personnel provided by third parties. Most employees are situated in Linz, Austria with only two employees situated in our sales office in Frankfurt, Germany. The following disclosures will not be reported separately by country as this might allow conclusions to be drawn about the employment contracts of individual persons.

ESIM recognizes that the skills, knowledge and awareness of all employees are key to the achievement of our objectives. We want to attract and retain talents to secure and advance our know-how. Our material matters are

working conditions and equal treatment for all.

Employee safety is an important objective and actions derived are also implemented for personnel provided by third parties, where applicable.

### **S1-1 Policies related to own workforce**

Our HR Management Policy aims to ensure that motivated and committed employees with the required qualifications for current and future tasks are employed in the company. It contains the corresponding processes and objectives and is implemented by the HR Manager. The policy respects national law and is ACCESSIBLE to all employees via our DOCUMENT MANAGEMENT SYSTEM ON THE Intranet. It is complemented by ESIM's Code of Conduct, which outlines our general principles and ambitions concerning ethical corporate governance including our engagement against discrimination.

Our health and safety policy encompasses our ambitions in relation to health and safety in our operations, such as the implementation of our ISO

45001 health and safety management system and the equal consideration of ESIM's own employees and those provided by third parties in all related matters. The policy is issued by management and made available to all employees via our Document Management System on the intranet.

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

At ESIM the engagement with own workers and workers' representatives takes place in various interfaces. We share information internally via town-hall meetings, Intranet news and newsletter or individual communications. An employee well-being survey is conducted at appropriate intervals. Our workers' representatives participate in monthly meetings with the executive team and HR Management and are also part of the advisory board.

The effectiveness of engagement with ESIM's own workforce is reflected in the own-termination rate measured by HR Management.

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

ESIM employees have several ways of expressing concerns or drawing attention to grievances. They can contact the appointed safety officers, the works council or their supervisor directly. In addition, a whistleblowing system has been installed to enable anonymous complaints about

discrimination. The mechanism behind our whistleblowing system is explained in the governance section. All cases raised through other channels are handled individually in accordance with our code of conduct.

In Austria, there are other independent institutions available that support workers, such as the Austrian Federation of Trade Unions (Österreichischer Gewerkschaftsbund; ÖGB) or the Chamber of Labor (Arbeiterkammer; AK).

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

The actions are derived from our management system and their effectiveness is measured by appropriate KPIs, such as the safety metrics outlined in section S1-14 or the own-termination rate. The resources available for this purpose include the HR team and a dedicated safety officer.

Table 13 lists the relevant actions (see page 21).

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**S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities**

No measurable time-bound targets concerning our material matters related to our own workforce are available.

Tabelle 12: Actions related to own workforce

| Action   | Scope  | Year                |
|--|--|---------------------|
| Safety management according to ISO 45001   | own employees, personnel provided by third parties and contractors | continuous          |
| Project to raise awareness and improve our safety performance  | own employees  | 2024/2025 - ongoing |
| ESIM dialogue on employee development (Entwicklungsgespräch)   | own employees  | continuous          |
| Buddy System for talents joining the company   | own employees  | continuous          |
| Bike leasing   | own employees  | continuous          |
| In 2023 all employees received a so-called inflation bonus to compensate for the high inflation at the time. | own employees  | 2023 - completed    |
| self-defense course for women  | own employees  | 2023 - completed    |

### S1-6 Characteristics of the undertaking's employees

The characteristics of ESIM's employees per 31.12.2024 are as follows:

Number of employees per gender (head count):

Table 13: Employee Characteristics

| Gender       | 2024 |
|--------------|------|
| Female       | 48   |
| Male         | 293  |
| Other (*)    | 0    |
| Not reported | 0    |
| Total        | 341  |

(\*) Gender as specified by the employees themselves

Number of employees per contact and gender (head count – all countries):

Shift workers are engaged in the frame of a 5-shift-modell (35h/week) and considered part-time employees per definition.

In the course of 2024, 19 employees left the company. The fluctuation rate is calculated as a rolling average over the last 12 months, excluding retirements. The fluctuation rate is 5.5 % as of 31.12.2024.

Table 14: Employee contracts

|  | 2024   |      |       |              |       |
|--|--------|------|-------|--------------|-------|
| Gender                                   | female | male | other | Not reported | total |
| Number of employees                      | 48     | 293  | 0     | 0            | 341   |
| Number of permanent employees            | 48     | 293  | 0     | 0            | 341   |
| Number of temporary employees            | 0      | 0    | 0     | 0            | 0     |
| Number of non-guaranteed hours employees | 0      | 0    | 0     | 0            | 0     |
| Number of full-time employees            | 25     | 146  | 0     | 0            | 171   |
| Number of part-time employees            | 23     | 147  | 0     | 0            | 170   |

### S1-7 Characteristics of non-employee workers in the undertaking's own workforce

The majority of non-employee workers at ESIM are supervised workers which are engaged indirectly via an employment agency and work in production, logistics and technical departments. The following table shows the number of non-employee workers as of 31.12.2024 (head count).

Table 15: Non-employee workers

| Number of non-employee workers  | 2024 |
|---|------|
| Total number of non-employee workers in own workforce   | 5    |
| Total number of non-employee workers in own workforce - self-employed workers   | 0    |
| Total number of non-employee workers in own workforce - workers provided by undertakings primarily engaged in employment activities | 5    |

### S1-8 Collective bargaining coverage and social dialogue

100% of ESIM employees are covered by a collective bargaining agreement, excluding the CEO. Personnel provided by third parties is treated equally and must not be placed at a disadvantage compared to the collective bargaining agreement.

At the company site in Linz, Austria 100% of employees are represented by our works council.

There is no agreement with the European Works Council (EWC), Societas Europaea (SE) Works Council, or Societas Cooperativa Europaea (SCE) Works Council in place.

### S1-9 Diversity metrics

The following table shows the age distribution of all employees including the executive team.

Table 16: Diversity metrics

| Number of employees                                 | 2024    |
|---|---------|
| Under 30 years old                                  | 88      |
| Percentage of employees under 30 years old          | 25,81 % |
| Between 30 and 50 years old                         | 185     |
| Percentage of employees between 30 and 50 years old | 54,25 % |
| Over 50 years old                                   | 68      |
| Percentage of employees over 50 years old           | 19,94 % |

Table 18 shows the diversity metrics at top management level. The top management level is defined as the executive team.

Table 17: Diversity at top management level

| Number of employees top management level | 2024    |
|--|---------|
| Female                                   | 1       |
| % of total at top management level       | 16,67   |
| Male                                     | 5       |
| % of total at top management level       | 83,33 % |
| Other gender                             | 0       |
| % of total at top management level       | 0       |
| No data                                  | 0       |
| % of total at top management level       | 0       |
| Total                                    | 6       |

### S1-10 Adequate wages

There is no statutory minimum wage in Austria. However, the Austrian Chamber of Commerce and the Austrian Trade Union Federation (ÖGB) have agreed that no minimum wage in a collective bargaining agreement should be less than EUR 1,500 per month. This is applicable to all employees except for apprentices in their first and second year.

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**S1-11 Social protection**

Social protection concerning illness, unemployment, work related accidents and disability, parental leave and pension is regulated by national law in Austria. Therefore, employees are covered by adequate social protection.

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**S1-12 Persons with disabilities**

At ESIM 0,88 % of employees have a disability as per 31.12.2024. The calculation is based on the definition of disability according to the Austrian Ministry of Social Affairs (Feststellungsbescheid).

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**S1-13 Training and skills development metrics**

All employees participate in annual personnel development reviews, which are an integral part of every manager's leadership duties. Employees spend an average of 6,8 hours per year completing internal mandatory online training sessions via our Training Management System. Additionally, 4,51 hours per employee per year are dedicated to voluntary external training activities.

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**S1-14 Health and safety metrics**

All employees are covered by our safety management system according to ISO 45001 and national law. The ISO certification is audited annually with an extended evaluation every three years.

The number of days lost due to work-related injuries, accidents or ill health will be included in future reports.

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**S1-15 Work-life balance metrics**

All employees are entitled to take family-related leave based on national law that is also reflected in the collective bargaining agreement. In 2024 4,11 % of employees took family-related leave.

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**S1-16 Compensation metrics (pay gap and total compensation)**

ESIM has not calculated the gender pay gap and the annual total remuneration ratio yet. This information will be included in future reports in compliance with the official reporting timelines.

Table 18: Health & safety metrics

| 2024   | Employees | Non-employees |
|--|-----------|---------------|
| Percentage of own workers who are covered by health and safety management system based on legal requirements and (or) recognized standards or guidelines | 100%      | 100%          |
| Number of fatalities in own workforce as result of work-related injuries and work-related ill health   | 0         | 0             |
| Number of fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites                      | 0         | 0             |
| Number of recordable work-related accidents for own workforce (OSHA)   | 4         | 0             |
| Rate of recordable work-related accidents for own workforce  | 8,19      | 0             |
| Number of cases of recordable work-related ill health of own workforce   | 0         | 0             |



# Workers in the Value Chain

## ESRS S2

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### **S2.SBM-2 Interests and views of stakeholder**

See section 1.1 General Disclosures - SBM-2.

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### **S2.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model**

The process outlined in section 1.1 was applied for the materiality assessment. We operate as part of an international value chain that changes frequently depending on our current projects. Value chain workers are located at our suppliers and customers' facilities as well as our own operations. The chemical industry is known to own a high-risk profile for health & safety matters

Our material matters are value chain workers - working conditions and value chain workers - equal treatment & opportunity for all.

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### **S2-1 Policies related to value chain workers**

Our policy for sustainable procurement covers environmental, social and governance matters and must be considered during the qualification process of new suppliers. The director of supply chain management is responsible for the implementation of the policy.

Moreover, there is a code of conduct for our suppliers in place that is also publicly available via our website.

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### **S2-2 Processes for engaging with value chain workers about impacts**

There is no process in place to engage with value chain workers or credible proxies.

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### **S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns**

ESIM Chemicals is committed to an open and transparent corporate culture. External stakeholders are provided with the opportunity to anonymously report concerns or potential breaches of legal or ethical standards through a whistleblower link accessible on our website.

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### **S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action**

Safety measures are in place for all workers at our site in Linz, Austria. No additional measures related to value chain workers are in place.

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### **S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities**

No targets related to value chain workers have been defined.

# 4 Governance

Sustainability Statement 2024

## 4.1 Business Conduct

ESRS G1

### **G1.GOV-1 The role of the administrative, supervisory and management bodies**

ESIM executives and management are obliged to ensure that the employees reporting to them have carefully read and understood the Code of Conduct. The experience of our executive team is outlined in section 1.1.

### **G1.IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities**

The process outlined in section 1.1 was applied for the materiality assessment. Internal experts from various disciplines participated and knowledge from our internal risk management process has been incorporated into a comprehensive approach that covers our own operations. Our material matters are corporate culture and management of relationships with suppliers.

### **G1-1 Business conduct policies and corporate culture**

ESIM's Code of Conduct defines the general principles of ethical corporate governance that are established and implemented by ESIM. HR is responsible for its implementation and is advised by the works council and the legal counsel. The

Code takes international frameworks such as the UN Global Compact and the Universal Declaration of Human Rights and the European Convention on Human Rights into account.

The ESIM Group Compliance Handbook complements the Code of Conduct and is equally binding to all employees and management bodies. It aims to ensure the compliance with applicable Austrian and European law (including UK Bribery Act) and other jurisdictions (e.g. US Foreign Corrupt Practices Act "FCPA"). The CEO is responsible for its implementation.

Both documents are made available to all employees via our Document Management System on the Intranet, and mandatory trainings covering its content are regularly conducted via our Training Management System.

A whistleblower system is implemented that offers a channel to raise concerns about unlawful behavior, discrimination and other concerns addressed by the directive EU 2019/1973. The system prescribes a clear process how these concerns are handled and how the whistleblower is protected.

ESIM's corporate culture is reflected in our value tree. These are the qualities and ideals that are important and valuable to us, that we act on and that we strive to achieve.

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**G1-2 Management of relationships with suppliers'**

ESIM operates an international supply chain. Due to our business model, there is a constant change in suppliers based on the current projects we work on. The procurement process is part of our integrated management system and

complemented by our policy for sustainable procurement, which is based on the principles of the UN Global Compact covering environmental, social and governance matters and must be considered during the qualification process of new suppliers. Moreover, there is a code of conduct for our suppliers in place that is also publicly available via our website.