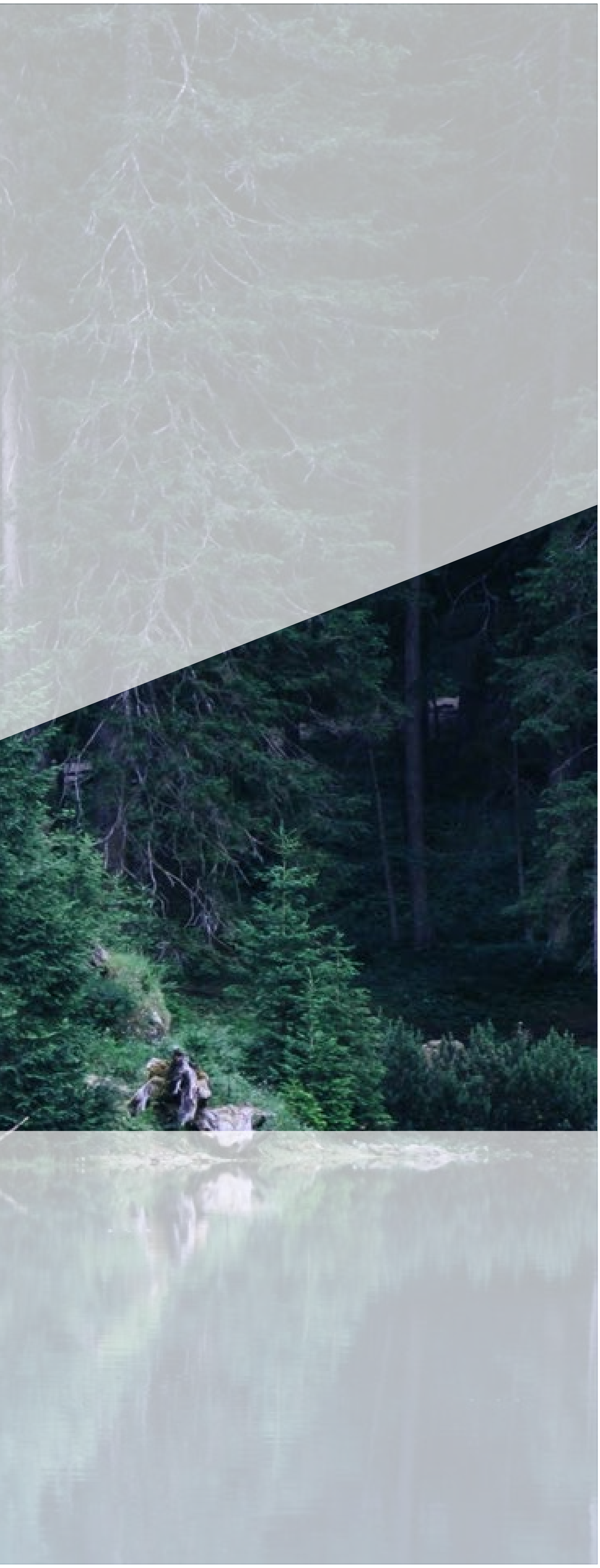
# Delivering meaningful growth

ANNUAL REPORT 2024 – VOLUME 2
SUSTAINABILITY STATEMENT



CHAPTER 7

# Sustainability statement

# 7.1 Basis for preparation statement

## 7.1.1 Regulatory environment

In accordance with the Accounting Directive (EU) 2013/34, as amended, including by the Corporate Sustainability Reporting Directive (EU) 2022/2664 ("CSRD") as implemented into Belgian law pursuant to the law of December 2, 2024 on the disclosure of sustainability information by certain companies and groups and the assurance of sustainability information and containing miscellaneous provisions, and the European Sustainability Reporting Standards ("ESRS") adopted pursuant to Commission Delegated Regulation (EU) 2023/2772, Groupe Bruxelles Lambert SA/NV ("GBL") has prepared its first consolidated sustainability statement relating to the financial year starting on January 1, 2024 and ending on December 31, 2024. In this sustainability report, GBL and its consolidated subsidiaries are referred to as the "group".

Considering the provisions of ESRS 1 §54, §55 and §110, GBL decided to structure its consolidated sustainability statement on a disaggregated basis of the reported information in order to ensure a proper understanding of the group's impacts on sustainability matters and how sustainability issues influence the group's growth, performance, and position in terms of risks and opportunities. This is further explained below.

Market practice on the application and interpretation of certain terms under the CSRD, its implementing legislation and the ESRS has not yet settled as these rules have only recently been introduced. It may therefore be that as market practice develops around this, and the CSRD, its implementing legislation and the ESRS are developed further, our disclosures may evolve.

Notwithstanding some uncertainties around the application in practice of the CSRD, its implementing legislation and the ESRS, GBL has made its best efforts to collect reliable data mandated by the applicable rules. The CSRD related disclosures presented in this sustainability statement are made on the basis of GBL's best understanding of the terms and concepts used under the CSRD, its implementing legislation and the ESRS (as the case may be, as clarified by, among others, the European Commission, the EFRAG and Belgian competent authorities).

In accordance with ESRS 1, §105 and §106 and ESRS 2 §5(d), no disclosure is provided of either (i) classified information or sensitive information and (ii) information corresponding to intellectual property, knowhow or the results of innovation if it (a) is secret in the sense that it is not, as a body or in the precise configuration and assembly of its components, generally known among or readily accessible to persons within the circles that normally deal with the kind of information in question, (b) has commercial value because it is secret and (c) has been subject to reasonable steps to keep it secret. In such case, the sustainability report, however, includes all other required information of the relevant disclosure requirement (in accordance with ESRS 1, §107) and GBL has made every reasonable effort to ensure that beyond the omission of the classified information or sensitive information, or of the specific piece of information corresponding to intellectual property, knowhow or the results of innovation, the overall relevance of the disclosure in question is not impaired (in accordance with ESRS 1, §108).

Finally, in accordance with Article 29a(3) of the Accounting Directive and Article 3:32/3, §5 of the Belgian Companies and Associations Code, information relating to impending developments and matters in the course of negotiation is not disclosed where, in the duly justified opinion of the Board of Directors of GBL, the disclosure of such information would be seriously prejudicial to the commercial position of the group, taking into account that such omission cannot prevent a fair and balanced understanding of the group's development, performance, and position, and the impact of its activity.

## 7.1.2 GBL's responsible management approach

GBL is an established investment holding company, with over seventy years of stock exchange listing. As a leading European investor, focusing on long-term and sustainable value creation and relying on a stable and supportive family shareholder base, GBL strives to maintain a diversified high-quality portfolio composed of global companies, leaders in their sector, in which it can contribute to value creation by being an engaged professional investor.

As an investment holding company, GBL has adopted a dual approach in structuring its consolidated sustainability statement on a disaggregated basis, deriving directly from its twofold responsibility and approach to investments:

- GBL as *Responsible Company* (also referred to as "Responsible Corporate"), consisting of the parent company GBL and its direct and indirect subsidiaries having, as their main activity, the management of investments. In this respect, GBL has potential sustainability impacts, risks and opportunities linked to its role as an employer and contributor to the communities in which it operates;
- GBL as *Responsible Investor*, which encompasses the companies within GBL's portfolio (whether controlled or not, including GBL Capital's portfolio). Those companies identify and address their sustainability impacts and associated risks and opportunities within the framework of their own internal controls and governance. Paramount in the sustainability strategy and business model of GBL in this context is the ESG integration approach implemented through the investment cycle (pre-/post investment phase), independently of the characteristics of the assets (whether controlled or not).

GBL's responsible management approach is thus structured at each level of responsibility mentioned above with, in each case, (i) the identification of the most relevant stakeholders and (ii) the double materiality assessment (hereinafter referred to as the "DMA") undertaken in accordance with the ESRS.

## 7.1.3 Scope

In accordance with ESRS 1 §102 and ESRS 2 §5(b), GBL confirms that the scope of consolidation of GBL's consolidated sustainability statement is aligned with that of GBL's consolidated financial statements. The required reporting at consolidated level for the consolidated group is presented in Part II of this consolidated sustainability statement.

Table 01 below summarizes the undertakings and assets that are covered by GBL's consolidated sustainability statement, covering both the consolidated group as well as the value chain.

| GBL as a responsible company | GBL as a responsible investor |
|---|---|
| *GBL and its direct and indirect 100% owned subsidiaries having, as their main activity, the management of investments*<br><br>– Parent company: GBL SA<br>– Direct and indirect 100% owned subsidiaries related to the holding segment[1]: GBL Verwaltung (LUX), GBL Advisors (UK), RPCE (FR), GBL Advisors (IT), GBL Advisor DE[2]<br>– Direct and indirect owned subsidiaries related to the GBL Capital segment[3]: GBL Capital (UK), Sienna Private Equity (FR), Sienna Venture Capital (FR) | *Consolidated assets*<br><br>– Listed: Imerys<br>– Private: Affidea, Canyon, Sanoptis<br>– Sienna Investment Managers ("SIM")<br><br>*Non-consolidated assets*<br><br>– Listed: adidas, Concentrix, Ontex, Pernod Ricard, SGS, Umicore<br>– Private: Parques Reunidos, Voodoo<br>– GBL Capital's portfolio |

Table 01 – Scope of GBL's consolidated sustainability statement

As at the date of this sustainability report, none of GBL's subsidiaries falling within the CSRD reporting obligations are relying on an exemption from reporting in respect of the financial year starting on or after January 1, 2024 based on these being covered by this consolidated sustainability report.

The scope of the consolidated sustainability statement encompasses GBL's subsidiaries (including those in the investment portfolio mentioned under "GBL as a responsible investor") and, in accordance with ESRS 1 §63, it provides information on the material impacts, risks and opportunities connected with GBL through its business relationships in its value chain (including relating to its non-controlled participations). In accordance with ESRS 2 §5(c), the consolidated sustainability statement also encompasses the group's upstream and downstream value chain other than the non-controlled participations.

## 7.1.4 GBL's sustainability statement structure

In accordance with the provisions of ESRS 1 §103 and §104 and EFRAG IG 1[4] §130, and aligned with the dual responsible management approach presented above, GBL has opted for a hybrid and disaggregated approach in the performance of its DMA exercise: the first approach which contributes to define the impacts, risks & opportunities ("IROs") that are material for GBL as *Responsible Company* considering its investment activities and the second approach applied by GBL as *Responsible Investor* for IROs that are specific to the controlled participations and which are therefore not widespread across the group.

Referring to the requirements of ESRS 1 §115 and ESRS 1 Appendix B QC19, GBL has structured its consolidated sustainability statement under this hybrid approach and as a coherent whole in two main parts:

Part I of GBL's sustainability statement covers GBL as a *Responsible Company (GBL holding and direct and indirect 100% owned subsidiaries)* and is subdivided into four sections:

(i) the general information with the disclosure requirements in accordance with ESRS 2 and the DMA;

(ii) the environmental information, including the disclosures required pursuant to the Taxonomy Regulation (EU) 2020/852;

(iii) the social information; and

(iv) the governance information.

Each ESG section mentioned above is articulated around general disclosures, material IROs and metrics and targets.

Part II of GBL's sustainability statement is dedicated to GBL's portfolio participations (controlled and non-controlled) covering GBL's mission as a Responsible Investor and is subdivided into three sections:

Part II Section 1 is dedicated to ESG integration[5] and GBL holding's role in the supervision of entity-specific sustainability topics. As a long-term investor, understanding ESG issues enables GBL to reduce negative impacts and risks and identify positive impacts or opportunities from our current and new portfolio investments. The ESG integration represents the convergence between the aggregated approach at a consolidated level and the disaggregated approach applied at the level of each controlled participation. It also constitutes the interface between the aggregated approach in regards of the non-controlled participations.

1 A full list of the consolidated subsidiaries of GBL (with "holding" as their main activity) and which are covered by the consolidated sustainability statement is available in Note 6.1.7 of the consolidated financial statements
2 GBL Advisors DE is an advisory entity with no activity and no turnover as at the date of this sustainability report
3 A full list of the consolidated subsidiaries of GBL (with "GBL Capital and SIM" as their main activity) and which are covered by the consolidated sustainability statement is available in Note 6.1.7 of the consolidated financial statements
4 Implementation guidance of EFRAG on the materiality assessment
5 The Principles for Responsible Investment (PRI) defines ESG integration as "the explicit and systematic inclusion of ESG issues in investment analysis and investment decisions"

Part II Section 2 and Part II Section 3 are dedicated to sustainability disclosures related to GBL's portfolio participations. In this respect, a distinction is made between the controlled and the non-controlled participations based on the ESRS' applicable disclosure requirements.

Part II Section 2 covers controlled participations as well as the required sustainability information prepared on a consolidated basis (aligned with the scope of GBL's consolidated financial statements). Considered as subsidiaries requiring disclosure on a consolidated basis in accordance with ESRS 1 §62 and ESRS 2 §5(b), controlled participations together with GBL and its other subsidiaries are included in the perimeter of GBL's consolidated sustainability statement. From that perspective, Part II Section 2 is subdivided into three sub-sections:

i) the consolidated disclosure requirements (general information), including a presentation of the consolidated disclosure requirements covering the topics and sub-topics deemed material and relevant across the group for a faithful and understandable comprehension, taking into consideration the differentiated mix of activities of the controlled participations (as further detailed in paragraph §7.3.2.1 General information, page 53). This exercise is performed through the mapping of the IROs identified through the DMA exercise at GBL's corporate level and at each controlled participation's level in combination with the assessment performed through the ESG integration; the outcome of the DMAs performed at each controlled portfolio company's level is also presented on a disaggregated basis in this sub-section;

ii) the consolidated disclosure requirements (environmental, including the disclosures required pursuant to the Taxonomy Regulation (EU) 2020/852, social and governance) when relevant; and

iii) a link to the disclosure requirements specific to these controlled portfolio companies (notably in terms of targets, metrics and policies, and actions) by referencing their respective sustainability statements prepared in accordance with the ESRS, which are reproduced in full in the Appendix of GBL's consolidated sustainability statement.

The sustainability reports of these controlled portfolio companies as presented in the Appendix of this consolidated sustainability statement form an integral part of the consolidated sustainability statement. Those portfolio companies are, as at the date of this sustainability report: Imerys (listed asset) and Affidea, Canyon, Sanoptis (private assets) and Sienna Investment Managers.

Part II Section 3 covers non-controlled portfolio participations' disclosure requirements. In accordance with ESRS 1 §63, EFRAG IG 2[1] §28, §67 and §66, non-controlled portfolio participations (being listed or private portfolio companies, including GBL Capital's portfolio) are considered as GBL's business relationships. Non-controlled portfolio participations are therefore included in GBL's value chain as investments and as such are subject to mandatory specific disclosures, particularly with regards to scope 3 GHG emissions. This section also covers the disclosure requirements in respect of the group's upstream and downstream value chain beyond the non-controlled portfolio participations.

1 Implementation guidance of EFRAG on the value chain

## 7.1.5 Alignment with ESRS requirements

Table 01 below summarizes the structure of GBL's consolidated sustainability statement and its alignment with the ESRS requirements.

| | Sustainability statement (ESRS 1 §115) | General information | Env. disclosures | Social disclosures | Governance disclosures | Entity Specific disclosures |
|---|---|---|---|---|---|---|
| | *ESRS considered* | *ESRS 2* | *ESRS E1* | *ESRS S1* | *ESRS G1* | *ES* |
| **7.1** | **Basis for preparation** | **page 4** | | | | |
| **7.2** | **Part I – GBL holding** | **page 9** | | | | |
| 7.2.1 | General information | page 9 | | | | |
| 7.2.1.8 | Double Materiality Analysis | page 12 | | | | |
| 7.2.2 | Environmental information | | page 24 | | | |
| 7.2.3 | Social information | | | page 34 | | |
| 7.2.4 | Governance information | | | | page 44 | |
| 7.2.5 | Philanthropy | | | | | page 46 |
| **7.3** | **Part II – GBL consolidated** | **page 53** | | | | |
| 7.3.1 | ESG integration | | | | | page 47 |
| 7.3.2 | Controlled participations | page 53 | | | | |
| 7.3.2.1 | General information | page 53 | | | | |
| 7.3.2.2 | Consolidated Double Materiality Analysis | page 53 | | | | |
| 7.3.2.3 | Consolidated environmental information (inc. Taxonomy) | | page 65 | | | |
| 7.3.2.4 | Consolidated social information | | | page 77 | | |
| 7.3.2.5 | Consolidated governance information | | | | page 78 | |
| 7.3.2.6 | Controlled participations' sustainability statements | page 78 | | | | |
| 7.3.3 | Non-controlled investments | page 79 | | | | |
| 7.3.3.1 | GHG disclosures | | page 79 | | | |
| 7.3.3.2 | SBTi coverage | | page 80 | | | |
| **7.4** | **APPENDIX** | **General information** | **Env. disclosures** | **Social disclosures** | **Governance disclosures** | **Entity Specific disclosures** |
| | *ESRS considered (when relevant)* | *ESRS 2* | *ESRS E1, E2, E3, E4, E5* | *ESRS S1, S2, S3, S4* | *ESRS G1* | *ES* |
| 7.4.1 | Appendix I – Affidea | page 81 | page 105 | page 123 | page 175 | - |
| 7.4.2 | Appendix II – Sanoptis | page 186 | - | page 207 | - | page 225 |
| 7.4.3 | Appendix III – Canyon | page 228 | page 257 | page 292 | page 333 | - |
| 7.4.4 | Appendix IV – Sienna IM | page 337 | page 369 | page 397 | page 431 | page 438 |
| 7.4.5 | Appendix V – Imerys | page 443 | page 471 | page 527 | page 569 | - |
| **7.5** | **Statutory report** | **page 615** | | | | |

Table 02 – GBL's consolidated sustainability statement & ESRS requirements

## 7.1.6 Disclosures in relation to specific circumstances

No specific circumstances have been considered unless specified alongside the disclosures included in this consolidated sustainability statement. In general, GBL defines short-, medium- and long-term time horizons in accordance with ESRS 1, §77.

For GBL, "workforce" includes both employees and non-employees (the latter consisting mainly of advisors or experts in a dedicated field) while "own workforce" is restricted to employees only.

## 7.1.7 Value chain estimation, source of estimation and outcome uncertainty

Please refer to §7.2.2.7 GHG emissions, page 30 for GBL holding and the relevant disclosures in §7.4 Appendix, page 81 for the different consolidated entities.

## 7.1.8 Disclosure of other legislation or generally accepted sustainability reporting standards and frameworks based on which information has been included in the sustainability statement

To strengthen its sustainability statement while meeting ESRS provisions and specific reporting requirements, GBL has leveraged insights from the following guiding frameworks to support the interpretations and disclosures made in accordance with the ESRS standards:

(i) the United Nations Global Compact ("UNGC") framework, to which GBL formally committed in 2018;

(ii) the Sustainability Accounting Standards Board's ("SASB") – Asset Management & Custody Activities (FN-AC);

(iii) the Principal Adverse Impact ("PAI") disclosure provisions under the Sustainable Finance Disclosure Regulation (EU) 2019/2088 and in particular additional information related to PAI disclosures requirements 12 and 13 in accordance with Table I of Annex I of Commission Delegated Regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088;

(iv) the Principle for Responsible Investment ("PRI"), to which GBL has been a signatory since 2018 and has been reporting annually under the PRI framework on its ESG integration practices; and

(v) the CDP integrated questionnaire – Financial institution – Asset owner.

## 7.1.9 Use of phase-in provisions in accordance with Appendix C of ESRS 1

For purposes of its consolidated sustainability statement and in accordance with ESRS 1, Appendix C, GBL has applied the phase-in provisions related to ESRS 2 SBM-3 §48(e) phase-in provision on anticipated financial effects related to material IROs and their interaction with strategy and business model, and ESRS E1 E1-9 related to the anticipated financial effects from material physical and transitions risks and potential climate-related opportunities, whereby this consolidated sustainability statement does not include such information for this year's reporting.

Please refer to consolidated entities' disclosures (§7.4 Appendix, page 81) for specific disclosures on phase-in provisions applied in accordance with ESRS 1, Appendix C.

## 7.1.10 Forward looking statement

This consolidated sustainability statement may, in accordance with the requirements pursuant to the ESRS, contain statements that are, or may be deemed to be, "forward looking statements" that are prospective in nature. All statements other than statements of historical fact are forward looking statements. They are based on current expectations and projections about future events and are therefore subject to risks and uncertainties which could cause actual results to differ from the future results expressed or implied by the forward looking statements. Such forward looking statements are not guarantees of future performance and actual results may differ materially from those in the forward looking statements as a result of various factors. No assurance is given as to the likelihood of the achievement or reasonableness of any such statements and no commitment is taken to revise or update any such statements to reflect events or circumstances occurring or existing after the date of this consolidated sustainability statement.

# 7.2 PART I – GBL holding

## 7.2.1 General information

### 7.2.1.1 Governance structure and composition

The composition of GBL's Board of Directors reflects the controlling shareholding of the Company. GBL is controlled by Pargesa SA, a company governed by Swiss law, itself controlled by Parjointco SA, a company governed by Belgian law controlled jointly by the Frere and Power Corporation of Canada groups, under an agreement signed by the two groups in 1990. This agreement aims to establish and maintain equal control between the Power Corporation of Canada group and the Frere group in Pargesa SA, GBL and their respective designated subsidiaries. It was extended on December 16, 2012 and shall expire in 2029 if not renewed.

As at December 31, 2024, out of a total of eleven members, GBL's Board included six representatives proposed by the controlling shareholder, Pargesa SA. The shareholding structure dictates the composition of the Board of Directors. It deviates from Article 3.7 of the 2020 Belgian Code on Corporate Governance, which suggests a Board composition such that no individual Director or group of Directors is able to control decision-making. This control structure also justifies the presence, as at December 31, 2024, of representatives proposed by the controlling shareholder, Pargesa SA, on the Audit Committee (two members out of four) and Governance and Sustainable Development Committee (one member out of three).

It is also in this context that GBL has developed a diversity policy for its Board of Directors in accordance with the Law of September 3, 2017 on the disclosure of non-financial information and diversity information by certain companies and groups. Over the years, GBL has gradually increased the number of women on its Board and Committees, in accordance with the Law of July 28, 2011, which aims to guarantee the presence of women on the Board of Directors of listed companies. As at the date of this consolidated sustainability statement, out of a total of eleven members, GBL's Board of Directors welcomed four female Directors (36%).

As at December 31, 2024, GBL's Board of Directors had ten non-executive Directors (91%) and one executive Director (the Chief Executive Officer) out of a total of eleven members. The Company ensures the presence and contribution of Directors from different backgrounds and with diverse skills, as well as a sufficient number of independent Directors (four independent Directors (36%) out of the total of eleven members), thereby ensuring that the interests of all the Company's shareholders are respected. This set up is considered to provide GBL with a more agile governance that is better adapted to the its strategic challenges.

Employees and other members of GBL's workforce are as at the date of this consolidated sustainability statement not represented in GBL's Board of Directors.

GBL's executive management ("C-level") is composed of three senior officers: the Chief Executive Officer, the Chief Financial Officer, and the Corporate Secretary and Chief Operating Officer.

Please refer to the Corporate Governance chapter of the Annual Report (§2.2 Board of Directors and Committees, page 9).

### 7.2.1.2 Administrative, management and supervisory bodies and individuals responsible for oversight of IROs

GBL's Board of Directors oversees IRO-related strategic orientations, policies, projects, resources, performance, reporting and related processes.

In that process, GBL's Board of Directors devotes a significant part of its activity to the development of the group's strategic plans and, in particular, to the examination of investment and divestment projects. The Board of Directors also holds a yearly review with the CEO and the Head of ESG of the strategy, policies, actions and performance implemented to address material IROs covering both GBL as a "responsible company" and GBL as a "responsible investor". Additionally, the Board of Directors is informed at each meeting of the latest significant developments related to material IROs via a dedicated section in the CEO letter. Furthermore; and considering the ESG integration process implemented at GBL, each investment memo submitted to the Board of Directors by the CEO contains by default key material IROs findings and implications for the relevant investment case. The examination of the investment and divestment projects and the materiality assessment of the IROs is notably based on the list of the sustainability matters disclosed in the Application Requirement in Appendix A of the ESRS 1 and any other matters identified based on the specific circumstances of the group. For additional information, please refer to the stakeholder engagement process description hereafter.

The Governance and Sustainable Development Committee reviews and assesses IROs related to GBL acting in its capacity as a "responsible company" on an on-going. Conclusions from each Governance and Sustainable Development Committee meetings are reported to the Board of Directors by its Chairwoman.

In application of the ESG integration approach, the Audit Committee reviews and assesses on a yearly basis the risks inherent to GBL acting as a "responsible investor", including an IRO-specific risk assessment performed as part of the portfolio monitoring process (please refer to §7.3.1 Entity specific - ESG integration, page 47).

In accordance with the CSRD requirements as implemented into Belgian law, the tasks of the Audit Committee have been extended in 2024 to monitor sustainability reporting including: (i) informing the Board of Directors about the outcome of the assurance of sustainability reporting, and how the assurance contributed to the integrity of sustainability reporting, including what the role was of the Audit Committee in the process; (ii) monitoring the sustainability reporting process; (iii) monitoring the internal control and risk management systems with regards to sustainability reporting; (iv) monitoring the assurance of sustainability reporting and; (v) monitoring the independence of the independent assurance provider. The Audit Committee has been carrying out these tasks on an ongoing basis through 2024. Conclusions from each Audit Committee meeting are reported to the Board of Directors by its Chairwoman.

The CEO is responsible for the oversight of IRO strategy definition and implementation. He relies on the expertise of the Chief Financial Officer, the General Secretary and Chief Legal Officer and the Head of ESG.

GBL believes however that, in addition to setting the tone from the top, proper ESG integration requires widespread workforce engagement, as corporate culture is key to securing alignment with GBL's strategy. All corporate functions are therefore involved, primarily: (i) the investment team in charge of considering appropriate GBL's ESG integration approach as a "responsible investor" at each stage of the investment cycle; (ii) the Chief Financial Officer in charge of GBL's overall risk framework; (iii) the General Secretary and the legal and human resources departments in charge of social and governance matters; (iv) the Head of ESG in charge of environmental matters and; (v) the Head of Communication in charge of internal and external communication.

GBL's Board of Directors ensures that appropriate mechanisms for performance monitoring are in place through several key actions: (i) the Board of Directors is supported by its Committees (Audit Committee, Governance and Sustainable Development Committee) to oversee strategic decisions, financial and sustainability reporting, risk management and compliance, and performance; (ii) regular meetings are conducted to review strategic initiatives, investment activities, operational activities, financial and sustainability performance as well as internal controls; (iii) GBL refers to various performance metrics and key performance indicators ("KPIs") to monitor and assess performance across the different dimensions covered by material IROs as reflected in its remuneration policy (the "Remuneration Policy"); and (iv) GBL engages with stakeholders on a regular basis like for example General Meetings and other forums to align company performance with stakeholders' expectations.

Please refer to the Corporate Governance and the Risk management chapters of the Annual Report (§2.2 Board of Directors and Committees, page 9; §2.3 Remuneration policy, page 10; §3.1 Risk management and internal control, page 11).

## 7.2.1.3 Integration of sustainability-related performance in incentive schemes

GBL has put in place a sustainability-related incentive scheme for its Chief Executive Officer. Please refer to the Corporate Governance chapter of the Annual Report for more details (§2.3 Remuneration policy, page 10).

## 7.2.1.4 Statement on due diligence

GBL's due diligence process is supporting GBL's sustainability statement disclosures at each and every stage of the definition and implementation of its strategy towards sustainable IROs. Please refer to the table below for more details as well as to the related topical ESRS.

Please refer to the table below as well as to the related topical ESRS and disclosures in Appendix (please refer to §7.4 Appendix, page 81).

| Disclosure | | Pages |
|---|---|---|
| *Contribution from due diligence to governance, strategy and business model* | | |
| ESRS 2 GOV-2 | Information provided to GBL's Board of Directors | page 9, page 48 |
| ESRS 2 GOV-3 | Integration of sustainability-related performance in incentive schemes | page 40 |
| ESRS 2 SBM-3 | Material IROs and their interaction with strategy and business model | page 14, page 48 |
| *Contribution of stakeholders' engagement* | | |
| ESRS 2 GOV-2 | Information provided to GBL's Board of Directors | page 12 |
| ESRS 2 SBM-2 | Interests and views of stakeholders | page 12 |
| ESRS 2 IRO-1 | Description of the process to identify and assess material IROs | page 12, page 48 |
| ESRS 2 MDR-P | Policies adopted to manage material sustainability matters | page 14 |
| *Contribution to identification and assessment of adverse impacts* | | |
| ESRS 2 IRO-1 | Description of the process to identify and assess material IROs | page 12, page 48 |
| ESRS 2 SBM-3 | Material IROs and their interaction with strategy and business model | page 14, page 48 |
| *Support to the definitions of the range of actions (including transition plan)* | | |
| ESRS 2 MDR-A | Actions and resources in relation to material sustainability matters | page 9 |
| ESRS 2 MDR-M | Metrics in relation to material sustainability matters | page 9 |
| ESRS 2 MDR-T | Tracking effectiveness of policies and actions through targets | page 9 |

Table 03 – GBL statement on due diligence

## 7.2.1.5 Risk management and internal controls over sustainability reporting

For information on the internal control process over the sustainability reporting process, please refer to Risk management chapter of the Annual Report (§3.2.3 Risks specific to GBL, page 64 and §3.2.4 Control activities implemented by GBL, page 65).

## 7.2.1.6 Strategy and sustainability matters

GBL is an established investment holding company, with over seventy years of stock exchange listing. As a leading European investor, focusing on long-term and sustainable value creation and relying on a stable and supportive family shareholder base, GBL strives to maintain a diversified high-quality portfolio composed of global companies, leaders in their sector, in which it can contribute to value creation by being an engaged professional investor.

As an investment holding company, GBL has adopted a dual approach in structuring its sustainability strategy deriving directly from its twofold responsibility and approach to investments:

- GBL as *Responsible Company* (also referred to as "Responsible Corporate"), consisting of the parent company GBL and its direct and indirect subsidiaries having, as their main activity, the management of investments. In this respect, GBL has potential sustainability impacts, risks and opportunities linked to its role as an employer and contributor to the communities in which it operates;
- GBL as *Responsible Investor*, which encompasses the companies within GBL's portfolio (whether controlled or not, including GBL Capital's portfolio). Those companies identify and address their sustainability impacts and associated risks and opportunities within the framework of their own internal controls and governance. Paramount in the sustainability strategy and business model of GBL in this context is the ESG integration approach implemented through the investment cycle (pre-/post investment phase), independently of the characteristics of the assets (whether controlled or not).

GBL's core processes therefore relate to: (i) investment pre-investment phase (origination, due diligence) and post-investment phase (value creation and monitoring, divestment); and (ii) supporting operations.

Intrinsic to the nature of its investment holding activity, GBL has a rather limited exposure to upstream value chain, mainly via the business relationships it maintains with a potential large pool of financial service providers (e.g. auditors, financial advisors and consultants, lawyers), its landlords (offices) and its suppliers of mobility services (e.g. mobility devices provided by GBL to its own workforce). In accordance with GBL's Code of Conduct and Ethics (the "Code") and GBL's Code of Conduct for Suppliers (the "Supplier Code"), GBL maintains standard, market-practice contractual and commercial relationships with these suppliers to conduct its operations. In accordance with the applicable terms of services, such business relationships cannot be advertised.

In accordance with ESRS 1 §63, EFRAG IG 2 §26, §66 and §67, GBL's non-controlled portfolio participations (being listed or private portfolio companies, including GBL Capital's portfolio) form part of GBL's business relationships which are deemed to form part of GBL's value chain as investments. GBL's portfolio of participations is detailed in the Portfolio review chapter of the Annual Report (Chapter 4, Portfolio review, page 69).

As an investment holding company deploying permanent capital, GBL has no customers.

## 7.2.1.7 Stakeholder engagement

The purpose of GBL's stakeholder engagement process is to enable GBL to identify key stakeholders' potential interests and concerns based on an ongoing interaction and dialogue between GBL and its key identified stakeholders. It supports the identification and definition of sustainability topics and related IROs to which GBL will apply criteria for assessing potential impact and financial materiality, and supports the formulation of strategies, policies, action plans, and targets to mitigate material impacts and risks. It ensures that GBL shares on a regular basis these developments and achievements with the key identified shareholders. In 2024, GBL conducted its DMA process for the first time in accordance with ESRS 1 section 3 and EFRAG IG 1 requirements.

In accordance with ESRS 1 section 3.1, the stakeholders identified by GBL are spread over the following categories:

(i) Affected stakeholders: it covers the individuals or groups whose interests are affected or could be affected – positively or negatively – by GBL's activities and its direct and indirect business relationships across its value chain as well as "nature" as a silent stakeholder. Under this category, GBL identified the controlled portfolio companies and GBL's workforce;

(ii) Users of sustainability statements: it covers the primary users of general-purpose financial reporting and other users of sustainability statements, including the undertaking's business partners, social partners, civil society and non-governmental organizations, governments, analysts and academics. Under this category, GBL identified the financial institutions GBL is working with;

(iii) As highlighted in ESRS 1 section 3.1, some stakeholders can belong to these two categories. It is typically the case for shareholders and their elected representatives like GBL's Board of Directors and the representatives of the controlling families as well as the external support such as notably auditors, lawyers or consultancy firms. It also covers the landlords and facilities sub-contractors.

In accordance with ESRS 1 section 3.1 and taking into account that further to ESRS 1 §24 and §45 and EFRAG IG 1 FAQ 5.4 impact materiality is informed by the due diligence process, the following categories of stakeholders are considered as key stakeholders for GBL:

(i) Board of Directors: Controlling families, Audit Committee;

(ii) Senior management: General Counsel, Chief Financial Officer;

(iii) Management and workforce: Head of ESG, Head of Human Resources ("Head of HR"), Group Controller, Employee representative;

(iv) Banking relationship: Senior banker, Head of sustainable finance advisory services;

(v) Portfolio's participations: senior management representatives from listed and private assets;

(vi) Peers: conventional investment holding company peer group (composition as disclosed in §1.2.5 Sector Peers, page 23), largest Belgium peers (local) and relevant French peers;

(vii) Equintel AI (Artificial Intelligence) tool: AI-NLP (Natural Language Processing) identification and tracking of GBL's ESG share-of-voice.

Considering the nature of the contractual and commercial relationships between GBL and the stakeholders referenced in financial services and landlords & facilities contractors above (cf. ESRS 2, SBM-1 §42 and ESRS 1, Appendix A, AR 14), GBL considers that sustainability topics and related IROs for these groups are not relevant for its own stakeholder engagement strategy and they have therefore not been retained in the list of key stakeholders.

"Nature" as a silent stakeholder has also been considered by GBL in its mapping of the value chain and the mapping of the stakeholders. Considering the characteristics of GBL's operations, mainly being an office activity, "nature" has been considered as non-relevant for GBL and has therefore not been retained in the list of key stakeholders.

In accordance with ESRS 1 §24 and §45 and EFRAG IG 1 FAQ 5.4 and for the production of the DMA and the material IROs' identification and validation, GBL's key stakeholders have been involved in a structured way across the four main stages of the engagement process conducting to the validation of the list of material IROs:

(i) Understanding of sustainability landscape: Senior Management (General Counsel), Head of ESG, Head of HR, Peers, Equintel AI tool;

(ii) IROs identification: Board of Directors (Controlling families), Senior Management (General Counsel, Chief Financial Officer), Head of ESG, Head of HR, Group Controller, Employee representative, Banking relationship, Participations (listed and private assets), peers, Equintel AI tool;

(iii) Impact assessment validation: Board of Directors (Audit Committee), Senior Management (General Counsel, Chief Financial Officer), Head of ESG, Head of HR;

(iv) Financial materiality validation: Board of Directors (Audit Committee), Senior Management (General Counsel, Chief Financial Officer), Head of ESG, Group Controller.

In 2024, GBL's stakeholder engagement was conducted via direct interviews with the representatives from the different categories of stakeholders mentioned above. The interviews conducted with the internal and external stakeholders are based on scripts addressing a set of questions based on the profile and expertise of the stakeholders and their outcome is documented via the drafting of minutes.

GBL's Board of Directors and Audit Committee are informed about the views and interests of affected stakeholders with regards to sustainability-related impacts on a yearly basis. The outcome of GBL's stakeholder engagement supports the identification, definition and validation of material IROs retained by GBL as part of the DMA exercise. The key stakeholders involved in GBL's engagement process in 2024 are directly involved in the formulation and execution of GBL's strategy as well as the implementation of GBL's business model.

## 7.2.1.8 Processes to identify and assess material impacts, risks and opportunities

For GBL in its capacity as a "responsible company", the DMA methodology is based on four main steps, being (i) the identification of the sustainability landscape; (ii) the identification of an initial list of IROs supported by stakeholder engagement; (iii) the assessment of impact and financial materiality, and (iv) the mapping of the list of ESG topics and material IROs.

### 7.2.1.8.1 Identification of sustainability landscape

The initial step of the DMA focuses on outlining the sustainability landscape specific to GBL and its primary operations, as well as identifying key stakeholders impacted and their respective contributions.

This step supports the investigation of potential material ESG topics to assess in a next phase the potential IROs. Aligned with the statement provided under the Basis for Preparation and the description of the Scope (please refer to § 7.1 Basis for preparation statement, page 4), a preliminary step consists of proceeding with a thorough analysis of the activities of the group, its business relationships, and the context of GBL's operations.

During this step, the following tasks are performed: (i) the analysis of GBL's strategy, financial statements and ESG reporting covering the previous periods; (ii) a review of the economic activities and their geographic locations; (iii) a mapping of the business relationships in upstream and/or downstream value chain, including type and nature of business relationships; (iv) an understanding of the affected stakeholders and their potential interests; (v) the consultation of published information from peers; and (vi) the analysis of GBL's relevant legal and regulatory landscape.

### 7.2.1.8.2 Identification of an initial list of IROs supported by stakeholder engagement

Stakeholder engagement supports the identification and definition of the list of the sustainability topics and related IROs to which GBL will apply criteria for assessing potential impact and financial materiality and determining the material information to be disclosed. Leveraging on the stakeholder mapping performed by GBL, a dialogue is initiated via interviews with a selection of different internal and external stakeholders in order to identify and evaluate potential material ESG topics and matters related to GBL's corporate activities.

To ensure the stakeholders' views and interest are gathered throughout the various stages of the DMA, some stakeholders may be involved multiple times at different stages of the process, i.e. (i) identification and validation of potential ESG topics and related IROs; (ii) validation of the assessment and scoring performed during the impact materiality phase; and/or (iii) validation of the assessment and scoring performed during the financial materiality phase.

Considering GBL's operations and value chain and subject to completeness and cohesiveness, the development of the long list of ESG topics and related IROs is supported by an in-depth review and analysis of different sources of information: (i) the list of the sustainability matters covered in topical ESRS in accordance with ESRS 1 AR16 is used as starting point; (ii) ESG topics and related IROs identified through the utilization of Equintel AI DMA solution are added to the initial list; (iii) a cross check of potential ESG matters is performed through a peers benchmarking review. Sustainability topics and IROs identified using Equintel AI DMA solution are used as starting point for the peers benchmarking. Public disclosures available through annual reports, sustainability reports, ESG institutional communication, corporate websites, industry-specific communication, etc. are supporting the peer benchmark review; and (iv) finally, the list is completed by entity specific topics relevant to GBL as a "responsible company".

### 7.2.1.8.3 Impact materiality assessment

The long list of ESG topics and related IROs is reviewed in order to establish an intermediate list of the ESG topics and IROs that will be used for the impact and financial materiality assessment: (i) each element of the long list is subject to a thorough analysis from a relevance perspective taking into account the business considerations and the related views and interests of the stakeholders involved; (ii) from a faithful representation and understandability requirement perspective, particular attention is given to the definition of each ESG topic and IRO; (iii) stakeholder engagement strategy supports the validation of the intermediate list with a focus on understanding how GBL may impact and/or may be impacted by a specific ESG topic and related IROs or in assessing the time horizon and the likelihood of sustainability impacts; and (iv) three categories of stakeholders are involved to identify, assess, validate and ensure the completeness of the intermediate list and the materiality assessment (a representative of the controlling families; a representative of GBL's senior management; and a representative of GBL's own workforce).

In line with ESRS 1, Appendix A, AR10 and AR 11, and EFRAG IG 1 §3.6, all potential material ESG topics and related IROs identified in the intermediate list are scored taking into account in particular the scale (1 'minimal' to 5 'maximal'), scope (1 'limited' to 5 'global'), level of irremediability (0 'very easy to remedy' to 5 'irreversible') and likelihood (1 'very low' to 4 'very high') of the impact. GBL retained *"Equal to or above 8"* as the impact materiality threshold.

The assessment of material impacts based on the criteria detailed above is carried out for each sustainability matter identified on the intermediate list: (i) a scoring is attributed to each criteria, whereby any criteria can lead to a matter being considered as material: scale, impact, irremediability (for the negative impacts) and likelihood (for the potential impacts); (ii) a calculation is made in application of the appropriate calculation method subject to a) the positive and negative impact combined with b) the potential and actual characteristic of this impact; and (iii) each impact with a score equal to or above eight is considered as material.

The definition of the thresholds as well as the scoring calculation of each sustainability matter retained on the intermediate list was performed initially by GBL's Head of ESG. The impact materiality threshold has been initially defined by GBL's Head of ESG leveraging on the input from the Equintel AI DMA tool. The thresholds have been validated by different stakeholders during the workshop sessions, in particular GBL's Chief Financial Officer and GBL's General Counsel and General Secretary.

Furthermore, the short list was subject to discussion with stakeholders identified by GBL's Head of ESG, which includes among others GBL's Board of Directors representing the controlling families, GBL's Head of HR and GBL's banking relationships. The impact materiality assessment has been completed with the validation of the list of the material impacts by different stakeholders and GBL's senior management (Chief Financial Officer and General Counsel and General Secretary).

### 7.2.1.8.4 Financial materiality

As for the financial materiality, the purpose of scanning ESG risks and opportunities is to establish an intermediate list of ESG topics resulting from the risk and opportunity analysis performed in accordance with the steps described below: (i) each element is subject to a thorough analysis from a relevance perspective taking into account business considerations and views and perspectives expressed by the different stakeholders involved in the process; particular attention is paid to the definition of each risk or opportunity from a faithful representation and understandability requirement perspective; (ii) stakeholder engagement supports the assessment, validation and completeness of the list of material risks and opportunities, and the evaluation of financial effects and likelihood of the topics in line with ESRS criteria; (iii) the comparison is made between the list of actual and potential IROs prepared as part of the impact materiality assessment process described above and the list used in GBL's risk management process related to sustainability matters (Enterprise Risk Management). The purpose of this mapping is to estimate the likelihood of risks and opportunities and their related financial effects to ensure the completeness of the list; (iv) impact materiality and financial materiality assessment being interrelated, interdependencies between the two dimensions are also considered through the identification of the financial effects of the impacts previously identified; and (v) the analysis of dependencies and the identification of specific business relationships that contributes to consider additional risks or opportunities is carried out to complete the intermediate list. GBL's potential dependency on natural, human and/or social resources is assessed based on its business processes and potential specific business relationships. ESG topics identified under the intermediate list are then classified between risks and opportunities categories.

In line with ESRS 1, Appendix A, AR15, and EFRAG IG 1 §3.7, all potential risks and opportunities identified in the intermediate list are scored taking into account in particular the potential magnitude of the financial effect (1 'very low' to 4 'very high') and likelihood of occurrence (1 'very low' to 4 'very high') under short-, medium- or long-term time horizons. "*Equal to or above 0.5*" is retained by GBL for GBL "as a responsible company" as the financial materiality threshold. The financial materiality assessment based on the criteria detailed above is carried out for each sustainability matter identified on the intermediate list: (i) a scoring is attributed to each criteria (magnitude and likelihood); (ii) a calculation is made in application of the appropriate calculation method subject to the risk or opportunity qualification; and (iii) each risk and opportunity with a score "*Equal to or above 0.5*" is considered as financially material.

The definition of the thresholds as well as the scoring calculation of each sustainability matter retained in the intermediate list has been performed initially by GBL's Head of ESG. The thresholds were validated by different stakeholders during the workshop sessions, in particular GBL's Chief Financial Officer and GBL's Group Risk Controller.

Furthermore, the short list was subject to discussion with stakeholders identified as part of the engagement process, among others GBL's senior management, representatives from portfolio companies and the investment team. The financial materiality assessment has been completed with the validation of the list of the material risks and opportunities by different stakeholders and GBL's senior management.

## 7.2.1.9 Material ESG topics and related IROs

Based on the lists of ESG topics and related IROs, a consolidated list of material ESG topics and related IROs for GBL as a "responsible company" has been produced. This list forms the basis for the preparation of the consolidated sustainability statement and supports the production of the DMA matrix. The list of material ESG topics, related IROs as well as the DMA matrix has been validated by GBL's senior management, GBL's Audit Committee and GBL's Board of Directors. This list will be revised on an annual basis.

Through the DMA process, GBL identified the following impacts as material:

(i) *Climate change - Climate change mitigation*: "Climate change mitigation" sub-topic is an actual negative material impact over a long-term time horizon. It relates to the group's emissions and their impact on climate change, and encompasses GBL's endeavors to contribute to the general process of limiting the increase in the global average temperature to 1.5°C above pre-industrial levels in line with the Paris Agreement, GBL's own operations GHG emissions as defined by the GHG Protocol and the associated transition risks;

(ii) *Own workforce – Equal treatment and opportunities for all – Training and skills development*: "Training and skills development" sub-sub-topic is a positive actual material impact over a medium term for GBL's own operations. It relates to individualized coaching, mentoring and educational programs such as leadership courses and bespoke training sessions. Such programs positively support GBL's own workforce overall expertise, skills, knowledge and productivity and improve satisfaction and employee retention;

(iii) *Business conduct – Corporate culture*: "Corporate culture" sub-topic is a positive actual material impact over a long-term time horizon. Corporate culture expresses goals through shared values and beliefs. It guides GBL's activities and own operations through shared assumptions and norms such as values or mission statements. It brings positive impact as it is heightening GBL's brand identity, it is supporting GBL's ability to attract higher-caliber candidates, it is fostering a healthy work environment and it is increasing satisfaction and productivity;

(iv) *Entity specific – Philanthropy*: "Philanthropy" entity-specific sub-sub-topic is a positive actual material impact over a medium-term horizon. Carried out under the GBL ACT initiative and related to GBL's own operations, GBL's philanthropic activities are conducted under a truly philanthropic philosophy and approach aiming for a local positive impact across well-defined areas of intervention like education, healthcare, environmental protection or social justice. Beyond the positive local contribution to the environment and the society, GBL ACT supports own workforce motivation and retention;

(v) *Entity specific – ESG integration*: "ESG integration" entity-specific sub-sub-topic is a positive actual material impact over a medium-term horizon. Defined by the PRI as "the explicit and systematic inclusion of ESG issues in investment analysis and investment decision", ESG integration generates positive impact on GBL's portfolio participations sustainability journeys and achievements via a systematic engagement on material IROs at Board level and with the relevant senior management representatives of portfolio's participations.

Through the DMA process, GBL identified the following risks and opportunities as material:

(i) *Own workforce – Working conditions – Adequate wage*: "Adequate wage" sub-sub-topic is a risk over a medium-term time horizon. For its own operations, GBL's ability to access the right pool of talents in the financial industry in Continental Europe may require providing own workforce with market-competitive remuneration packages to ensure talent attraction and retention. The inability of GBL to provide such market-competitive remuneration packages may impede its ability to properly execute its strategy. GBL's Remuneration Policy is addressing this risk;

(ii) *Business conduct – Corporate culture*: "Corporate culture" sub-topic is a risk over a long-term time horizon. Corporate culture expresses goals through shared values and beliefs. It guides the undertaking's activities and the conduct of its own operations through shared assumptions and norms such as values or mission statements and the Code. The inability of GBL to ensure a strict adherence to GBL's values and the different codes, policies and processes driving GBL's investments and day-to-day activities may impact GBL's reputation and reliability. GBL's values and the Code address this risk;

(iii) *Business conduct – Corruption and bribery - Incidents*: "Incidents" sub-sub-topic is a risk over a short-term time horizon. Business ethics incidents cover for GBL any incident related to fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice or other financial industry laws or regulations happening in its own operations. The inability of GBL to ensure strict compliance with financial industry laws or regulations may affect GBL's reputation. GBL's Code addresses this risk;

(iv) *Entity specific – ESG integration*: "ESG integration" sub-sub-topic is a risk over a long-term time horizon. Defined by the PRI as "the explicit and systematic inclusion of ESG issues in investment analysis and investment decision", the inability of GBL to enforce a proper integration of ESG factors in pre-investment cycle (exclusion policy, ESG proprietary rating, ESG due diligence) and post investment cycle (ESG strategic plan, ESG engagement, ESG risk monitoring, stewardship, exit) may affect GBL's reputation and the performance of its investment activities. GBL's ESG Policy (the "ESG Policy") addresses this risk.

Under GBL's accounting policy, GBL financial statements are deemed to reflect the current effects of material risks and opportunities identified previously. As indicated above, it should be noted for completeness that, for purposes of its consolidated sustainability statement and in accordance with ESRS 1, Appendix C, GBL has applied the phase-in provisions related to ESRS E1 E1-9 related to the anticipated financial effects from material physical and transitions risks and potential climate-related opportunities.

GBL aims to ensure the resilience of its strategy and business model by ensuring the identification and mitigation of material IROs on an ongoing basis under the process described above (please refer to §7.2.1.8 Process to identify and assess material impacts, risks and opportunities, page 12).

## 7.2.1.10 List of data points derived from other EU legislations

Table 04 below summarizes the list of data points derived from other EU legislations.

| Disclosure requirement | Data point | Sustainability statement topic | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS 2 GOV-1 | 21 (d) | Board's gender diversity | Indicator number 13 of Table #1 of Annex 1 | | Commission Delegated Regulation (EU) 2020/1816 ( 27 ) , Annex II | | page 9 |
| ESRS 2 GOV-1 | 21 (e) | Percentage of board members who are independent | | | Delegated Regulation (EU) 2020/1816, Annex II | | page 9 |
| ESRS 2 GOV-4 | 30 | Statement on due diligence | Indicator number 10 Table #3 of Annex 1 | | | | page 10 |
| ESRS 2 SBM-1 | 40 (d) i | Involvement in activities related to fossil fuel activities | Indicators number 4 Table #1 of Annex 1 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 ( 28 ) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk | Delegated Regulation (EU) 2020/1816, Annex II | | page 65 |
| ESRS 2 SBM-1 | 40 (d) ii | Involvement in activities related to chemical production | Indicator number 9 Table #2 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |
| ESRS 2 SBM-1 | 40 (d) iii | Involvement in activities related to controversial weapons | Indicator number 14 Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1818 ( 29 ) , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |
| ESRS 2 SBM-1 | 40 (d) iv | Involvement in activities related to cultivation and production of tobacco | | | Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |
| ESRS E1-1 | 14 | Transition plan to reach climate neutrality by 2050 | | | | Regulation (EU) 2021/1119, Article 2(1) | page 24 |

| Disclosure requirement | Data point | Sustainability statement topic | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS E1-1 | 16 (g) | Undertakings excluded from Paris-aligned Benchmarks | | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2 | | page 24 |
| ESRS E1-4 | 34 | GHG emission reduction targets | Indicator number 4 Table #2 of Annex 1 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 6 | | page 28 |
| ESRS E1-5 | 38 | Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) | Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1 | | | | Not relevant |
| ESRS E1-5 | 37 | Energy consumption and mix | Indicator number 5 Table #1 of Annex 1 | | | | page 29 |
| ESRS E1-5 | 40-43 | Energy intensity associated with activities in high climate impact sectors | Indicator number 6 Table #1 of Annex 1 | | | | Not relevant |
| ESRS E1-6 | 44 | Gross Scope 1, 2, 3 and Total GHG emissions | Indicators number 1 and 2 Table #1 of Annex 1 | Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1 | | page 30 |
| ESRS E1-6 | 53-55 | Gross GHG emissions intensity | Indicators number 3 Table #1 of Annex 1 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 8(1) | | page 30 |
| ESRS E1-7 | 56 | GHG removals and carbon credits | | | | Regulation (EU) 2021/1119, Article 2(1) | page 32 |
| ESRS E1-9 | 66 | Exposure of the benchmark portfolio to climate-related physical risk | | | Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II | | page 26 |

| Disclosure requirement | Data point | Sustainability statement topic | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS E1-9 | 66 (a); 66 (c) | Disaggregation of monetary amounts by acute and chronic physical risk; Location of significant assets at material physical risk | | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk. | | | page 26 |
| ESRS E1-9 | 67 (c) | Breakdown of the carrying value of its real estate assets by energy-efficiency classes | | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral | | | Not material |
| ESRS E1-9 | 69 | Degree of exposure of the portfolio to climate-related opportunities | | | Delegated Regulation (EU) 2020/1818, Annex II | | page 80 |
| ESRS E2-4 | 28 | Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil | Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1 | | | | Not material |
| ESRS E3-1 | 9 | Water and marine resources | Indicator number 7 Table #2 of Annex 1 | | | | Not material |
| ESRS E3-1 | 13 | Dedicated policy | Indicator number 8 Table 2 of Annex 1 | | | | Not material |
| ESRS E3-4 | 14 | Sustainable oceans and seas | Indicator number 12 Table #2 of Annex 1 | | | | Not material |
| ESRS E3-4 | 28 c | Total water recycled and reused | Indicator number 6.2 Table #2 of Annex 1 | | | | Not material |
| ESRS E3-4 | 29 | Total water consumption in m³ per net revenue on own operations | Indicator number 6.1 Table #2 of Annex 1 | | | | Not material |
| ESRS 2 - IRO 1 -E4 | 16 (a) | | Indicator number 7 Table #1 of Annex 1 | | | | Not material |
| ESRS 2 - IRO 1 -E4 | 16 (b) | | Indicator number 10 Table #2 of Annex 1 | | | | Not material |
| ESRS 2 - IRO 1 -E4 | 16 (c) | | Indicator number 14 Table #2 of Annex 1 | | | | Not material |
| ESRS E4-2 | 24 (b) | Sustainable land / agriculture practices or policies | Indicator number 11 Table #2 of Annex 1 | | | | Not material |
| ESRS E4-2 | 24 (c) | Sustainable oceans / seas practices or policies | Indicator number 12 Table #2 of Annex 1 | | | | Not material |
| ESRS E4-2 | 24 (d) | Policies to address deforestation | Indicator number 15 Table #2 of Annex 1 | | | | Not material |
| ESRS E5-5 | 37 (d) | Non-recycled waste | Indicator number 13 Table #2 of Annex 1 | | | | Not material |

| Disclosure requirement | Data point | Sustainability statement topic | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS E5-5 | 39 | Hazardous waste and radioactive waste | Indicator number 9 Table #1 of Annex I | | | | Not material |
| ESRS 2- SBM3 - S1 | 14 (f) | Risk of incidents of forced labour | Indicator number 13 Table #3 of Annex I | | | | page 35 |
| ESRS 2- SBM3 - S1 | 14 (g) | Risk of incidents of child labour | Indicator number 12 Table #3 of Annex I | | | | page 35 |
| ESRS S1-1 | 20 | Human rights policy commitments | Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I | | | | page 35 |
| ESRS S1-1 | 21 | due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | | | Delegated Regulation (EU) 2020/1816, Annex II | | page 35 |
| ESRS S1-1 | 22 | Processes and measures for preventing trafficking in human beings | Indicator number 11 Table #3 of Annex I | | | | page 36 |
| ESRS S1-1 | 23 | Workplace accident prevention policy or management system | Indicator number 1 Table #3 of Annex I | | | | page 35 |
| ESRS S1-3 | 32 (c) | Grievance/complaints handling mechanisms | Indicator number 5 Table #3 of Annex I | | | | page 37 |
| ESRS S1-14 | 88 (b) and (c) | Number of fatalities and number and rate of work-related accidents | Indicator number 2 Table #3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | page 42 |
| ESRS S1-14 | 88 (e) | Number of days lost to injuries, accidents, fatalities or illness | Indicator number 3 Table #3 of Annex I | | | | page 42 |
| ESRS S1-16 | 97 (a) | Unadjusted gender [redacted] | Indicator number 12 Table #1 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | page 43 |
| [redacted] | [redacted] | [redacted] | Indicator number 8 Table #3 of Annex I | | | | page 43 |
| [redacted] | [redacted] | [redacted] | Indicator number 7 Table #3 of Annex I | | | | page 43 |
| [redacted] | [redacted] | [redacted] | Indicator number 10 Table #1 and Indicator number 14 Table #3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1) | | page 43 |
| [redacted] | [redacted] | [redacted] labour in the value chain | Indicators number 12 and number 13 Table #3 of Annex I | | | | Not material |
| ESRS S2-1 | 17 | Human rights policy commitments | Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I | | | | Not material |
| ESRS S2-1 | 18 | Policies related to value chain workers | Indicator number 11 and number 4 Table #3 of Annex I | | | | Not material |
| ESRS S2-1 | 19 | Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines | Indicator number 10 Table #1 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | Not material |

| Disclosure requirement | Data point | Sustainability statement topic | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS S2-1 | 19 | Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | | | Delegated Regulation (EU) 2020/1816, Annex II | | Not material |
| ESRS S2-4 | 36 | Human rights issues and incidents connected to its upstream and downstream value chain | Indicator number 14 Table #3 of Annex 1 | | | | Not material |
| ESRS S3-1 | 16 | Human rights policy commitments | Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1 | | | | Not material |
| ESRS S3-1 | 17 | Non-respect of UNGPs on Business and Human Rights, and OECD guidelines | Indicator number 10 Table #1 Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | Not material |
| ESRS S3-4 | 36 | Human rights issues and incidents | Indicator number 14 Table #3 of Annex 1 | | | | Not material |
| ESRS S4-1 | 16 | Policies related to consumers and end-users | Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1 | | | | Not material |
| ESRS S4-1 | 17 | Non-respect of UNGPs on Business and Human Rights and OECD guidelines | Indicator number 10 Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | Not material |
| ESRS S4-1 | 35 | Human rights issues and incidents | Indicator number 14 Table #3 of Annex 1 | | | | Not material |
| ESRS G1-1 | 10 (b) | United Nations Convention against Corruption | Indicator number 15 Table #3 of Annex 1 | | | | page 44 |
| ESRS G1-1 | 10 (d) | Protection of whistle-blowers | Indicator number 6 Table #3 of Annex 1 | | | | page 37 |
| ESRS G1-4 | 24 (a) | Fines for violation of anti-corruption and anti-bribery laws | Indicator number 17 Table #3 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II) | | page 45 |
| ESRS G1-4 | 24 (b) | Standards of anti-corruption and anti-bribery | Indicator number 16 Table #3 of Annex 1 | | | | page 44 |

Table 04 – List of data points derived from other EU legislations

## 7.2.1.11 Disclosure of list of ESRS Disclosure Requirements complied with in preparing sustainability statement following outcome of materiality assessment

The material information to be disclosed in relation to material IROs has been determined under the DMA process described above. Following the outcome of the DMA process, GBL has been complying with the list of ESRS disclosure requirements summarised in the tables below.

| Disclosure | ESRS E1 - Climate change | Page |
|---|---|---|
| *Governance* | | |
| ESRS 2, GOV-3 | Integration of sustainability-related performance in incentive schemes | page 40 |
| *Strategy* | | |
| E1-1 | Transition plan for climate change mitigation | page 24 |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | page 26 |
| *IRO* | | |
| ESRS 2, IRO-1 | Description of the processes to identify and assess material climate-related impacts, risks and opportunities | page 26 |
| E1-2 | Policies related to climate change mitigation and adaptation | page 27 |
| E1-3 | Actions and resources in relation to climate change policies | page 28 |
| *Metrics and targets* | | |
| E1-4 | Targets related to climate change mitigation and adaptation | page 28 |
| E1-5 | Energy consumption and mix | page 29 |
| E1-6 | Gross Scopes 1, 2, 3 and Total GHG emissions | page 30 |
| E1-7 | GHG removals and GHG mitigation projects financed through carbon credits | page 32 |
| E1-8 | Internal carbon pricing | page 33 |
| E1-9 | Anticipated financial effects from material physical and transition risks and potential climate-related opportunities | page 26 |

Table 05 – ESRS disclosure requirements – ESRS E1

| Disclosure | ESRS S1 - Own Workforce | Page |
|---|---|---|
| *Strategy* | | |
| ESRS S1, SBM-2 | Interests and views of stakeholders | page 34 |
| ESRS S1, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business mode | page 34 |
| *IRO* | | |
| S1-1 | Policies related to own workforce | page 35 |
| S1-2 | Processes for engaging with own workers and workers' representatives about impacts | page 36 |
| S1-3 | Processes to remediate negative impacts and channels for own workers to raise concerns | page 37 |
| 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 action | page 37 |
| *Metrics and targets* | | |
| S1-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | page 38 |
| S1-6 | Characteristics of the undertaking's employee | page 39 |
| S1-7 | Characteristics of non-employee workers in the undertaking's own workforce | page 39 |
| S1-8 | Collective bargaining coverage and social dialogue | page 40 |
| S1-9 | Diversity metrics | page 40 |
| S1-10 | Adequate wages | page 41 |
| S1-11 | Social protection | page 41 |
| S1-13 | Training and skills development metrics | page 41 |
| S1-14 | Health and safety metrics | page 42 |
| S1-15 | Work-life balance metrics | page 42 |
| S1-16 | Compensation metrics (pay gap and total compensation) | page 42 |

| Disclosure | ESRS S1 - Own Workforce | Page |
|---|---|---|
| S1-17 | Incidents, complaints and severe human rights impacts | page 43 |

Table 06 – ESRS disclosure requirements – ESRS S1

| Disclosure | ESRS G1 - Business conduct | Page |
|---|---|---|
| *Governance* | | |
| ESRS 2, GOV-1 | The role of the administrative, supervisory and management bodies | page 44 |
| *IRO* | | |
| ESRS 2, IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities | page 44 |
| G1-1 | Business conduct policies and corporate culture | page 44 |
| G1-2 | Management of relationships with suppliers | page 11 |
| G1-3 | Prevention and detection of corruption and bribery | page 44 |
| *Metrics and targets* | | |
| G1-4 | Incidents of corruption or bribery | page 45 |
| G1-5 | Political influence and lobbying activities | page 44 |
| G1-6 | Payment practices | page 44 |

Table 07 – ESRS disclosure requirements – ESRS G1

## 7.2.1.12 Disclosure of list of ESRS Disclosure Requirements incorporated by reference

The following list of ESRS disclosure requirements have been incorporated by reference.

| Disclosure | ESRS 2 - General disclosures – Incorporation by reference | Page |
|---|---|---|
| *Basis for preparation* | | |
| BP-1 | General basis for preparation of the sustainability statement | - |
| BP-2 | Disclosures in relation to specific circumstance | - |
| BP-2 | Datapoints that derives from other legislations | - |
| *Governance* | | |
| GOV-1 | The role of the administrative, management and supervisory bodies | page 27 |
| GOV-2 | Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies | - |
| GOV-3 | Integration of sustainability-related performance in incentive schemes | page 40 |
| GOV-4 | Statement on sustainability due diligence | - |
| GOV-5 | Risk management and internal controls over sustainability reporting | page 64<br>page 65 |
| *Strategy* | | |
| SBM-1 | Strategy, business model and value chain | page 65 |
| SBM-2 | Interests and views of stakeholders | page 70 |
| SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | - |
| *IRO* | | |
| IRO-1 | Description of the process to identify and assess material impacts, risks and opportunities | - |
| IRO-2 | Disclosure requirements in ESRS covered by the undertaking's sustainability statement | - |

Table 08 – ESRS disclosure requirements – ESRS 2 – Incorporation by reference

| Disclosure | ESRS E1 - Climate change – Incorporation by reference | Page |
|---|---|---|
| *Governance* | | |
| ESRS 2, GOV-3 | Integration of sustainability-related performance in incentive schemes | page 27 |
| *Strategy* | | |
| E1-1 | Transition plan for climate change mitigation | - |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | - |
| *IRO* | | |
| ESRS 2, IRO-1 | Description of the processes to identify and assess material climate-related impacts, risks and opportunities | - |
| E1-2 | Policies related to climate change mitigation and adaptation | - |
| E1-3 | Actions and resources in relation to climate change policies | - |
| *Metrics and targets* | | |
| E1-4 | Targets related to climate change mitigation and adaptation | - |
| E1-5 | Energy consumption and mix | - |
| E1-6 | Gross Scopes 1, 2, 3 and Total GHG emissions | - |
| E1-7 | GHG removals and GHG mitigation projects financed through carbon credits | - |
| E1-8 | Internal carbon pricing | - |
| E1-9 | Anticipated financial effects from material physical and transition risks and potential climate-related opportunities | - |

Table 09 – ESRS disclosure requirements – ESRS E1– Incorporation by reference

| Disclosure | ESRS S1 - Own Workforce – Incorporation by reference | Page |
|---|---|---|
| *Strategy* | | |
| ESRS S1, SBM-2 | Interests and views of stakeholders | - |
| ESRS S1, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business mode | - |
| *IRO* | | |
| S1-1 | Policies related to own workforce | - |
| S1-2 | Processes for engaging with own workers and workers' representatives about impacts | - |
| S1-3 | Processes to remediate negative impacts and channels for own workers to raise concerns | - |
| 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 action | - |
| *Metrics and targets* | | |
| S1-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | - |
| S1-6 | Characteristics of the undertaking's employee | - |
| S1-7 | Characteristics of non-employee workers in the undertaking's own workforce | - |
| S1-8 | Collective bargaining coverage and social dialogue | - |
| S1-9 | Diversity metrics | - |
| S1-10 | Adequate wages | -- |
| S1-11 | Social protection | - |
| S1-12 | Persons with disabilities | - |
| S1-13 | Training and skills development metrics | - |
| S1-14 | Health and safety metrics | - |
| S1-15 | Work-life balance metrics | - |
| S1-16 | Compensation metrics (pay gap and total compensation) | - |
| S1-17 | Incidents, complaints and severe human rights impacts | - |

Table 10 – ESRS disclosure requirements – ESRS S1– Incorporation by reference

| Disclosure | ESRS G1 - Business conduct – Incorporation by reference | Page |
|---|---|---|
| *Governance* | | |
| ESRS 2, GOV-1 | The role of the administrative, supervisory and management bodies | page 26 |
| *IRO* | | |
| ESRS 2, IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities | - |
| G1-1 | Business conduct policies and corporate culture | - |
| G1-2 | Management of relationships with suppliers | - |
| G1-3 | Prevention and detection of corruption and bribery | - |
| *Metrics and targets* | | |
| G1-4 | Incidents of corruption or bribery | - |
| G1-5 | Political influence and lobbying activities | - |
| G1-6 | Payment practices | - |

Table 11 – ESRS disclosure requirements – ESRS G1– Incorporation by reference

Unless indicated otherwise, information contained on websites mentioned in this sustainability statement does not form part of, and is not incorporated by reference into, this sustainability statement.

## 7.2.1.13 Disclosure of list of ESRS Disclosure Requirements published on a voluntary basis

The following list of ESRS disclosure requirements are published on a voluntary basis.

| Disclosure requirement | Sustainaibility statement topic | Reference | Page |
|---|---|---|---|
| ESRS E1-5 | Energy consumption and mix | - CDP integrated questionnaire<br>- PAI (5) - Table I - Annex I - CDR (EU) 2022/1288 | page 29 |
| ESRS S1-1 | Policies related to own workforce (Diversity Policy) | Investors' request (SFDR Art. 8 funds) | page 35 |
| ESRS S1-6 | Characteristics of employees (nu. of FTEs (average), nu. employee (average), positions) | Investors' request (SFDR Art. 8 funds) | page 39 |
| ESRS S1-8 | Collective bargaining coverage and social dialogue | Investors' request (SFDR Art. 8 funds) | page 40 |
| ESRS S1-9 | Diversity metrics | Investors' request (SFDR Art. 8 funds) | page 40 |
| ESRS S1-11 | Social protection | Investors' request (SFDR Art. 8 funds) | page 41 |
| ESRS S1-14 | Health & safety metrics | Investors' request (SFDR Art. 8 funds) | page 42 |
| ESRS S1-15 | Work-life balance metrics | Investors' request (SFDR Art. 8 funds) | page 42 |
| ESRS S1-16 | Remuneration metrics | Investors' request (SFDR Art. 8 funds) | page 43 |
| ESRS G1-5 | Political influence and lobbying activities | CDP integrated questionnaire | page 34 |

Table 12 – Voluntary disclosures

## 7.2.1.14 Negative materiality assessment

Considering GBL's activity (GBL as a responsible company i.e. as an investment holding company), the nature of GBL's operations (office activity), its size (83 employees in its own workforce at the end of FY2024), and the fact that GBL has no client-facing activities, ESRS E2 Pollution, ESRS E3 Water and marine resources, ESRS E4 Biodiversity, ESRS E5 Circular economy, ESRS S2 Workers in the value chain, ESRS S3 Affected communities, and ESRS S4 Consumers and end-users did not arise in the longlist initially prepared by GBL with the support from Equintel. These topics have been assessed as non-material for GBL. This has been confirmed by the Equintel DMA tool's outcome for GBL. Please note that GBL did not screen its sites and business activities to identify E2-E5 related IROs.

## 7.2.2 Environmental disclosures – ESRS E1 climate

### 7.2.2.1 Integration of sustainability-related performance in incentive schemes

GBL has put in place sustainability-related incentive schemes for its Chief Executive Officer. Please refer to the Corporate Governance chapter of the Annual Report for more details (§2.3 Remuneration policy, page 10).

### 7.2.2.2 Transition plan for climate change mitigation

GBL has developed a comprehensive climate transition plan. Considering ESRS E1-1 disclosure requirements, the content of the EFRAG Draft IG on Transition Plan for Climate Change Mitigation, and the specific nature of GBL's activity as an investment holding company, the key features of GBL's transition plan are summarized hereafter. Details of the different components of GBL's transition plan are provided in the subsequent sections.

Considering the challenges and threats of climate change, GBL publicly endorses the Paris Agreement under the United Nations Framework Convention on Climate Change ("UNFCCC") and supports the development of long-term adaptation and mitigation climate strategies for GBL and its portfolio of participations.

GBL's Board of Directors is actively involved in assessing and guiding the group's climate strategies, risk management policies, and performance objectives. GBL's climate risk management and climate policies are detailed hereafter (please refer to §7.2.2.3 Material impacts, risks and opportunities relating to climate change, page 26).

For GBL, as an investment holding company deploying permanent capital, the climate challenges and opportunities lie primarily in its ability to ensure alignment of its existing portfolio of participations to the long-term carbon trajectories induced by the Paris Agreement and the investment in assets benefiting from this structural shift.

In 2012, GBL initiated a structural rebalancing of its portfolio with the objective of diversifying, reinforcing toward growth and resilience, and optimizing potential to create value over the long term. Over the last decade, GBL progressively exited its exposure to fossil industries (e.g., energy, utilities or cement) to focus on sectors benefiting from megatrends shaping the economy (e.g., consumer experience, health, technology, sustainability or digitalization). This rebalancing has made a significant contribution to the decarbonization of the portfolio, with the carbon intensity of GBL's portfolio (GBL's greenhouse gas emissions scope 3 cat. 15 'Investments'[1] / GBL's Net Asset Value ("NAV")) divided by a factor 30 between FY2012 and FY2024.

GBL's 2025-2030 ESG commitments and climate transition plan are anchored on this trend and address both GBL as a "responsible company" and GBL as a "responsible investor" in delivering further progress. As a "responsible company", GBL is committed to minimizing its carbon footprint in line with the 1.5°C requirements as part of its overall climate transition plan. As a "responsible investor", GBL is dedicated to leveraging its influence on its portfolio companies to ensure they adopt 1.5°C climate-aligned strategies and targets. This commitment is part of GBL's broader climate transition plan aimed at further reducing the carbon footprint of its portfolio. GBL's 2025-2030 ESG commitments and climate transition plan have been reviewed and validated by GBL's Board of Directors.

Under its 2025-2030 ESG commitments, GBL committed to the Science Based Target initiative[2] ("SBTi") in May 2021. In January 2022, GBL became the first investment holding company on a global basis to have climate targets aligned with a 1.5°C pathway approved by SBTi for both its own operations and its eligible portfolio of participations. In 2023, due to the evolution of GBL Capital's governance and faster than anticipated progress towards its intermediary 2025 target, GBL-resubmitted to SBTi its baseline for validation and requested an uplift of its intermediary targets. Revised targets were validated in November 2023.

For its own operations, GBL retained the following target: "SBTi target #1: 52% reduction of its greenhouse gas emissions scope 1 (direct emissions) and scope 2 (electricity-related emissions) by 2030 from a 2019 baseline". GBL's scope 1 (direct) and scope 2 (indirect electricity-related, market-related methodology) greenhouse gas emissions stood at 236 $tCO_2e$ in FY2019 (baseline benefiting from PwC Bedrijfsrevisoren / Reviseurs d'Entreprises SRL limited assurance in GBL's FY2022 Annual Report and GBL's FY2023 Annual Report).

The promotion of leading energy efficiency across its different offices, the switch to 100% renewable electricity in its energy supply and the implementation of an ambitious clean mobility policy for GBL's own workforce support GBL's ability to deliver on this target for its own operations (SBTi target #1).

1 GHG Protocol (2012): GHG emissions scope 3 category 15 'Investments' based on equity-share methodology and GHG emissions scope 1 + scope 2 (market-based)
2 Ambitious corporate climate action - Science Based Targets Initiative (https://sciencebasedtargets.org)

The respective contribution of these different decarbonization levers to the achievement of GBL's 2030 SBTi target #1 is summarized in the table below.

| Decarbonisation levers (t. $CO_2e$) | FY2019 (base year) | FY2030 (target) |
|---|---|---|
| GHG emissions - Scopes 1 and 2 | 236 | 113 |
| Activity growth | | +13 |
| Use of renewable energy | | -76 |
| Clean mobility | | -55 |
| Energy efficiency and consumption reduction | | -5 |

Table 13 – Decarbonisation levers

As a "responsible investor", and covering indirectly the emissions stemming from its portfolio of investments (value chain), GBL retained the following target: "SBTi target #2: 100% of eligible portfolio positions with climate strategy and targets aligned with a 1.5°C pathway approved by SBTi by 2030 from a 2020 baseline. For this target, an intermediary target of 66% coverage (vs. 50% initially) by 2025 has been retained". Coverage stood at 0% in FY2020 (baseline benefiting from PwC Bedrijfsrevisoren / Reviseurs d'Entreprises SRL reasonable assurance in GBL's FY2022 Annual Report and GBL's FY2023 Annual Report).

The ESG integration approach supports GBL's ability to deliver on this target (SBTi target #2). Please refer to §7.3.1 Entity specific - ESG integration, page 47 for more information.

As of FY2024, GBL is on track with the implementation of its climate transition plan. In FY2024, GBL delivered a 53% decrease in its GHG emissions scope 1 and scope 2 versus the FY2019 baseline mainly due ongoing refurbishment of GBL's main office and the temporary relocation of GBL team in a significantly smaller office. With 78% of GBL's SBTi eligible NAV covered by 1.5°C SBTi-validated targets in FY2024, GBL delivered its intermediary coverage target (66% eligible NAV coverage by 2025) a year in advance.

At GBL's holding level, operational expenditures (OpEx) required for the implementation of GBL's climate transition plan cover primarily car fleet leasing and clean electricity supply. In FY2024, the financial resources allocated to support the implementation of the transition plan (OpEx) amounted to EUR 410,889.

At GBL holding level, due to the nature of its activity as an investment holding company, there is no CapEx required for the implementation of GBL's climate transition plan.

ESG integration-related CapEx and OpEx are disclosed as part of ESRS Entity Specific ESG integration disclosures.

GBL has no significant locked-in greenhouse gas emissions from its portfolio of participations. As an investment holding company, GBL's business model primarily focuses on deploying proprietary capital which inherently results in a lower direct carbon footprint compared with industries with significant physical assets.

Please refer to §7.3.2.3 Consolidated environmental disclosures - GHG, page 65.

Over the reporting period, no CapEx has been spent on either coal-related, oil-related or gas-related economic activities.

Pursuant to the Commission Delegated Regulation (EU) 2020/1818 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks, and based on its own assessment, GBL ("Groupe Bruxelles Lambert NV") as a listed entity does not foresee any significant challenges not to be eligible for inclusion in EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks.

## 7.2.2.3 Material impacts, risks and opportunities relating to climate change

Through the DMA process, GBL identified "*Climate change - Climate change mitigation*" sub-topic as an actual negative material impact over a long-term time horizon. It relates to the group's emissions and their impact on climate change, and encompasses GBL's endeavors to contribute to the general process of limiting the increase in the global average temperature to 1.5°C above pre-industrial levels in line with the Paris Agreement, GBL's own operations GHG emissions as defined by the GHG Protocol and the associated transition risks.

Considering the characteristics of GBL's operations, being mainly an office activity, and its small size workforce (83 employees in its own workforce at the end of FY2024), negative impact associated with climate change mitigation at a corporate level ("holding segment") remains in absolute terms negligible due to the limited direct and indirect electricity-related GHG emissions compared to GBL's GHG emissions scope 3 cat. 15 'Investments'. GBL does not expect a notable change in the potential impact of climate risks and opportunities on its own operations in the medium to long term.

For GBL, the actual negative material impact related to climate change mitigation is primarily indirectly driven by GBL's portfolio emissions. GBL's ESG integration approach supports GBL's ability to identify, assess and mitigate potential climate change mitigation and adaptation exposure in its portfolio of participations (please refer to §7.3.1 Entity specific - ESG integration, page 47).

From the pre-investment phase to the post-investment phase, climate IROs play a key role in the overall IROs' assessment and investment decision. In the pre-investment phase, climate change risks and opportunities are assessed as a standard risk through compliance with GBL's exclusion policy and the due diligence process and business case development. In the post-investment phase, climate change risks and opportunities are monitored as part of the implementation of the asset's climate strategy and policy. Since 2020, GBL has been conducting an in-depth analysis on GBL's portfolio participation potential exposure to climate transition and physical risks. This assessment notably aims to: (i) map the climate impact; (ii) identify the portfolio's maturity on this matter and its exposure to carbon pricing mechanisms; (iii) understand the portfolio's exposure to physical and climate transition risks; (iv) feed GBL's sustainable IRO management process (in particular the annual sustainable IRO review) and investment strategies and ultimately; and (v) support the development and implementation of long-term mitigation strategies for GBL and its portfolio of participations. Finally, climate change risk and opportunity analysis and the results of GBL's engagement with the participation on climate is supporting voting, stewardship, transparency requirement and/or exit decisions.

GBL's Board of Directors is involved on an ongoing basis in the assessment of GBL's and its portfolio of participations' exposure to climate IROs. GBL's Board of Directors includes climate IROs as an integral part of its overall assessment of the portfolio rotation strategy. The Audit Committee supervises the assessment process for IROs (the annual IRO review process) covering climate risks, climate dependencies and climate reporting audit and verification process. The Governance and Sustainable Development Committee focuses on the definition and monitoring of ESG KPIs for GBL's management team, including climate KPIs.

Over the course of its meetings and supported by the work of the Audit Committee and the Governance and Sustainable Development Committee, GBL's Board of Directors is therefore:

(i) Reviewing and guiding the climate strategy (long-term climate transition and decarbonisation strategy for GBL);

(ii) Reviewing and guiding major plans of action (implication of decarbonisation plan for portfolio rotation, approval of corporate policies (e.g., the GBL ESG Policy and its exclusion component) and commitments (e.g., SBTi commitment));

(iii) Reviewing and guiding risk management policies (e.g. assessment of climate transition and physical risks);

(iv) Reviewing and guiding annual budgets (e.g., OpEx related to climate initiative);

(v) Reviewing and guiding business plans (e.g., engagement with portfolio companies on SBTi 1.5C targets implementation);

(vi) Setting performance objectives (e.g., climate KPIs);

(vii) Monitoring the implementation and performance of objectives (e.g., clean mobility policy);

(viii) Overseeing major capital expenditures, acquisitions and divestitures (e.g., full divestment from Holcim in 2023); and

(ix) Monitoring and overseeing progress against goals and targets for addressing climate-related issues (e.g., SBTi commitment and follow up on progresses against targets, achievement of climate KPIs included in short-term and long-term incentive plans).

To ensure the quality of the annual climate risk assessment, GBL is gathering geo-localization data and key activity figures from all its portfolio companies for both their operational and office sites as well as for its corporate sites. Time horizons are defined in accordance with ESRS 1, §77. This level of granularity is supporting the production of a comprehensive mapping of GBL's portfolio climate transition and physical risk.

For climate transition risk and opportunity analysis, the modelling of future carbon prices is based on two different scenarios developed by the International Energy Agency ("IEA"): the stated policies scenario ("STEPS") and the net zero emissions scenario ("NZE"). The STEPS scenario is designed to provide a sense of the prevailing direction of energy system progressions based on a detailed review of the current policy landscape. The NZE scenario is a normative scenario showing a pathway to achieve net zero $CO_2$ emissions by 2050 consistent with limiting the global temperature rise to 1.5°C with at least a 50% probability. The company's decarbonization efforts are modelled under two pathways: the business-as-usual pathway ("BAU"), where emissions continue on their current trajectory, and the science-based targets pathway ("SBT"), where the company commits to significantly reducing emissions in line with global climate goals.

GBL calculates carbon costs by multiplying the price per ton of carbon in a given area by the company's forecasted total emissions. This calculation considers both the company's efforts to reduce emissions and external factors like the decarbonization of national energy mixes. The range of analysis provided by these four scenarios is offering a comprehensive mapping on potential climate transition risk and opportunity to GBL considering the nature of its investment holding activity. By 2030, GBL considered that the STEPS/SBT scenario shall prevails. Beyond 2030, a high level of uncertainty and methodological challenges remain to support any meaningful insight on portfolio and specific asset allocation.

For climate physical risk analysis, climate-related hazards are first identified using high emission scenarios like SSP 5-8.5 (Share Socioeconomic Pathways "Fossil-fueled Development") and SSP2-4.5 (Share Socioeconomic Pathways "Middle of the Road") developed by the Intergovernmental Panel on Climate Change (IPCC). SSP 5-8.5 assumes high economic growth, rapid technological advancements and heavy reliance on fossil fuels leading to high greenhouse gas emissions and a significant rise in global temperatures, severe climate impacts and substantial risks to ecosystems and human societies. SSP2-4.5 assumes moderate economic growth, balanced approach to energy sources and gradual technical progress supporting an intermediate level of emissions and resulting in a moderate increase in global temperature, manageable climate risks and potential for adaptation and mitigation under significant policy efforts.

Leveraging on the geo-localization data collected from its portfolio companies, GBL assesses how its assets and business activities may be exposed and vulnerable to these hazards. This exposure score combines future changes, based on differences between historical and projected data, and current hazards, evaluated using historical absolute values, with each component rated on a scale from 1 to 5. Each hazard has its own specific thresholds for historical absolute and projected change, based on literature review and best practices. The vulnerability of each site is determined by its sensitivity to climate risks and its adaptive capacity. Sensitivity is assessed at both the geographic and asset-specific levels. Adaptive capacity is evaluated based on the ability of the country or asset to limit the effects or cope with the hazard. GBL uses a combined score to consolidate both exposure and vulnerability into a single metric.

By 2023, all the participations included in the initial scope of the climate risk analysis program launched in 2020 as well as the participations acquired since 2021 have been covered in accordance with GBL's commitments. In 2024, as part of the annual update, GBL reviewed climate transition risk analysis and physical risk analysis for all portfolio participations (excluding GBL Capital and Sienna Investment Managers).

GBL's ESG integration process (please refer to §7.3.1 Entity specific - ESG integration, page 47) includes this in-depth climate physical and transition risk analysis. Emerging regulation developments and different likelihood, magnitude and duration of potential transition events are assessed on an ongoing basis and included when it comes to assessing transition risk and the outlook for long-term growth prospects and profitability of potential investments or existing portfolio's participations. In that process, GBL has not identified portfolio participations that are incompatible with or need significant efforts to be compatible with a transition to a climate-neutral economy.

Under the different climate scenarios considered in the medium and long term (as defined under ESRS 2) and even under high impact scenarios, the weighted percentage of EBITDA at risk (climate transition) for GBL and its portfolio is very low as is its weighted exposure to climate physical risks thanks to (i) no significant transition and physical risks related costs for its own operations, (ii) a well-diversified portfolio, (iii) the ongoing structural reduction of its exposure to carbon assets, and (iv) underlying companies demonstrating strong climate resilience (potential unpriced carbon costs expressed in percentage of each portfolio's participation EBITDA at Risk ranging from 0.07% to 7.68% to their respective EBITDA in 2030 under STEPS/SBT scenario).

The result of this assessment is reported yearly to GBL's Board of Directors. In the case of material climate risks identified in this assessment, they are monitored by GBL's representatives in the governance bodies of the portfolio companies. The result of these assessments is also discussed with the portfolio companies via dedicated climate meetings. Since 2024, GBL has been granting its portfolio companies access to GBL's climate dashboard, enabling them to view all the underlying physical and transition data that supports the climate risk analysis.

Due to the limited exposure to climate risks and the ability for GBL to mitigate such risks via its portfolio rebalancing, the different climate scenarios used are compatible with GBL's financial statements.

### 7.2.2.4 Climate policy

The ESG Policy reflects the core values that guide GBL on environmental, social and governance issues. It presents the commitments and implementation guidelines for GBL. It addresses the management of material IROs related to climate change and covers climate change adaptation, climate change mitigation, energy efficiency and renewable energy.

The ESG Policy's scope of application ("ESG scope") applies to GBL and its direct and indirect wholly-owned subsidiaries ("GBL as a "responsible company"). The companies within GBL's portfolio are included in the ESG scope under the "GBL as a "responsible investor" approach. Those companies identify and address their sustainable IROs within the framework of their own internal controls and governance.

The ESG Policy has been reviewed and approved by GBL's Board of Directors. The CEO is responsible for the oversight of the ESG Policy implementation (including but not restricted to its climate component) and he is supported in that matter by the Head of ESG. GBL's Board of Directors is assessing the ESG Policy implementation on a yearly basis.

As part of the ESG Policy implementation, GBL promotes transparency. For climate reporting, GBL in particular supports the adoption of the Task Force on Climate-related Financial Disclosures recommendations ("TCFD") and the disclosure of climate data to the CDP[1] via its ongoing engagement with its portfolio's participations. GBL also supports its portfolio's participations on their compliance journey with the latest European Union sustainable finance regulation requirements and, in particular, the Regulation (EU) 2019/2088 of the European Parliament and of the Council on Sustainability-related disclosures in the financial services sector (the "SFDR regulation"), the Regulation (EU) 2020/852 of the European Parliament and of the Council (the "Taxonomy regulation") and the Corporate Sustainability Reporting Directive (EU) 2022/2664 ("CSRD").

The ESG Policy is publicly available on GBL's website.

1 Home - CDP (https://www.cdp.net/en/)

## 7.2.2.5 Actions, resources and targets related to climate change

GBL approach to climate risks, GBL's ESG Policy and GBL's 2025-2030 ESG commitments guide the implementation of GBL climate transition plan, addressing both GBL as a "responsible company" and GBL as a "responsible investor" in delivering climate progress.

As a "responsible company", GBL is committed to minimizing its carbon footprint in line with the 1.5°C requirements as part of its overall climate transition plan. As a "responsible investor", GBL is dedicated to leveraging its influence on its portfolio companies to ensure they adopt 1.5°C climate-aligned strategies and targets. This commitment is part of GBL's broader climate transition plan aimed at further reducing the carbon footprint of its portfolio.

GBL's 2025-2030 ESG commitments and climate transition plan have been reviewed and validated by GBL's Board of Directors.

Under its 2025-2030 ESG commitments, GBL committed to SBTi in May 2021. In January 2022, GBL became the first investment holding company on a global basis to have climate targets aligned with a 1.5°C pathway approved by SBTi for both its own operations and its eligible portfolio of participations. In 2023, due to the evolution of GBL Capital's governance and faster than anticipated progress towards its intermediary 2025 target, GBL re-submitted to SBTi its baseline for validation and requested an uplift of its intermediary targets. Revised targets were validated in November 2023. Under the SBTi submission process, GBL's GHG reduction targets have been defined according to the GHG Protocol Equity Share methodology to ensure consistency with its GHG inventory.

For its own operations, GBL retained the following target: "SBTi target #1: 52% reduction of its greenhouse gas emissions scope 1 (direct emissions) and scope 2 (electricity-related emissions) by 2030 from a 2019 baseline". GBL's scope 1 (direct) and scope 2 (indirect electricity-related, market-based methodology) greenhouse gas emissions stood at 236 t$CO_2$e in FY2019. This baseline is representative of GBL's activities covered with limited influences from external factors and it benefits from PwC Bedrijfsrevisoren / Reviseurs d'Entreprises SRL limited assurance in GBL's FY2022 Annual Report and GBL's FY2023 Annual Report.

GBL aims to deliver on this target by leveraging on the following decarbonization levers: (i) ensuring leading energy efficiency practices in its offices; (ii) switching to 100% renewable electricity in its energy supply; and (iii) implementing an ambitious clean mobility policy. These initiatives are detailed below.

GBL promotes leading energy efficiency initiatives across its offices, none of which are owned by GBL. GBL therefore conducts regular engagement with the landlords of the premises it occupies. In 2024, this engagement concentrated on GBL's head office in Brussels and GBL Capital's new premises in London. GBL's head office building is currently being renovated with the aim to achieve HQE ("Haute Qualité Environnementale"), BREEAM Outstanding and $CO_2$ Neutral certifications. The renovation works started in 2023 and are expected to be completed during 2025. GBL Capital new premises in London were selected due to the location and advanced building sustainability management practices. The Suffolk Street building is designed in alignment with BREEAM and Greycoats net-zero carbon principles and features advanced energy and resource conservation practices: Habitat Plan enhancing biodiversity and green spaces surrounding the building, chemical-free cleaning, water conservation and energy efficiency further reducing the environmental footprint and energy consumption. Over the period 2019 (SBTi baseline) to 2030, 10% energy efficiency achieved across its premises would lead to a reduction of 5t. $CO_2$e (scope 1). There is no CapEx spending attached to such initiative for GBL. OpEx are related to rental costs of the premises and amounted to EUR 1.5 million in 2024.

GBL targets 100% of its electricity supply to come from renewable sources by the end of 2025. Over the period 2019 (SBTi baseline) to 2030, the switch to renewable electricity should support the reduction of 76t. $CO_2$e (scope 2). In 2024, GBL's offices in Brussels, Luxemburg, London and Milan already benefited from clean and renewable electricity sourcing and GHG emissions scope 2 electricity-related amounted to 6.7t. $CO_2$e (-91% from 2019 baseline). Considering the current pricing of electricity across GBL's locations, accessing renewable sources can be delivered at a negligible marginal cost compared with conventional sources. There is no CapEx spending attached to such initiative for GBL. OpEx are related to electricity costs of the premises benefiting from clean and/or renewable electricity and amounted to EUR 77,604 in 2024.

Finally, GBL adopted in 2021 under its ESG Policy an ambitious clean mobility policy ruling out internal combustion engine vehicles from employee's newly-acquired fleet of vehicles in favor of hybrid or electric vehicles. So far, 19 vehicles out of 37 have been converted from thermal to hybrid or electric power engines. GBL's own workforce is a prime beneficiary of this aspect of GBL's transition plan as GBL is offering the choice to employees benefiting from GBL's mobility policy of their desired clean mobility device (e.g., car leasing, bike leasing or public transportation) under a defined allowance. GBL's eligible own workforce also has the opportunity to opt in for multiple mobility devices under the defined allowance. Leasing contracts are directly negotiated by GBL and GBL may also offer specific support to its workforce for the installation at their home of adequate charging stations. Over the period 2019 (SBTi baseline) to 2030, the implementation of GBL's clean mobility policy is expected to lead to a reduction of 55t. $CO_2$e (scope 1). In FY2024, GHG emissions scope 1 related to "owned and leased car fleet" amounted to 69.2t $CO_2$e (-37% from 2019 baseline). Car fleet leasing contracts are leading to an OpEx of EUR 333,285 in GBL financial statements for FY2024.

GBL is on track with the implementation of the targets set out in its climate transition plan. GBL delivered in FY2024 a 53% decrease in its GHG emissions scope 1 and scope 2 versus FY2019 baseline mainly due ongoing refurbishment of GBL's main office and the temporary relocation of GBL team in a significantly smaller office.

GBL's ability to further delivering on its climate transition plan depends primarily on its ability to secure access to renewable energy sources.

As a "responsible investor", GBL retained the following target: "SBTi target #2: 100% of eligible portfolio positions with climate strategy and targets aligned with a 1.5°C pathway approved by SBTi by 2030 from a 2020 baseline. For this target, an intermediary target of 66% coverage (vs. 50% initially) by 2025 has been retained". Coverage stood at 0% in FY2020 (baseline benefiting from PwC Bedrijfsrevisoren / Reviseurs d'Entreprises SRL reasonable assurance in GBL's FY2022 Annual Report and GBL's FY2023 Annual Report). The ESG integration approach supports GBL's ability to deliver on this target (SBTi target #2). With 78% of GBL's SBTi eligible NAV covered by 1.5°C SBTi-validated targets in FY2024, GBL delivered its intermediary coverage target (66% eligible NAV coverage by 2025) a year in advance. Please refer to §7.3.3.2 SBTi coverage, page 80 for details on portfolio's companies individual achievements. CapEx and OpEx, current or future if any, are accounted under GBL's ESG integration related costs. Please refer to §7.3.1 Entity specific - ESG integration, page 47.

GBL expects the future financial resources allocated to the transition plan (CapEx and OpEx) to remain stable in the future. Please note that considering the nature of GBL activity (as an investment holding company), the way GBL is conducting its operations (e.g., offices being leased) and the decarbonization levers considered, there is very limited to no relationship between significant CapEx and OpEx required and the framework offered under the Commission Delegated Regulation (EU) 2021/2178.

### 7.2.2.6 Energy consumption

The table below summarises GBL's energy consumption.

| Categories (MWh) | FY2024 |
|---|---|
| Fuel consumption from coal and coal products | 0 |
| Fuel consumption from crude oil and petroleum products | 333 |
| Fuel consumption from natural gas | 187 |
| Fuel consumption from other fossil sources | 0 |
| Consumption of purchased of acquired electricity, heat, steam and cooling from fossil sources | 76 |
| **Total fossil energy consumption** | **595** |
| *Share of fossil sources in total energy consumption (%)* | *72%* |
| **Consumption from nuclear sources** | 33 |
| *Share of consumption from nuclear sources in total energy consumption (%)* | *4%* |
| Fuel consumption for renewable sources, inc. biomass | 0 |
| Consumption of purchased or acquired electricity, heat , steam and cooling from renewable sources | 231 |
| Consumption of self-generated non-fuel renewable energy | 0 |
| **Total renewable energy consumption** | **231** |
| *Share of renewable sources in total energy consumption* | *28%* |
| **Total energy consumption** | **827** |

Table 14 – Energy consumption

As an investment holding company operating in offices, GBL has no activity in high climate impact sector.

## 7.2.2.7 GHG emissions

The table below summarizes GBL's GHG emissions.

| GBL - t. $CO_2e$ | Base year (FY2019) | FY2023 | FY2024 | % N/N-1 | 2025 | 2030 | (2050) | Annual % target / Base year |
|---|---|---|---|---|---|---|---|---|
| **Scope 1 GHG emissions** | | | | | | | | |
| Direct emissions | 160 | 162 | 103 | -36% | | 77 | | -4.7% |
| Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%) | 0% | 0% | 0% | - | | - | | |
| **Scope 2 GHG emissions** | | | | | | | | |
| Indirect electricity-related emissions – Location-based | 76 | 34 | 42 | 23% | | - | | |
| Indirect electricity-related emissions – Market-based | 76 | 5 | 7 | 43% | | 37 | | -4.7% |
| **Scope 3 GHG emissions** | | | | | | | | |
| Total Scope 3 GHG emissions (ESRS) | 18,106,888 | 13,407,673 | 17,071,460 | 27% | | | | |
| Cat. 1 – Purchase goods and services | ns [1] | ns | 78 | - | | | | |
| Cat. 2 – Capital goods | ns | 6 | 9 | 49% | | | | |
| Cat. 3 – Upstream from scope 1 & scope 2 | 41 | 42 | 36 | -14% | | | | |
| Cat. 4 – Upstream transportation and distribution | ns | ns | ns | - | | | | |
| Cat. 5 – Waste | ns | 1 | 1 | 81% | | | | |
| Cat. 6 – Business travel | 601 | 641 | 594 | -7% | | | | |
| Cat. 7 – Employee commuting | 3 | 19 | 22 | 18% | | | | |
| Cat. 8 – Upstream leased assets | ns | ns | ns | - | | | | |
| Cat. 9 – Downstream transportation and distribution | ns | ns | ns | - | | | | |
| Cat. 10 – Processing of sold products | ns | ns | ns | - | | | | |
| Cat. 11 – Use of sold products | ns | ns | ns | - | | | | |
| Cat. 12 – End-of-life treatment of sold products | ns | ns | ns | - | | | | |
| Cat. 13 – Downstream leased assets | ns | ns | ns | - | | | | |
| Cat. 14 – Franchises | ns | ns | ns | - | | | | |
| Cat. 15a – Investments (GHG Protocol, equity share methodology based on scope 1 + scope 2)[2] | 11,515,146 | 1,393,587 | 1,320,192 | -5% | | | | |
| Cat. 15b – Investments (ESRS E1 46h(iii), scope 3)[2] | 6,591,097 | 12,013,377 | 15,750,528 | 31% | | | | |
| **Total GHG emissions - ESRS** | | | | | | | | |
| Total GHG emissions (location-based) - ESRS | 18,107,124 | 13,407,869 | 17,071,605 | 27% | | | | |
| Total GHG emissions (market-based) - ESRS | 18,107,124 | 13,407,839 | 17,071,570 | 27% | | | | |

1 Non significant
2 Please refer to GBL GHG emissions – Portfolio level (FY2024) table (§7.3.3.1 Non-controlled investments' GHG emissions, page 79)

| GBL - t. $CO_2e$ | Base year (FY2019) | FY2023 | FY2024 | % N/N-1 | 2025 | 2030 | (2050) | Annual % target / Base year |
|---|---|---|---|---|---|---|---|---|
| **Total GHG emissions - GHG Protocol** | | | | | | | | |
| Scope 1 + scope 2 (market-based) | 236 | 167 | 110 | -34% | | | | |
| Scope 1 + scope 2 (market-based) + scope 3 (ex-inv.) | 881 | 875 | 851 | -3% | | | | |
| Scope 3 | 11,515,791 | 1,394,295 | 1,320,932 | -5% | | | | |
| Total GHG emissions (location-based) | 11,516,027 | 1,394,491 | 1,321,077 | -5% | | | | |
| Total GHG emissions (market-based) | 11,516,027 | 1,394,462 | 1,321,042 | -5% | | | | |
| **Intensity ratio** | | | | | | | | |
| *Revenues* | -[1] | -[2] | -[2] | | | | | |
| Intensity ratio: Total GHG emissions (location-based) / Net revenue | -[3] | -[4] | -[4] | | | | | |
| Intensity ratio: Total GHG emissions (market-based) / Net revenue | -[4] | -[4] | -[4] | | | | | |
| *Number of FTEs* | *42.7* | *78.3* | *81.3* | *4%* | | | | |
| Intensity ratio: (scope 1 + scope 2 (market-based)) / nu. FTEs (t. $CO_2e$/FTE) | 5.5 | 2.1 | 1.4 | -37% | | | | |
| Intensity ratio: (all scopes (market-based) ex-inv.) / nu. FTEs (t. $CO_2e$/FTE) | 20.6 | 11.2 | 10.5 | -6% | | | | |
| *NAV (EUR million)* | *20,627* | *17,488* | *15,290* | *-13%* | | | | |
| Intensity ratio: scope 3 investments (GHG Protocol) / NAV (t. $CO_2e$ / EUR million) | 558 | 80 | 86 | 8% | | | | |

Table 15 – GBL GHG Emissions (GHG Protocol)

The table below summarizes the main assumptions and sources used for the production of the GHG reporting.

| Scope | Categories | Emissions inventory | Assumptions | Sources |
|---|---|---|---|---|
| Scope 1 | Energy | Included, fully covered | No specific assumption | Ademe |
| Scope 1 | Company cars | Included, fully covered | GBL's fuel-based fleet | Ademe |
| Scope 1 | Refrigerant leakages | Included, fully covered | No specific assumption | Ademe |
| Scope 2 | Electricity | Included, fully covered | Includes GBL's electric-based fleet | Ademe |
| Scope 3 | Cat. 1 – Purchase goods and services | Included | Partial coverage based on Sienna VC and Sienna PE FY2023 figures | Ademe |
| Scope 3 | Cat. 2 – Capital goods | Included | Calculations based on office floor areas | Ademe |
| Scope 3 | Cat. 3 – Upstream from scope 1 & scope 2 | Included | No specific assumption, calculations based on consumptions measured for scope 1 & 2 calculations | IEA |
| Scope 3 | Cat. 4 – Upstream transportation and distribution | Not included. Non-significant for GBL | / | / |
| Scope 3 | Cat. 5 – Waste | Included | No specific assumption, calculations based on nu. of employees | Ademe |

1 No revenue recognized for GBL holding. Cf. Note 8, Consolidated financial statements 'Turnover'
2 Please refer to GBL GHG emissions – Portfolio level (FY2024) table (§7.3.3.1 Non-controlled investments' GHG emissions, page 79)
3 For an investment holding company, an intensity ratio based on revenue metric is non-relevant. Intensity ratio based on FTEs to assess own operations or on NAV to assess portfolio carbon intensity shall be considered (cf. specific disclosures hereafter in the table)
4 Please refer to GBL GHG emissions – Portfolio level (FY2024) table (§7.3.3.1 Non-controlled investments' GHG emissions, page 79)

| Scope | Categories | Emissions inventory | Assumptions | Sources |
|---|---|---|---|---|
| Scope 3 | Cat. 6 – Business travel | Included | No specific assumption | DEFRA |
| Scope 3 | Cat. 7 – Employee commuting | No specific assumption | No specific assumption | Ademe |
| Scope 3 | Cat. 8 – Upstream leased assets | Not included. Non-significant for GBL | / | / |
| Scope 3 | Cat. 9 – Downstream transportation and distribution | Not included. Non-significant for GBL | / | / |
| Scope 3 | Cat. 10 – Processing of sold products | Not included. Non-significant for GBL | / | / |
| Scope 3 | Cat. 11 – Use of sold products | Not included. Non-significant for GBL | / | / |
| Scope 3 | Cat. 12 – End-of-life treatment of sold products | Not included. Non-significant for GBL | / | / |
| Scope 3 | Cat. 13 – Downstream leased assets | Not included. Non-significant for GBL | / | / |
| Scope 3 | Cat. 14 – Franchises | Not included. Non-significant for GBL | / | / |
| Scope 3 | Cat. 15 – Investments | Included | Non-consolidated assets GHG emissions: FY2023 used if FY2024 not available by the time of the production of the report<br>GBL Capital GHG emissions: extrapolation based on GICS codes and geographical distribution of funds for 6.4% of GBL NAV | Bloomberg, CDP |

Table 16 – GHG reporting key assumptions and sources

GBL's scope 3 GHG emissions category 15 "investments" represent 99.99% of GBL's total GHG emissions. Quantitative metrics used for GHG scope 3 calculations can be subject to high level of measurement uncertainty. Please refer to the table above and the subsequent disclosures made by GBL's consolidated entities on the use of value chain estimates (please refer to §7.4 Appendix, page 81).

At the time of the Annual Report completion, GHG emissions for FY2024 have been publicly disclosed by GBL's portfolio participations representing 86% of GBL's GHG emissions and 78% of GBL's NAV. When not available, the scope 1, 2 and 3 emissions data for FY2024 have been directly carried over from FY2023 without any upward or downward extrapolation. This approach ensures that the emissions calculation remains based on actual, reported data rather than speculative estimates. Given that emissions can fluctuate due to various factors—such as operational changes, market conditions, or methodological adjustments—any extrapolation at this stage could introduce unnecessary distortions. Instead, refinements will be made progressively throughout the year as more precise data becomes available, ensuring that the 2026 calculations are based on the most accurate and updated information.

At the time of the Annual Report completion, GHG emissions neither for FY2023 nor for FY2024 have been publicly disclosed by some of GBL Capital's investments representing 6.4% of GBL's NAV. For these investments, emissions factor intensity for scope 1, 2 and 3 linked to geographical regions and global industry classification standard ("GICS") codes have been used. For some alternative investment funds GBL Capital may be exposed to, GHG profile was reflecting the alternative fund's underlying exposure and activity-based resulting in a composite emission factor.

## 7.2.2.8 GHG mitigation projects financed through carbon credits

Under its 2025-2030 ESG commitments, GBL aims to invest in projects in order to balance its carbon footprint related to its direct and indirect emissions excluding its portfolio's emissions (GHG Protocol, Scope 3 – Category 15 Investments, equity-share accounting methodology). GBL achieves this by acquiring and cancelling voluntary carbon certificates attached to specific projects and issued by recognized organizations.

In line with GBL ACT's selected areas of intervention (please refer to §7.2.5 Entity specific – Philanthropy, page 46), one project (100% reduction, 0% removal), currently active and related to the promotion and implementation of clean water filters in Kenya was selected to source carbon certificates.

In FY2024, verified emission reduction credits (certified Gold Standard credits) were acquired to compensate 761t. $CO_2e$ corresponding to GBL's FY2023 residual carbon footprint (direct and indirect emissions excluding portfolio emissions). These credits were cancelled during the year.

## 7.2.2.9 Internal carbon pricing

GBL refers to its internal carbon pricing scheme, a shadow price, to seek to drive low-carbon investment, to identify and evaluate financing opportunities, to identify and seize low-carbon opportunities, to navigate regulations and to stress test investments. Due to the distribution of GHG emissions at GBL with scope 3 category 15 representing more than 99.9% of GBL's overall emissions, internal carbon pricing schemes are predominantly used to cover scope 3 categories emissions, the other categories being non-significant.

Different factors are considered when determining the internal carbon price: (i) the alignment with scientific guidance and the 1.5°C trajectory set forth by the Paris Agreement; (ii) the alignment with the price of allowances under an emissions trading scheme; (iii) the cost of required measures to achieve climate-related targets; and (iv) scenario analysis.

The methodology and assumptions made for setting up a shadow carbon price based on the EU ETS are primarily structured around the following components: (i) maintenance of a database of publicly available information on current carbon prices across multiple geographies; (ii) development of carbon price scenarios based on different trajectories informed by climate change modelling and published research by organizations such as OECD, IEA, Climate Action Tracker, Climate Analytics, and New Climate; and (iii) the modeling of carbon cost pass-through.

Internal carbon price used by GBL can therefore be differentiated depending on national or regional carbon markets considered. Considering current carbon market dynamic and the ongoing development of national or regional carbon markets in different parts of the world, GBL assumes an average EUR 100 / t.$CO_2$e up to 2025. For the period 2025-2030, GBL expects carbon prices to be on an upward trend with the potential to reach EUR 80-120 / t.$CO_2$e by 2030. GBL also expects carbon prices to remain higher in Europe than in the US or in emerging Asia.

GBL, as an active and engaged institutional investor, is actively contributing to its portfolio companies' climate strategy elaboration and climate risk management initiative programs via its involvement in their Board of Directors, Audit Committee, Strategy Committee or Nomination and Remuneration Committee. Internal carbon price tools are then used to assess the climate strategy and risk management programs proposals made by the management of these companies or the medium and long term cost and impact on EBITDA of carbon compensation schemes or the constitution of carbon offset reserves by the portfolio's companies for example.

Following GBL's divestment from Holcim, GBL's portfolio companies which are most exposed to climate transition risk are active in the materials industries. For these industries in particular, historical carbon emissions, future carbon emissions trajectories and emissions reduction unit allocations are analyzed to determine the potential gap in carbon allowances and future impact on costs and profitability based on internal carbon pricing and carbon compliance requirements.

Due to the uncertainty related to the development of carbon markets outside Europe (e.g. Asia and China) and the potential for Europe to impose a carbon border tax, a conservative EUR 100 / t.$CO_2$e internal carbon price is used independently of the geographical location of the assets across GBL's portfolio. Leveraging on internal carbon prices, GBL's representatives in the investees' governance bodies will challenge: (i) the profitability of the investment and CapEx plans proposed by the management, and (ii) the implications in terms of carbon budget and carbon position outlook (overall long/short position and carbon compliance strategy) for this participation. This will impact the decision made on the development of certain product or business lines in GBL's portfolio companies or the location of such investments.

As GBL's internal carbon pricing schemes are predominantly used as part of the ESG integration approach described below (§7.3.1 Entity specific – ESG integration, page 47), carbon prices used in internal carbon pricing schemes are consistent with those used in financial statement.

## 7.2.2.10 Recognition

Beyond the non-financial information disclosure in regulatory filings and in its Annual Report, GBL is also disclosing its climate achievements under the CDP annual reporting process. In the last CDP assessment (2024 reporting cycle released in February 2025), GBL has been retained in "CDP Climate A-List".

## 7.2.3 Social information - ESRS S1 - Own workforce

### 7.2.3.1 Interests and views of stakeholders

GBL, as an investment holding company deploying permanent capital over a long term investment time horizon relies on a seasoned and highly skilled investment professional workforce. GBL's family heritage gives it a unique perspective and its time horizon is multigenerational. GBL's corporate culture therefore plays an important role for employee motivation and retention. In order to live up to its mission statement of "Delivering meaningful growth", GBL aims to ensure its access to the right pool of talents in the markets it operates. This requires GBL to provide own workforce with competitive remuneration packages as well as an appealing growth trajectory.

### 7.2.3.2 Own workforce material impacts, risks and opportunities

Through the DMA process and as described above, GBL identified its own workforce as a key stakeholder. Considering the size of GBL, GBL views its own workforce as a homogenous group to support the assessment of potential material risks and opportunities arising from impacts and dependencies on people in its own workforce.

All people in GBL's own workforce who can be materially impacted by the undertaking are included in the scope of disclosure in this consolidated sustainability statement.

GBL's requirements to disclose whether and how actual and potential impacts on its own workforce (i) originate from or are connected to GBL's strategy and business models, and (ii) inform and contribute to adapting GBL's strategy and business models, are available above (please refer to §7.2.1 General information, page 9).

GBL employed at the end of FY2024 83 employees and welcomed 5 non-employees in its own workforce. GBL's non-employees in its own workforce are predominantly advisors or experts in a dedicated field (e.g. investment, IT/AI). 4% of GBL's own workforce are employed in C-level positions (e.g. CEO, CFO, COO), 40% in non-executive senior or investment-related positions (e.g. investment professionals, heads of department or senior managers), and 56% in supporting functions (e.g. professionals, assistants or support to office operations).

Through the DMA process, GBL has not identified any material negative impact related to its own workforce (actual or potential).

Through the DMA process, GBL identified "*Own workforce – Equal treatment and opportunities for all – Training and skills development*" sub-sub-topic as a positive actual material impact over a medium term horizon for GBL's own operations. Leveraging on the annual review process outcome or on an ad hoc basis, it relates to individualized coaching, mentoring and educational programs such as leadership courses or bespoke training sessions. Such programs positively support GBL's own workforce overall expertise, skills, knowledge and productivity and improve satisfaction and employee retention.

It relates to individualized coaching, mentoring and educational programs such as leadership courses and bespoke training sessions. Such programs positively support GBL's own workforce overall expertise, skills, knowledge and productivity and improve satisfaction and employee retention;

Through the DMA process, GBL identified *"Philanthropy"* as entity-specific sub-sub-topic associated with positive actual material impact over a medium-term horizon. Carried out under the GBL ACT initiative and related to GBL's own operations, GBL's philanthropic activities are conducted under a truly philanthropic philosophy and approach aiming for a local positive impact across well-defined areas of intervention like education, healthcare, environmental protection or, social justice. Beyond the positive local contribution to the environment and the society, GBL ACT supports employee's motivation and retention.

Through the DMA process, GBL identified "*Own workforce – Working conditions – Adequate wage*" sub-sub-topic as a risk over a medium-term time horizon. GBL's ability to access the right pool of talents in the financial industry in Continental Europe may require providing employees with market-competitive remuneration packages to ensure talent attraction and retention. The inability of GBL to provide such market-competitive remuneration packages may impede its ability to properly execute its strategy. GBL's Remuneration Policy is addressing this risk.

Considering the size of GBL (83 employees in own workforce at the end of FY2024), the concentration of activity on well-defined locations (54% of the own workforce is working in GBL's main office in Brussels, Belgium) and the ability of GBL's management team to gain proper insight due to this proximity, no specific situation of greater risk of incidents of forced labor, compulsory labor or child labor has been identified. As an investment holding company benefiting from a highly skilled workforce and a robust recruitment process, GBL considers there to be a very limited risk of incident of forced labor, compulsory labor or child labor for GBL in its own operations.

GBL's stakeholders active in its value chain are primarily external support providers (e.g. auditors, lawyers, financial advisors) or landlords and facilities contractors (given that all of GBL's offices are leased). Considering the nature of the contractual and commercial relationships between GBL and these stakeholders and GBL's ongoing engagement practices, GBL has no reason to believe, as at the date of this consolidated sustainability statement, that these relationships are material based on past practices. GBL therefore considers that, as at this stage, sustainability topics and related IROs for these groups are not relevant for its own stakeholder engagement strategy.

## 7.2.3.3 Policies to manage material impacts, risks and opportunities related to the workforce

GBL's Board of Directors oversees IRO-related strategic orientations, policies, projects, resources, performance, reporting and related processes.

The Governance and Sustainable Development Committee reviews and assesses IROs related to GBL acting in its capacity as a "responsible company" on an on-going basis (please refer to §7.2.1 General information, page 9). Conclusions from each Governance and Sustainable Development Committee meeting are reported to the Board of Directors by its Chairwoman.

In application of the ESG integration approach, the Audit Committee reviews and assesses on a yearly basis the risks inherent to GBL acting as a "responsible investor", including an IRO-specific risk assessment performed as part of the portfolio monitoring process (please refer to §7.3.1 Entity specific - ESG integration, page 47).

In accordance with the CSRD requirements as implemented into Belgian law, the tasks of the Audit Committee have been extended in 2024 to monitor sustainability reporting including: (i) informing the Board of Directors about the outcome of the assurance of sustainability reporting, and how the assurance contributed to the integrity of sustainability reporting, including what the role was of the Audit Committee in the process; (ii) monitoring the sustainability reporting process; (iii) monitoring the internal control and risk management systems with regards to sustainability reporting; (iv) monitoring the assurance of sustainability reporting; and (v) monitoring the independence of the independent assurance services provider. The Audit Committee has been carrying out these tasks on an ongoing basis through the year 2024. Conclusions from each Audit Committee meeting are reported to the Board of Directors by its Chairwoman.

The CEO is responsible for the oversight of GBL's workforce strategy definition and implementation. He relies on the expertise of the Head of HR. GBL believes however that, in addition to giving the tone at the top, an effective corporate culture requires widespread workforce engagement to ensure alignment with GBL's strategy. All corporate functions are therefore involved, primarily: (i) the investment team in charge of deploying GBL's ESG integration approach as a "responsible investor" at each stage of the investment cycle; (ii) the Chief Financial Officer in charge of GBL's overall risk framework; (iii) the General Secretary and the legal and human resources departments in charge of social and governance matters; (iv) the Head of ESG in charge of environmental matters and; (v) the Head of Communication in charge of internal and external communication.

GBL's policies addressing the management of the impacts on its own workforce are detailed in GBL's work regulation (the "Work Regulation"), GBL's Diversity & Inclusion Policy (the "D&I Policy"), the Remuneration Policy, the ESG Policy, and the Code. The key content of these policies is summarized hereafter:

- Work Regulation: the Work Regulation describes the work regulations applying to GBL's workforce and covers among other things (but not limited to) working conditions, remuneration, psychosocial risks and training and skills development;
- D&I Policy: the D&I Policy supports and facilitates a diverse and inclusive environment that embraces differences and recognizes their benefits. These differences can be notably age, gender, sexual identity and orientation, disability, ethnicity, cultural and religious background;
- Remuneration Policy: the Remuneration Policy sets the principles in terms of alignment of GBL's CEO remuneration with GBL's interests and addresses in particular the provision of adequate wages. It is submitted for vote to GBL's Ordinary General Meeting on a regular basis and was last approved on May 2, 2024;
- ESG Policy: the ESG Policy reflects the core values that guide GBL on environmental, social and governance issues. It presents the commitments and implementation guidelines for the teams;
- Code of Conduct and Ethics: the Code provides guidance in conducting business activities in accordance with the highest legal, ethical and professional standards. It is made available to the workforce and the Directors, and notably covers compliance, responsible management, conflicts of interest, anti-corruption and anti-bribery, relations with third parties, respect at work and non-discrimination.

The Work Regulation, the D&I Policy, the Remuneration Policy, the ESG Policy as well as the Code apply to GBL as a "responsible company", i.e., the parent company GBL SA and its 100% direct and indirectly own subsidiaries (please refer to §7.1 Basis for preparation statement, page 4).

The Code, the ESG Policy, the Remuneration Policy and the D&I Policy have been formally reviewed and approved by GBL's Board of Directors with the support from the Governance and Sustainability Committee. The Work Regulation and associated local declinations, being by nature more operational, have been reviewed and approved by GBL's Operational Management Committee, which includes representatives from GBL's senior management and different operational departments (e.g. Finance department, General Secretariat, Human Resources department, Communication department, IT department).

The Code, the ESG Policy, and the D&I Policy are publicly available on GBL's website. The Remuneration Policy is made available to the public via GBL's Annual Report publication. The Work Regulation is shared with each new employee and GBL's workforce can access it in GBL's premises.

Through these policies, GBL is committed to carrying out its business ethically and in accordance with all applicable laws and regulations.

GBL has been formally committed to the United Nations Global Compact ("UNGC") initiative since 2018. Adhering to the UNGC and its 10 principles (covering human rights, labor, environment and anti-corruption) allowed GBL to cover all general areas that could be impacted by its activities. Under its commitment to the UNGC initiative, and its ESG Policy, GBL recognizes in particular the provisions offered by the UN Guiding Principles on Human Rights and the Organisation of Economic Co-operation and Development ("OECD") Guidelines for Multinational Enterprises.

GBL believes that respecting and protecting human rights is fundamental to creating long-term sustainable value. Implementation efforts at GBL's level include raising its own workforce's awareness for corporate values and related human rights, including freedom of speech and opinion, access to fair compensation and absence of discrimination. Human rights' potential direct and indirect impacts are taken into account when dealing with business partners, if material and relevant. Through the DMA process and considering the size of GBL, its highly skilled workforce, the recruitment process and the ability of GBL's management team to gain proper insight due to its proximity with the workforce, no specific situation of potential human rights risk has, as at this stage, been identified within the context of the DMA.

GBL is committed to the proper application of corporate governance provisions. As stated in GBL's Corporate Governance Charter (the "Charter"), GBL strives to apply diversity to the composition of its governance bodies and this notwithstanding the presence of a controlling shareholder. Therefore, with regards to the selection of new Directors and management (e.g., C-level positions), GBL applies diversity criteria while policies and actions are in place to combat discrimination.

As an employer, GBL believes that value creation notably stems from its ability to attract and retain talented individuals with diverse educational backgrounds, with complementary skills and experience and with a sound moral and ethical foundation. GBL actively supports a culture of development and performance and aspire to create flexible, balanced workplaces free of discrimination, with special attention to the value of diversity and personal well-being. This approach aimed at ensuring a diverse working environment, is set out in the D&I Policy and the Code.

The Code, the Work Regulation and actions are in place to combat discrimination, whether based on age, ethnicity or presumed race, family situation, gender identity, disability, state of health, physical appearance, place of residence, political or religious opinions, sexual behavior or orientation or any other perceptible difference. Employees are prohibited from treating one of their stakeholders less favorably on the basis of the discriminatory criteria identified previously and from using said criteria to justify a decision in favor of or against any stakeholder. Each employee must insist on respect for themselves as a person as well as their colleagues, either directly or by consulting the Human Resources Direction so that it can take all measures likely to stop discriminatory behavior. Any Director or employee of GBL who considers that it has been unlawfully discriminated against in matters covered by the D&I Policy may raise a complaint through GBL's Compliance Officer. On an annual basis, the Governance and Sustainable Development Committee and the Executive Management will assess the performance in view of GBL diversity objectives and commitments.

Through the DMA process, GBL identified its own workforce as a key stakeholder. Considering the size of GBL, GBL considers that its own workforce is a homogenous group to support the assessment of potential material risks and opportunities arising from impacts and dependencies on people in its own workforce. Therefore, due to the lack of specific groups or groups at risk identified in its own workforce, there is no base for specific policy commitments targeting specific groups.

## 7.2.3.4 Processes for engaging with own workers and workers' representatives about impacts

GBL aims to create an environment where people are valued, supported and empowered to be successful both personally and professionally. While GBL's Board of Directors, with the support from the Governance and Sustainable Development Committee and the Audit Committee oversees the engagement process with GBL's own workforce, the CEO is responsible for the implementation of the engagement strategy and for this he relies on the expertise of the Head of HR.

As at the end of FY2024, GBL had a headcount of 83 employees in its own workforce. This size allows dialogue to be based on proximity and trust between management and the workforce. As an employer, GBL acknowledges that value creation derives from, among other things, its ability to establish a pool of skilled talents adhering to GBL's ethical values without gender or background bias. These talents are a major asset for GBL as an investment company. GBL commits to the following principles: (i) creating a positive and long-term working relationship with its employees; (ii) providing a diverse and inclusive workplace in which people are treated with respect, dignity and fairness; (iii) enabling equal opportunities in employment, appointment and advancement based on appropriate qualifications, requirements and performance; and (iv) ensuring a safe and healthy workplace environment. GBL's Code and D&I Policy develop these principles and further indicates to whom all employees can refer should any question or doubt arise.

Beyond this proximity, in order to ensure proper engagement with its own workforce, GBL leverages on a number of different processes (e.g. DMA, semi-annual and annual assessment), instances (e.g. Operational Management Committee, O2 Committee, Investment Offsite (each described below)) and tools (e.g. engagement survey) to gather perspectives from its own workforce in a structured way in order to inform decisions aiming at managing actual and potential impacts. The perspectives collected through these different processes, instances and tools are analyzed by GBL's management and reported to GBL's Board of Directors and GBL's Governance and Sustainable Development Committee to manage actual and potential impacts.

In accordance with the CSRD and from FY2024 onwards, the DMA process is conducted annually and supports GBL in managing the material sustainability IROs attached to its own workforce (please refer to §7.2.1.8 Process to identify and assess material impacts, risks and opportunities, page 12). Under GBL's DMA process, GBL's own workforce has been identified as affected stakeholders and an employees' representative specifically appointed for that purpose participated in the IRO identification process. The outcome of GBL's DMA process has been presented to GBL's own workforce.

The Investment Offsite, chaired by the CEO, gathers GBL's investment professionals on an annual basis to engage on GBL's investment strategy, GBL's business model and the associated resources and development plans. It supports the identification of potential IROs as well as the link between the IROs and the business model. It offers an action plan for addressing and mitigating potential IROs.

The Operational Management Committee includes representatives from GBL's senior management and different operational departments (e.g. Finance department, General Secretariat, Human Resources department, Communication department, IT department). The Operational Management Committee meets on a bi-weekly basis and ensures a proper management and follow-up on engagement happening with GBL's own workforce.

The O2 Committee, chaired by the Corporate Secretary with the support from the Head of HR gathers all the employees in supporting functions on a bi-weekly basis. It enables a direct engagement with this specific category of employees on day-to-day activities and supports the identification of potential actions needed in response to particular actual or potential impact on the own workforce.

The assessment process plays an important role in the ability of the management to engage with GBL's own workforce. Structured around the semi-annual assessment meeting and the annual assessment meeting, it offers the opportunity to discuss and review each employee's development and career objectives.

Finally, GBL is also conducting on an ongoing basis an assessment of the level of satisfaction and engagement of its own workforce. GBL ensures that each employee's satisfaction and engagement is measured at least monthly via dedicated and targeted surveys.

## 7.2.3.5 Processes to remediate negative impacts and channels for own workers to raise concerns

GBL's size allows a constant dialogue based on proximity and trust between management and the workforce. Beyond this proximity, the engagement activities carried out by GBL with its workforce via notably the Operational Management Committee or the O2 Committee support the early identification of potential impact on people in its workforce and offer an opportunity to track their resolution and to monitor the effectiveness of the different channels. On an on-going basis, GBL's monthly engagement survey is also supporting the assessment made by GBL's management of its employees' engagement level and the effectiveness of the structures and processes in place to raise their concerns and have them addressed.

Cooperation and involvement of all employees is expected in order to ensure compliance with the D&I Policy, the Code and the Work regulation either directly by exemplary behavior or indirectly by approaching the Head of HR, the Compliance Officer or ultimately, by reporting any breach confidentially through the Whistleblowing Procedure.

Grievance or complaints handling mechanisms related to employee matters at GBL is formalized under the Code and the Whistleblowing Procedure. All people in own workforce may exercise their right to securely report an actual or potential violation of the Code or any other violation covered by the Whistleblowing Procedure. Reporting via the scheme is confidential and the employee, when acting in good faith and in compliance with the rules of the Whistleblowing Procedure, shall not be subject to reprisal.

The Code, the D&I Policy, and the Work Regulation are distributed to all employees and can be accessed on GBL's website or internal shared folder. GBL aims to ensure that all people in own workforce are trained in the Code, the D&I Policy and the Work Regulation so that they adopt best practices in the context of their activities. GBL is particularly committed to raising awareness among its employees of GBL's values and practices and organizes on a yearly basis mandatory training for its entire workforce.

Ultimately, the effectiveness of the channel offered by the Whistleblowing Procedure is reviewed on an annual basis by GBL's Governance and Sustainable Development Committee.

## 7.2.3.6 Actions and resources in relation to own workforce

Through the DMA process, GBL identified "Own workforce – Equal treatment and opportunities for all – Training and skills development" sub-sub-topic as a positive actual material impact over a medium term horizon for GBL's own operations. Leveraging on the annual review process outcome or on an ad hoc basis, it relates to individualized coaching, mentoring and educational programs such as leadership courses or bespoke training sessions matching the specific requirements of GBL's own employee population and its intrinsic characteristics in terms of seniority, expertise and growth trajectory with the aim to deliver positive mid-term benefits.

The annual review process and the subsequent formalization of the training development plan play a key role in the ability of GBL to deliver positive impact in this sub-sub-topic. The development plan discussed and validated by the line managers and the Head of HR is implemented within a 12-month time horizon post the relevant year-end discussion. The half-year review offers the ability to track intermediary progress towards the implementation of the development plan. GBL's own workforce benefits from it.

Through the DMA process, GBL identified "Own workforce – Working conditions – Adequate wage" sub-sub-topic as a risk over a medium-term time horizon. GBL's ability to access the right pool of talents in the competitive financial and private equity industry in Continental Europe may require providing own workforce with market-competitive remuneration packages to ensure talent attraction and retention. The inability of GBL to provide such market-competitive remuneration packages may impede its ability to properly execute its strategy. GBL's Remuneration policy is addressing this risk.

A competitive incentive scheme - structured around a short-term incentive plan ("STIP"), a long-term incentive plan ("LTIP") and a carry plan - plays a key role in the ability of GBL to mitigate the risk related to "adequate wage". Every employee within GBL's own workforce can benefit from the STIP and the LTIP implemented by GBL while the carry plan may be restricted to selected individuals. STIP program is executed under a 12-month time horizon. LTIP program is structured on a 10-year time horizon with a vesting period of 3 to 4 years. Carry plan typically retains a 10-year time horizon. GBL is tracking on a yearly basis remuneration trends in the financial and private equity industry in Continental Europe to ensure that the different incentive schemes offered are effective. Please refer to §2.2 Remuneration Policy, page 22.

Through the DMA process, GBL identified "Philanthropy" as an entity-specific sub-sub-topic associated with positive actual material impact over a medium-term horizon. Carried out under the GBL ACT initiative and related to GBL's own operations, GBL's philanthropic activities are conducted under a truly philanthropic philosophy and approach aiming for a local positive impact across well-defined areas of intervention like education, healthcare, environmental protection or, social justice. Beyond the positive local contribution to the environment and the society, GBL ACT supports employee's motivation and retention. Please refer to §7.2.5 Entity specific - Philanthropy, page 46.

Considering the nature of GBL's activity, no CapEx is involved in the implementation of own workforce related action plans (current or future resources). OpEx-related spending for the own workforce action plans covers training expenses, total compensation as well as the cost of the carry plan. In FY2024, own workforce action plans' OpEx related-spending amounted to EUR 62.9 million. Please refer to Note

5.2 Consolidated financial statements 'Details of employees expenses'. GBL expects the OpEx related amounts to remain stable in the short term horizon.

The management of GBL's material IROs related to its own workforce is an integral part of the overall risk management process. Please refer to Risk management chapter of the Annual Report (§3.2.3 Risks specific to GBL, page 64).

## 7.2.3.7 Tracking effectiveness of policies and actions through targets

GBL's Board of Directors with the support from the Governance and Sustainable Development Committee reviews and approves the targets related to the own workforce. GBL has no workforce representative, noting that for the purposes of GBL's DMA process an employees' representative was specifically appointed who participated in the IRO identification process. GBL's own workforce was neither engaged in setting targets nor engaged in tracking performance against the targets. Yearly achievements are communicated by GBL's management representatives on a regular basis offering an opportunity for own workforce to discuss potential lessons or improvements.

### 7.2.3.7.1 Own workforce - Target #1

GBL retains the target to maintain 100% coverage of its own workforce by an annual review (scope:  holding segment; period: FY2024-FY2030; baseline year FY2023; baseline value: 100%; coverage calculated as the number of employees in GBL's own workforce who benefited from an annual review divided by the total number of employees in GBL's own workforce). In FY2024, 100% of GBL's own workforce benefited from an annual review.

### 7.2.3.7.2 Own workforce - Target #2

GBL retains the target to maintain a reasonable level of employee turnover over the period FY2024-FY2030. Own workforce's target #2 scope is defined as own workforce of the holding segment. Over the 5 years spanning FY2019-FY2023, GBL's employee turnover stood on average at 9.6% (baseline 5Y: 9.6%; baseline value: 9.6%). The turnover is calculated based on the number of permanent employees leaving the company during the year (voluntarily leave, dismissal, retirement or death in service) divided by the average number of permanent employees during the year. Considering the concentration of GBL's own workforce and the specific characteristics of some of the positions held at GBL, GBL is assessing this target and its reasonable achievement on a qualitative, line by line basis. In FY2024, GBL's employee turnover (holding segment scope) was 17.4%.

### 7.2.3.7.3 Own workforce - Target #3

GBL retains the target to maintain an employee engagement score above 65% over the period FY2024-FY2030. Own workforce's target #3 scope is defined as own workforce of the holding segment. In FY2023 (baseline year), GBL's employee engagement score was 69%. In FY2024, GBL's employee engagement score was 75%.

## 7.2.3.8 Characteristics of employees

All employees' data reported are reported in headcount as at the end of the reporting period except where explicitly mentioned.

The table below summarizes GBL's workforce characteristics.

| Workforce | FY2022 | FY2023 | FY2024 |
|---|---|---|---|
| Number of employees | 72 | 80 | 83 |
| Number of employees (Men) | 40 | 48 | 50 |
| Number of employees (Women) | 32 | 32 | 33 |
| Number of employees (Other) | / | / | / |
| Number of employees (Not reported) | / | / | / |
| Number of employees (average) | 63.0 | 76.0 | 81.5 |
| Number of FTEs | 62.7 | 78.3 | 81.3 |
| Number of FTEs (average) | 58.4 | 70.5 | 79.8 |
| **Geography breakdown** | **FY2022** | **FY2023** | **FY2024** |
| Belgium | 51 | 52 | 54 |
| Rest of EEA | 11 | 10 | 24 |
| UK | 2 | 6 | 5 |
| *Total* | *72* | *80* | *83* |
| **Positions** | **FY2022** | **FY2023** | **FY2024** |
| C-level | 4 | 3 | 3 |
| Non-executive | 32 | 37 | 33 |
| Workforce | 36 | 40 | 47 |
| *Total* | 72 | 80 | 83 |
| C-level | 6% | 4% | 4% |
| Non-executive | 44% | 46% | 40% |
| Workforce | 50% | 50% | 56% |
| **Non-employees** | **FY2022** | **FY2023** | **FY2024** |
| Number of non-employees in the workforce | 1 | 3 | 5 |
| Self-employed people | 1 | 3 | 4 |
| Interim | 0 | 0 | 1 |
| **Non-guaranteed hours employees** | **FY2022** | **FY2023** | **FY2024** |
| Non-guaranteed hours employees | / | / | / |
| Non-guaranteed hours employees – Men | / | / | / |
| Non-guaranteed hours employees – Women | / | / | / |
| Non-guaranteed hours employees – Other | / | / | / |
| Non-guaranteed hours employees – Not reported | / | / | / |
| **Turnover** | **FY2022** | **FY2023** | **FY2024** |
| Number of employees who left during the year | 5 | 6 | 13 |
| Employee turnover (number of employees who left during the year / average number of employees in own workforce during the year) | 8.3% | 8.3% | 17.4% |

Table 17 – Workforce characteristics

As an investment holding company, GBL predominantly employs investment professionals or professionals in support functions (finance, legal, communication, HR, ESG, IT). For GBL, non-employees are professionals with contracts with the undertaking to supply labor or people provided by undertakings primarily engaged in employment activities (NACE code N78). For GBL, non-employees typically cover independent employees like advisors (e.g. IT/AI, investment) or employees working for GBL under an interim contract.

Due to the size of GBL's operations and the specificities of the tasks and roles conducted by non-employees at GBL, the non-employee number is not an estimated number but an exact number. Note that due to the specificities of Belgium regulation, the CEO has an independent status but considering the role and full dedication to GBL, the CEO position is accounted for under GBL's employee headcount.

For GBL, "top management" (or "C-level") refers to executive management position and includes executive and senior level officials who plan, direct, and formulate policies, set strategy, and provide the overall direction for the development of the company within the parameters approved by the Board of Directors and other governing bodies. Residing in the highest levels of the organization, these executives plan, direct and coordinate activities with the support of subordinate executive and staff managers. At GBL, three positions are qualified as "top management": the Chief Executive Officer position, the Chief Financial Officer position, and the General Secretary and Chief Operating Officer position.

## 7.2.3.9 Collective bargaining coverage and social dialogue

The table below summarizes GBL's own workforce coverage by collective bargaining agreements.

| | FY2022 | FY2023 | FY2024 |
|---|---|---|---|
| Percentage of employees covered by collective bargaining agreements | 100% | 100% | 100% |

Table 18 – Collective bargaining agreements' coverage

GBL's own workforce is covered in full by a collective bargaining agreement. Due to the size of GBL and the lack of employee representative, there is no agreement with employees for representation by European Works Council (EWC), Societas Europaea (SE) Works Council, or Societas Cooperativa Europaea (SCE) Works Council.

## 7.2.3.10 Diversity metrics

The table below summarizes GBL's workforce diversity and employment contract characteristics.

| Breakdown by gender and contract type | | FY2022 | FY2023 | FY2024 |
|---|---|---|---|---|
| Men | Permanent | 39 | 44 | 44 |
| | Temporary | 1 | 4 | 6 |
| Women | Permanent | 30 | 31 | 29 |
| | Temporary | 2 | 1 | 4 |
| Men | Permanent | 54% | 55% | 53% |
| | Temporary | 1% | 5% | 7% |
| Women | Permanent | 42% | 39% | 35% |
| | Temporary | 3% | 1% | 5% |

Table 19 – Workforce diversity and employment characteristics

The table below summarizes GBL's senior management (C-level) gender distribution.

| C-level | FY2022 | FY2023 | FY2024 |
|---|---|---|---|
| Men | 3 | 2 | 2 |
| Women | 1 | 1 | 1 |
| Total | 4 | 3 | 3 |
| Men | 75% | 67% | 67% |
| Women | 25% | 33% | 33% |

Table 20 – Gender distribution – C-level

The table below summarizes GBL's workforce age distribution.

| Employees' age distribution | FY2022 | FY2023 | FY2024 |
|---|---|---|---|
| Below 30 years old | 12 | 19 | 21 |
| 30 years old to 50 years old | 43 | 43 | 45 |
| Above 50 years old | 17 | 18 | 17 |
| Below 30 years old | 17% | 24% | 25% |
| 30 years old to 50 years old | 60% | 54% | 54% |
| Above 50 years old | 23% | 22% | 21% |

Table 21 – Age distribution

## 7.2.3.11 Adequate wages

The table below summarizes GBL's adequate wage-related metrics.

| Adequate wages | FY2024 |
|---|---|
| Percentage of own employees paid above or a minimal local mandatory salary | 100% |
| Percentage of non-employees paid above or a minimal local mandatory salary | 100% |

Table 22 – Adequate wage

## 7.2.3.12 Social protection

The table below summarizes GBL's own workforce coverage by social protection.

| Social protection | FY2022 | FY2023 | FY2024 |
|---|---|---|---|
| Percentage of employees covered by social protection | 100% | 100% | 100% |

Table 23 – Social protection coverage

All employees in GBL's own workforce are covered by social protection through public programs or GBL's benefits offered against: (i) loss of income due to sickness; (ii) loss of income due to unemployment starting from when the relevant own worker is working for GBL; (iii) loss of income due to employment injury and acquired disability; (iv) loss of income due to parental leave; (v) loss of income due to retirement. GBL is not operating in countries where employees do not have social protection with regard to one or more of the types of events mentioned before.

## 7.2.3.13 Training and skills development metrics

The table below summarizes GBL's own workforce participation in performance review.

| Performance review | FY2024 |
|---|---|
| Own employees participation in performance review | 100% |
| Own employees participation in performance review – Men | 100% |
| Own employees participation in performance review – Women | 100% |

Table 24 – Performance review

As disclosed above (please refer to §7.2.3.6 Actions and resources in relation to own workforce, page 37), employees benefit from an annual and a semi-annual review meeting (i.e. 2 meetings per year). 100% of the meetings planned in 2024 have been held.

The table below summarizes GBL's own workforce training and skills development efforts.

| Training | FY2024 |
|---|---|
| Average number of training hours – Own employees | 9.4 |
| Average number of training hours – Men | 7.4 |
| Average number of training hours – Women | 12.6 |

Table 25 – Training efforts

### 7.2.3.14 Health and safety

The table below summarizes GBL's workforce health and safety metrics.

| Health and safety | FY2024 |
|---|---|
| Number of fatalities in own workforce | 0 |
| Number of fatalities in other workers working on the undertaking sites | 0 |
| Number of accidents in own workforce | 0 |
| Rate of recordable work-related accidents | 0 |
| Number of recordable work-related ill health of employees | 0 |
| Number of days lost to work-related injuries, fatalities, work-related ill health | 0 |

Table 26 – Health and safety

All employees at GBL are covered by the Work Regulation which covers accidents when on the way to work. However, there are no formal H&S management systems in place, given this is not applicable to the sector in which GBL operates as the nature of the work typically involves lower physical risk compared to heavier industries.

### 7.2.3.15 Work-life balance

All GBL's employees are entitled to family-related leave through social policy and collective bargaining agreements.

| Work-life balance | FY2024 |
|---|---|
| Percentage of employees entitled to take family-related leave | 100% |
| Percentage of entitled employees that took family-related leave | Not relevant |
| Percentage of entitled employees that took family-related leave – Men | Not relevant |
| Percentage of entitled employees that took family-related leave – Women | Not relevant |

Table 27 – Family-related leave

In FY2024, none of GBL's employees have been in a position to take family-related leave (no birth or similar qualifying event).

### 7.2.3.16 Compensation metrics (pay gap and total compensation)

The table below summarizes GBL's own workforce compensation metrics.

In accordance with ESRS S1 §97, gender pay gap is defined as the difference in average gross annual salary between female and male employees for employees in the company as of Dec. 31st 2024. Pay data exclude interns as well as GBL Capital's employees, highest and lowest paid employees were removed from the data series.

Please note that the generic "Gender pay gap (all employees)" metric may be heavily distorted and subject to statistical challenges due to (i) a very concentrated workforce (ii) the nature of the private equity industry and associated remuneration schemes offered by GBL to attract and to retain key persons; and (iii) the positions not being doubled and therefore not supporting comparability.

In accordance with ESRS S1 §98, the generic "Gender pay gap (all employees)" metric is therefore completed by gender pay gap metrics for specific relevant and more homogenous groups within GBL's own workforce: (i) C-level and non-executive level; and (ii) workforce level.

| Compensation | FY2024 |
|---|---|
| Gender pay gap (all employees) | 41% |
| Gender pay gap (C-level & Non-executive level) | 12% |
| Gender pay gap (workforce level) | 12% |
| Annual total remuneration ratio | 13.7 |

Table 28 – Compensation

## 7.2.3.17 Incidents, complaints and severe human rights impacts

No work-related incident of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant form of discrimination involving internal and/or external stakeholders across GBL's own operations in the reporting period, including incidents of harassment as a specific form of discrimination, has been recorded in FY2024 (incident of discrimination, work-related grievances, incident and complaints related to social and human rights matters as reported under Whistleblowing Procedure or through any other legal channels).

Over the reporting period, (i) no severe human rights issues and incidents connected to own workforce have been recorded; (ii) no material fines, penalties and compensation for severe human rights issues and incidents connected to own workforce have been imposed; and (iii) no material fines, penalties and compensation for damages as result of violations regarding social and human rights factors have been recorded.

# 7.2.4 Governance information - ESRS G1 - Business conduct

## 7.2.4.1 Ethical conduct oversight

GBL's Board of Directors oversees IRO-related strategic orientations, policies, projects, resources, performance, reporting and related processes including but not limited to business conduct.

The Governance and Sustainable Development Committee reviews and assesses IROs related to GBL acting in its capacity as a "responsible company" on an on-going basis (see Part I of the sustainability statement). Conclusions from each Governance and Sustainable Development Committee meeting are reported to the Board of Directors by its Chairwoman.

In application of the ESG integration approach, the Audit Committee reviews and assesses on a yearly basis the risks inherent to GBL acting as a "responsible investor", including an IRO-specific risk assessment performed as part of the portfolio monitoring process (please refer to §7.3.1 Entity specific - ESG integration, page 47). The assessment of the portfolio participation's business conduct practices is a default item in this risk assessment.

In accordance with the CSRD requirements as implemented into Belgian law, the tasks of the Audit Committee have been extended in 2024 to monitor sustainability reporting including: (i) informing the Board of Directors about the outcome of the assurance of sustainability reporting, and how the assurance contributed to the integrity of sustainability reporting, including what the role was of the Audit Committee in the process; (ii) monitoring the sustainability reporting process; (iii) monitoring the internal control and risk management systems with regards to sustainability reporting; (iv) monitoring the assurance of sustainability reporting; and (v) monitoring the independence of the independent assurance services provider. The Audit Committee has been carrying out these tasks on an ongoing basis through the year 2024. Conclusions from each Audit Committee meeting are reported to the Board of Directors by its Chairwoman.

The CEO is responsible for the oversight of GBL's business conduct and the direct responsibility for business conduct has been delegated to the Corporate Secretary and Chief Legal Officer. GBL believes however that, in addition to giving the tone at the top, an effective corporate culture requires widespread workforce engagement to ensure alignment with GBL's strategy. All corporate functions are therefore involved, primarily: (i) the investment team in charge of deploying GBL's ESG integration approach as a "responsible investor" at each stage of the investment cycle; (ii) the Chief Financial Officer in charge of GBL's overall risk framework; (iii) the legal and human resources departments in charge of social and governance matters; (iv) the Head of ESG in charge of environmental matters and; (v) the Head of Communication in charge of internal and external communication.

Please refer to the Corporate Governance chapter of the Annual Report (§2.2 Board of Directors and Committees, page 9).

## 7.2.4.2 Material impacts, risks and opportunities relating to business conduct

Corporate culture expresses goals through shared values and beliefs. It guides GBL's activities through shared assumptions and norms such as values or mission statements. For GBL, "*Corporate culture*" sub-topic is a positive actual material impact over a long-term time horizon. Considering GBL's family ownership and control, GBL's set of values and corporate culture detailed in the Code of Conduct and Ethics (the "Code") are an important factor contributing to own workforce motivation and retention. Similarly, "*Corporate culture*" sub-topic is also a risk over a long-term time horizon for GBL. The inability of GBL to ensure a strict adherence to GBL's values and the different codes, policies and processes driving GBL investment and day-to-day activities may impact GBL's reputation and reliability. GBL's values and the Code address this risk.

GBL's Code defines the values and principles that govern the management of its activities and are established as rules of good conduct. Through the Code and the updates to the Code, the management demonstrates its role as custodian of GBL's ethical values. It intends to play a key role in spreading a strong corporate culture at every level, thus encouraging coordination between the Group's various business areas.

The Code is distributed to GBL's workforce and can be accessed on GBL's website. Cooperation and involvement of all employees is expected in order to ensure compliance with the Code either directly by exemplary behavior or indirectly by approaching the Compliance Officer or by reporting any breach confidentially through the Whistleblowing Procedure.

Under the Whistleblowing Procedure detailed in the Code, all employees may exercise their right to securely report an actual or potential violation of the Code or any other violation covered by the procedure. Reporting via the scheme by approaching the Compliance Officer is confidential and the employee, when acting in good faith and in compliance with the rules of the Whistleblowing Procedure, shall not be subject to reprisal. GBL is committed to investigating any business conduct incident promptly, independently and objectively.

As an investment holding company, GBL is committed to safeguarding the integrity and transparency of markets by combating any form of market abuse (insider dealing, dissemination of false information and price manipulation) concerning GBL securities or those of its subsidiaries. To that end, GBL's Board of Directors has issued a set of rules compiled in the Dealing Code in order to set the policy on the prevention of market abuse, as defined by the Market Abuse Regulation (EU) 596/2014 of the European Parliament and of the Council and its European and Belgian implementing provisions. The Dealing Code is part of the Charter and can be accessed on GBL's website. Particular attention must be paid to "Relevant Persons" as defined in the Dealing Code regarding compliance with these obligations. As a matter of fact, GBL prioritizes compliance with the principle of equal information between investors. Failure to comply with this principle would expose GBL and all its employees to disciplinary, civil and criminal penalties.

Integrity in conducting business is established as a fundamental value within GBL both with regard to the trust of its stakeholders and vis-à-vis legal risks that may result from the commission of corruption or other related offences. GBL recognizes corruption and influence peddling as an obstacle to free competition and the economic development of our companies. GBL adopts a zero tolerance approach to any actions by its employees that may be linked in one way or another to acts of corruption or political influence.

GBL intends to solely exercise its investment purpose and not to jeopardize it with any direct or indirect involvement in policy, law and regulation development or lobbying activities. Under the Code, GBL does not make any political contributions and is not involved in any lobbying activity as this would jeopardize its independence and ability to exercise its investment activity characterized by a long term investment horizon.

GBL undertakes to ensure that its own workforce is trained in the Code and the Dealing Code so that all the employees adopt best practices in the context of their activities. GBL is particularly committed to raising awareness among its workforce of GBL's anti-corruption and business conduct values and practices. Yearly training courses are organized for its workforce to (i) raise their awareness of GBL's corporate values and related business conduct practices and (ii) require them to comply with these policies and procedures. In FY2024, training efforts focused on market abuse and portfolio compliance.

GBL retained the target of having 100% of its own workforce trained on the Code on an annual basis over the period FY2025-FY2030. In FY2024, 100% of its own employees have been trained on the Code.

Considering the nature of GBL's activities, there is no CapEx involved to support the actions mentioned above. OpEx supporting the business conduct-related action plan cover the services related to the administration of the annual compliance questionnaire. It amounted to EUR 35,214 in FY2024.

GBL expects future financial resources allocated to business conduct-related actions to remain stable versus FY2024.

The Code and its implementation are evaluated by GBL's Governance and Sustainable Development Committee and GBL's Board of Directors on an annual basis.

### 7.2.4.3 Business conduct metrics

The table below summarizes GBL's business conduct-related metrics.

| Business conduct metrics | FY2024 |
|---|---|
| Percentage of functions-at-risk covered by training programs | 100% |
| Number of convictions for violation of anti-corruption or anti-bribery laws | 0 |
| Amount of fines for violation of anti-corruption or anti-bribery laws (in EUR) | 0 |
| Number of confirmed incident of corruption or bribery | 0 |
| Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents | 0 |
| Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery | 0 |

Table 29 – Business conduct

## 7.2.5 Entity specific - Philanthropy

### 7.2.5.1 Philanthropy activities' oversight

GBL's Board of Directors oversees IRO-related strategic orientations, policies, projects, resources, performance, reporting and related processes including but not limited to philanthropic activities.

GBL's Philanthropy Committee is responsible for the oversight and direct responsibility of GBL's philanthropic activities. GBL's Philanthropy Committee includes Board of Directors representatives, GBL's Corporate Secretary and Chief Legal Officer, GBL's Head of Communication, GBL's Head of ESG, GBL's employees and benefits from the support from external advisors.

GBL's Philanthropy Committee's activities are reported to GBL's Board of Directors on a yearly basis.

### 7.2.5.2 Philanthropy material impacts, risks and opportunities

Through the DMA process, GBL identified "Philanthropy" as an entity-specific sub-sub-topic associated with positive actual material impact over a medium-term horizon. Carried out under the GBL ACT initiative and related to GBL's own operations, GBL's philanthropic activities are conducted under a truly philanthropic philosophy and approach aiming for a local positive impact across well-defined areas of intervention like education, healthcare, environmental protection or, social justice. Beyond the positive local contribution to the environment and the society, GBL ACT supports employee's motivation and retention.

### 7.2.5.3 Philanthropy policy

Giving meaning to growth and paying it forward are a key parts of GBL's DNA and approach to philanthropy. These values also underpin GBL's commitment to civil society and guide its sponsorship and philanthropic decisions.

By actively accompanying and supporting a number of projects in the fields of education, healthcare & scientific research, social impact and the environment, GBL seeks to make an impact and help build a better world for future generations.

GBL's philanthropy policy is organized around four main themes, which determine both the choice of projects and how GBL supports them.

(i) Local impact: most of the projects GBL supports are Belgian and have a positive effect on the local society and everyone that lives here;

(ii) Concrete action: GBL's aim is not to interfere in how the projects are run. GBL supports them financially and helps them achieve their goals. GBL is, however, thrilled to participate and witness these good works in action when possible;

(iii) Long term commitment: similar to its investment approach, GBL favors a multi-generational perspective in the selection of projects. While GBL knows the importance of making an immediate impact, we prioritize sustainable projects with a long-term vision;

(iv) Agile, coherent and responsible management: when GBL makes a commitment, GBL will be fully involved, resolutely, at all times, and by promoting direct contact, exchange and proximity.

### 7.2.5.4 GBL ACT programs

Considering the policy guidelines described above, GBL ACT programs are implemented along the four key areas of interventions retained under the Philanthropy Policy: (i) education, (ii) healthcare and scientific research, (iii) social impact, and (iv) the environment. In order to contribute to GBL's employee motivation and engagement, GBL ACT programs are managed by dedicated internal teams leveraging on their strong commitment and willingness to have an impact.

GBL's Philanthropy Committee meets on a quarterly basis to monitor existing projects as well as to review and decide on potential new projects.

### 7.2.5.5 GBL's philanthropy metrics

The table below summarizes GBL's philanthropy metrics.

| GBL ACT | FY2024[1] |
|---|---|
| Total contribution (in EUR million) | 2.45 |
| **Number of supported projects** | **40** |

Table 30 – Philanthropy metrics

The amount of financial resources allocated to GBL ACT is expected to remain stable in the near future.

1 Unless stated otherwise, FY2024 metrics reported in this table have not been validated by an external body other than the assurance provided

# 7.3 PART II – GBL consolidated

## 7.3.1 Entity specific – ESG integration

### 7.3.1.1 ESG integration definition

As a long-term investor, understanding material sustainability IROs leads GBL to seek to reduce risks, to capture opportunities in portfolio management and to enhance GBL's investment performance over the long term. GBL therefore believes that ESG integration defined as the integration of material sustainability IROs into the investment analysis and management of its participations supports better risk-adjusted returns for its portfolio.

### 7.3.1.2 ESG integration responsibilities

GBL's Board of Directors is in charge of the oversight of ESG integration-related strategic orientations, policies, projects, resources, performance, reporting and related processes. The Audit Committee reviews and assesses on a yearly basis the IRO-specific risk assessment performed as part of the portfolio monitoring process. The CEO is responsible for the implementation of the ESG integration approach and the direct responsibility for IROs matters has been delegated to the Head of ESG. GBL believes however that, in addition to giving the tone at the top, proper ESG integration requires widespread workforce engagement, as corporate culture is key to ensure alignment with GBL's strategy. All corporate functions are therefore involved, primarily: (i) the investment team in charge of deploying GBL's ESG integration approach as a "responsible investor" at each stage of the investment cycle; (ii) the Chief Financial Officer in charge of GBL's overall risk framework; (iii) the General Secretary and the legal and human resources departments in charge of social and governance matters at the GBL level; and (iv) the Head of Communication in charge of internal and external communication.

### 7.3.1.3 ESG integration impacts, risks and opportunities

Through the DMA process, GBL identified "ESG integration" entity-specific topic as an actual positive material impact over a short to medium-term horizon and as a risk over a long-term horizon. ESG integration, defined by the Principles for Responsible Investment as "the explicit and systematic inclusion of ESG issues in investment analysis and investment decision", generates positive impact on GBL's portfolio participations' sustainability journeys and achievements via a systematic engagement on material IROs at Board level and with the relevant senior management representatives of portfolio's participations. The inability of GBL to enforce a proper integration of ESG factors in the pre-investment cycle (exclusion policy, ESG proprietary rating, ESG due diligence) and post investment cycle (ESG strategic plan, ESG engagement, sustainable IRO monitoring, stewardship, exit) may affect GBL's reputation and the performance of its investment activities. GBL's ESG Policy addresses this risk and details the strategy, governance, policy and processes for integrating ESG considerations into GBL's core business.

### 7.3.1.4 ESG Policy

GBL's ESG Policy reflects the core values that guide GBL on environmental, social and governance issues and their integration in investment activities. It presents the commitments and implementation guidelines for GBL. It addresses the management of material IROs related to ESG integration and covers ESG integration requirements in pre- and post-investment phases.

The ESG Policy's scope of application ("ESG scope") applies to GBL and its direct and indirect wholly-owned subsidiaries ("GBL as a responsible company"). The companies within GBL's portfolio are included in the ESG scope under the "GBL as a responsible investor" approach in line with the Part II of GBL's sustainability statement (please refer to §7.3 Part II – GBL consolidated). Those companies identify and address their sustainable IROs within the framework of their own internal controls and governance.

GBL's ESG Policy has been reviewed and approved by GBL's Board of Directors. The CEO is responsible for the oversight of the ESG Policy implementation (including but not restricted to its ESG integration component) and he is supported in that matter by the Head of ESG and the Investment Partners. GBL's Board of Directors is assessing the ESG Policy implementation on a yearly basis.

The ESG Policy is publicly available on GBL's website.

## 7.3.1.5 ESG integration process

Paramount to its asset owner positioning, GBL seeks to build core shareholding positions with adequate governance. The potential to become a reference shareholder and exercise influence, the potential to gain board representation and the ability to leverage a strong management team are clear and undisputed investment criteria for GBL that support directly its ability to work on material sustainable IROs in a unique way alongside its portfolio of participations. ESG integration therefore aims at identifying for each portfolio company sustainability IROs and, if assessed as material: (i) translating them into potential adjustments to the investment theses; (ii) reporting them to GBL's Audit Committee and ultimately to GBL's Board of Directors; and (iii) ensuring their monitoring by GBL's representatives through the governance bodies of the portfolio companies.

GBL's ESG integration process is systematically applied, independently of the ownership characteristics of the potential transaction and/or investment (e.g., controlled or non-controlled position).

Considering the nature of its core business and its long-term investment horizon, GBL's ESG integration process encompasses all of the following key steps in the investment process: (i) investment universe definition; (ii) pre-investment phase due diligence; (iii) post-investment ESG integration and ongoing portfolio monitoring; (iv) voting and stewardship and; and (v) exit decision.

GBL's ESG integration process is reviewed on an ongoing basis. In 2024, GBL's ESG integration process has been adapted to integrate CSRD/ESRS requirements.

## 7.3.1.6 Pre-investment phase material sustainable IROs identification

During the pre-investment phase, potential investments are screened using a three-step process: (i) compliance with GBL's Exclusion policy; (ii) assessment of IRO's exposure leveraging on GBL Proprietary ESG rating framework; and (iii) confirmation of IROs' exposure via in-depth due diligence and sustainable IRO assessment.

### 7.3.1.6.1 GBL Exclusion Policy

The initial step consists of assessing and, if appropriate, excluding potential investments in accordance with GBL's Exclusion Policy. The following criteria are considered (please refer to GBL's ESG Policy available on GBL's website for the full details of GBL's Exclusion Policy):

(i) *Controversial behavior and legally-required exclusions:* as a signatory of the UNGC, and recognizing the provisions included in the United Nations Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises, GBL will assess the behavior of organizations in accordance with these frameworks and exclude investments in organizations involved in severe breaches of these principles;

(ii) *Controversial weapons:* GBL excludes investments in organizations directly involved in the development, production, maintenance and trading of controversial weapons;

(iii) *Pornography:* GBL does not wish to be associated with any business where human rights are violated. GBL excludes direct investments in organizations involved in the pornography, prostitution and sex industries;

(iv) *Tobacco:* considering public health concerns associated with tobacco, but also human rights abuses, poverty impact, environmental consequences and the substantial economic cost associated with tobacco, GBL excludes direct investments in organizations involved in the production, supply and sale of tobacco products;

(v) *Fossil fuels:* as coal is the biggest contributor to climate change derived from human activity, GBL excludes direct investments (a) in organizations involved in the development of new thermal coal capacities in mining, production, utilities or transportation infrastructure; and (b) in organizations deriving more than 25% of their revenues in thermal coal transportation or thermal power generation without a climate strategy in line with the Paris Agreement. Considering the environmental damages, social cost and carbon profile associated with non-conventional oil and gas exploration and production and in particular oil sands, GBL excludes investments in organizations deriving more than 5% of their revenues from exploration and production, trading, storage or transportation of non-conventional oil and gas products.

The compliance of the existing portfolio of participations with the GBL Exclusion Policy is reviewed on an annual basis.

### 7.3.1.6.2 ESG rating

GBL's proprietary ESG rating framework supports the early stage of ESG integration. It leverages automated ESG rating production methodology to validate the relevance of an investment opportunity and potential further resource allocation. It opens the path to constructive discussions internally and with the targeted companies in the second stage of the sustainable IRO assessment and due diligence process.

GBL's proprietary rating is structured around four dimensions to capture different insights offered by ESG analysis: (i) publicly-available external ESG ratings; (ii) trends in external ESG ratings publicly available: external ESG rating momentum (3Y change); (iii) ESG controversies: assessment of exposure to ESG controversies in absolute number and level of severity, potential red-flag identification; and (iv) ESG materiality (absolute and peer-group relative performance assessment based on industry-specific material ESG areas identified under SASB Materiality Map® General Issue Categories).

The GBL proprietary ESG rating gives direct access to key IROs and achievements in the most critical part of the ESG spectrum such as corporate governance, controversies, climate and social risks or SASB Materiality Map® General Issue Categories specific metrics. It provides the investment team with a proprietary ESG risk rating on a scale from AAA (highest rating) to CCC (lowest rating). Companies with an ESG rating from B to CCC are excluded from the investment universe.

The initial ESG risk assessment is produced in-house. ESG controversies potentially identified will play a key role in the definition of the scope of the in-depth due diligence and IRO assessment.

### 7.3.1.6.3 In-depth due diligence and IRO assessment

On the basis of the initial findings highlighted above, the CEO can make the decision to further allocate resources and to conduct an in-depth due diligence and IRO assessment on a potential investment. In-depth due diligence and IRO assessment therefore supports the identification and recognition of material sustainability IROs at the early stage of the investment process in reference to the ESRS. The scope of the due diligence and the nature of the work will be defined initially by using as starting point the list of the sustainability matters covered in topic ESRS in accordance with ESRS 1 AR.16. This is crossed checked with the source of information mentioned hereafter to identify and assess material IROs specific to the considered investment: (i) the results of GBL ESG proprietary rating framework; (ii) peer benchmarking review; (iii) potential DMA performed by the considered investment if available; and (iv) utilization of Equintel's AI DMA solution.

In the framework of the due diligence, this analysis is carried out internally by GBL's Investment team and GBL's Head of ESG with the potential support from third-party specialists. Consultation with affected stakeholders may be included depending on the nature of the business transaction considered.

The results of the in-depth due diligence and IRO assessment are integrated in the investment analysis, financial modelling and equity valuation process. The CEO submits to GBL's Board of Directors for decision the investment memo summarizing his recommendation and covering the material IRO assessment.

## 7.3.1.7 Post-investment ESG integration

### 7.3.1.7.1 Ongoing ESG engagement with portfolio companies

GBL has an engaged ownership approach in the companies in which it invests and ensures through direct engagement with their governance bodies (e.g. Board of Directors, Strategic Committee, Audit Committee, Nomination and Remuneration Committee or, Sustainability Committee) that they are managed in a manner consistent with its responsible management philosophy, including its Code and ESG Policy.

(i) **Listed assets:** in the case of publicly-listed assets, the findings of the ESG due diligence and IRO assessment support the initial engagement with the governance bodies and the management of the invested company on potential material sustainable IROs.

(ii) **Private assets:** in the case of privately-owned assets, the ESG due diligence findings are taken into account in developing the value creation action plan of the acquired entity. Particular attention is given to ESG responsibilities in the newly-acquired entities. As the ability of GBL's investment team to execute the action plan, including the ESG strategy, is paramount to the investment decision, GBL ensures that the ESG responsibilities are clearly defined at the Board of Directors level and across the organization in order to ensure successful implementation of the ESG component of the action plan.

(iii) **GBL Capital:** the ESG integration approach is following similar key steps aligned with GBL's ESG integration policy. GBL Capital's approach in the post investment phase remains highly dependent on GBL Capital's position in the transaction. For direct investments, GBL Capital's influence is exerted directly on the company, yet depends on GBL Capital's shareholding position (minority with or without a seat at the Board of Directors) while for co-investments or fund investments as a Limited Partner (LP), GBL Capital's involvement is exerted through the transaction's sponsor / General Partner (GP).

In the case of an incident arising at a portfolio company and being reported to GBL through its governance bodies, monitoring will be ensured by GBL's representative(s) within the relevant governance body, with the assistance of the relevant advisers. Any significant incident will be discussed, reviewed and monitored by the relevant reporting levels at GBL (including the CEO, Chief Legal Officer, Investment Partners and Head of ESG).

### 7.3.1.7.2 Periodic review of material sustainability IROs

In order to monitor appropriately its portfolio from an ESG perspective, GBL annually performs an in-depth IRO assessment of its portfolio companies. This assessment, the process of which is described in figure 01 below, has been structured by GBL to combine corporate and market information with proprietary data derived from: (i) in-house compliance questionnaire administered annually by GBL and prepared in accordance with ESRS 1 AR.16; (ii) conclusions of initial due diligence and IRO assessment and related action plan; (iii) DMA (if available); (iv) peer benchmarking review; (v) Equintel AI DMA solution; (vi) governance entities' packs (e.g., Board of Directors, Audit Committee, Nomination and Remuneration Committee, etc.); and (vii) knowledge and expertise of GBL's investment team on the portfolio companies and, more generally, their sectors.

| Stage 1 – Data collection | | |
|---|---|---|
| **Company data**<br><br>**Public information made available by the portfolio companies (annual reports, sustainability reports, CDP climate questionnaire, etc.)** | **Proprietary data**<br><br>In-house compliance questionnaire sent by GBL representative in the governance bodies to portfolio companies (the "compliance review"), SASB internal reporting, AI-based controversy monitoring tool (Equintel), Board / Audit Committee pack composition (e.g., DMA) | **Market data**<br><br>Statistics and analyses collected by GBL's external ESG expert (the "ESG Expert") on impacts related to the risks identified during the review of company and proprietary data |
| **Stage 2 - Initial IRO assessment** | | |
| **IRO exposure assessment** | **Impact on GBL assessment** | **Risk management assessment** |
| IROs exposure assessment framework calibration based ESRS and SASB frameworks, ESG reports, specific risks identified by Equintel AI based monitoring tool and DMA if available | Assessment by the ESG Expert of IROs' impacts on GBL based on the following impact categories: financial, compliance/legal, reputational, business-related | Risk management assessment performed by GBL and ESG Expert based on proprietary data (compliance review), ESG reports, market data |
| **Likelihood score** | **Inherent impact** | **Mitigation factor** |
| **Stage 3 – Adjusted IRO assessment** | | |
| | **Input from GBL's investment team**<br>Review and adjustments based on in-house knowledge of the portfolio companies and their sectors | |
| | **Adjusted inherent impact** | **Adjusted mitigation factor** |
| **Likelihood score** | **Residual impact score** | |
| **Sustainable IRO mapping**<br>For each portfolio company, mapping of material sustainable IROs (based on their probability of occurrence and impact assessment) | | |
| **Stage 4 – Reporting** | | |
| **GBL's Audit Committee**<br>Review of the sustainable IRO mapping by portfolio company | | |
| **GBL's Board of Directors**<br>Presentation of the key IROs in the context of the review of the ESG mid-term objectives | | |
| **Portfolio companies**<br>Key IROs to be monitored by GBL's representatives in the governance bodies of the portfolio companies | | |

Figure 01 – Sustainable IRO annual assessment process

This assessment aims at identifying for each portfolio company key sustainability IROs and, if assessed as material: (i) translating them into potential adjustments to the investment theses; (ii) reporting them to GBL's Audit Committee and ultimately to GBL's Board of Directors; and (iii) ensuring their monitoring by GBL's representatives through the governance bodies of the portfolio companies.

#### 7.3.1.7.3 Proxy voting

As a long-term professional shareholder, GBL believes that promoting good corporate governance standards, social responsibility and environmental stewardship is an essential part of its ownership responsibilities and GBL expects all its participations to comply with high corporate governance standards. Voting at the General Assembly is an integral part of this effort, and GBL intends to exercise the votes attached to all our investments. The analysis of the voting resolutions is carried out by the investment team considering the investment strategy for the portfolio company. Considering our influence on our portfolio companies due to the relative size of our shareholding and our involvement in the various governance entities, we have the ability to pre-emptively assess, amend, adjust and validate in advance the content of the resolutions submitted for vote, and we will support them.

GBL management intends to participate physically in the shareholder meetings. However, depending on the conditions, GBL may also exercise its vote by mail, procuration or any electronic format compliant with the local regulation and legal dispositions.

#### 7.3.1.7.4 Divestment

ESG risk analysis and the sustainable IRO annual assessment process is an integral part of the portfolio risk assessment approach described in the Chapter 3 (please refer to §3.2.3 Risks specific to GBL, page 64).

### 7.3.1.8 Training

GBL ensures an adequate level of training and competence-building efforts for the different functions involved in the implementation of its ESG Policy. Beyond the regular interaction with the Board of Directors on ESG topics as part of the CEO letter, a yearly ESG session is organized for the Board of Directors on ESG integration process outcome and achievements. GBL's executives and workforce benefit from periodic training sessions and presentations during their weekly meetings. In 2024, ESG integration related training focused on CSRD and its impact for the investment team.

### 7.3.1.9 Targets

GBL's Board of Directors with the support from the Audit Committee reviews and approves the targets related to ESG integration.

GBL retains the target to maintain 100% of GBL's NAV covered by ESG integration (period considered: FY2020-FY2030; baseline FY2020 at 100%). In FY2024, 100% of GBL's NAV was covered by ESG integration.

GBL also retains the target to ensure that 100% of GBL's portfolio is covered by the sustainable IROs assessment on a yearly basis (period considered: FY2020-FY2030; baseline FY2020 at 100%). In FY2024, 100% of GBL's portfolio benefited from the annual sustainable IROs review.

### 7.3.1.10 Financial resources allocated to ESG integration

Considering the nature of GBL's activities, mainly an office activity, no CapEx-related spending induced by ESG integration has been identified by GBL. OpEx-related spending for ESG integration at GBL covers the operating costs of its ESG department (salary costs, administrative support costs) as well as the costs of ESG-related services (e.g., ESG advisory services, ESG data, ESG memberships, ESG due diligence). In FY2024, ESG integration OpEx amounted to EUR 1.4 million.

### 7.3.1.11 Recognition

Beyond the non-financial information disclosure in regulatory filings and in its Annual Report, GBL is also disclosing its achievements in responsible investment under the PRI annual reporting process. In the last PRI assessment (2023 reporting cycle released in November 2024), GBL obtained 5-star ratings in every dimension rated: (i) 94/100 "Policy Governance and Strategy"; (ii) 100/100 "Indirect – Private equity", (iii) 100/100 "Direct – Listed equity – Active fundamental"; (iv) 100/100 "Direct – Private equity"; and (v) 100/100 "Confidence building measures".

## 7.3.1.12 Metrics

The table below summarizes GBL's ESG integration efforts and achievements.

| ESG integration | Metrics[1,2] | FY2024 |
|---|---|---|
| Coverage | Assets under management, by asset class, that integrate ESG issues, sustainability themed investing, and screening | 100% |
| Training | Regular ESG training session(s) organized for the investment team during the year | Yes |
| Pre-investment | Percentage of company's portfolio compliant with exclusion policy | 100% |
| | Percentage of new investments in private assets covered by GBL's ESG rating tool and ESG due diligence during the pre-investment phase | -[3] |
| | Percentage of new investments in listed assets covered by GBL's ESG rating tool and ESG due diligence during the pre-investment phase | -[4] |
| | Percentage of new investments in alternative assets covered by GBL Capital's ESG due diligence during the pre-investment phase | 100% |
| Post-investment | Percentage of portfolio companies covered by yearly IRO assessment | 100% |
| | Percentage of answers received form the portfolio companies with regards to the compliance questionnaire | 100% |
| | Percentage of ESG scope covered by a third party climate risk assessment (excl. SIM/GBL Capital) | 100% |
| | Percentage of GBL GHG emissions scope 3 cat. 15 'Investments' covered by climate physical and transition risk analysis (excl. SIM/GBL Capital) | 100% |

Table 31 – ESG integration metrics

1 Unless stated otherwise, FY2024 metrics reported in this table have not been validated by an external body other than the assurance provided
2 Percentage in the table refers to percentage of GBL's portfolio value
3 No new private investment
4 No new listed investment

## 7.3.2 CONTROLLED PARTICIPATIONS

### 7.3.2.1 General information

For GBL as a consolidated entity, the following list of ESRS 2 disclosure requirements have been incorporated by reference[1].

| Disclosure | ESRS 2 - General disclosures – Incorporation by reference | Page |
|---|---|---|
| *Basis for preparation* | | |
| BP-1 | General basis for preparation of the sustainability statement | page 4 |
| BP-2 | Disclosures in relation to specific circumstance | page 7 |
| BP-2 | Datapoints that derives from other legislations | - |
| *Governance* | | |
| GOV-1 | The role of the administrative, management and supervisory bodies | page 27 |
| GOV-2 | Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies | page 9<br>page 47 |
| GOV-3 | Integration of sustainability-related performance in incentive schemes | page 40 |
| GOV-4 | Statement on sustainability due diligence | page 9 |
| GOV-5 | Risk management and internal controls over sustainability reporting | page 64 |
| *Strategy* | | |
| SBM-1 | Strategy, business model and value chain | page 70<br>page 9<br>page 81 |
| SBM-2 | Interests and views of stakeholders | page 9<br>page 47 |
| SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | page 9<br>page 47<br>page 81 |
| *IRO* | | |
| IRO-1 | Description of the process to identify and assess material impacts, risks and opportunities | page 9<br>page 47 |
| IRO-2 | Disclosure requirements in ESRS covered by the undertaking's sustainability statement | - |

Table 32 – GBL consolidated entity - ESRS disclosure requirements – ESRS 2 incorporation by reference

### 7.3.2.2 Consolidated double materiality analysis

GBL's financial consolidated reporting perimeter is detailed in Chapter 6 of the Annual Report (please refer to §6.1.7 Scope of consolidation, associates and joint ventures and changes in group structure, page 160). It comprises mainly GBL (holding segment and GBL Capital), Imerys (listed asset), and Affidea, Sanoptis, Canyon, and Sienna Investment Managers (private assets).

These assets operate in fundamentally different industries from one another. Considering the provisions mentioned in ESRS 1 §56 & §103 and EFRAG IG 1 §189, GBL has therefore opted for a hybrid approach to ensure the completeness of the consolidated DMA process and subsequently the comprehensiveness of its sustainability statement and the transparency of its reporting.

GBL's ESG integration approach described above (please refer to §7.3.1 Entity specific – ESG integration, page 47) and in particular the periodic review process of material sustainable IROs supports the identification of potential material IROs at group consolidated level in a top down perspective.

Considering (i) the IROs identified as part of the annual IRO review process; (ii) the weight of each asset in GBL's overall portfolio; and (iii) the financial materiality threshold used by GBL as part of the monitoring of its portfolio (i.e. financial risk qualified as 'material' if financial impact on GBL's NAV beyond EUR 500 million), none of the risks identified reach a financial materiality status.

Considering (i) ESRS 1 Appendix B QC19 and EFRAG IG 1 §192; (ii) the fundamentally different nature of the industries GBL's participations operate in and their associated potential impacts; (iii) the lack of commonly shared topics / sub-topics / sub-sub-topics resulting from the analysis; and (iv) the lack of methodological ground to measure and to consolidate impacts that differ in nature in a meaningful way; GBL considers that apart for ESRS E1 sub-topic "climate change mitigation" (consolidated information related to GBL's overall portfolio emissions), ESRS S1 sub topic "own workforce" (consolidated information related to the number of employees), and ESRS G1 "corruption and bribery" (whistleblowing process in place), the consolidation of impacts for consolidated portfolio assets' under the top down approach

1 GBL holding is part of GBL as a consolidated entity. However, GBL holding's activities include overseeing governance, strategy, and IRO management. Therefore, these references are included as they are relevant to both GBL as a consolidated entity and GBL holding's governance, strategy, and IRO management.

is not supporting the production of meaningful and relevant information reflecting its intrinsic investment holding's portfolio management activities. Such consolidated information is presented hereafter.

In order to ensure the completeness of its consolidated DMA, and the comprehensiveness of its sustainability statement, and considering the provisions of ESRS 1 §103 and ESRS 1 Appendix B QC19 as well as its ESG integration approach (cf. §7.3.1 Entity-specific - ESG integration page 47), GBL has requested each consolidated asset to perform its own DMA.

The tables below provide an overview of the results of the DMA of each controlled participation of GBL.

| Impact materiality - Topics & sub-topics | GBL | Imerys | Affidea | Sanoptis | Canyon | SIM |
|---|---|---|---|---|---|---|
| **ESRS E1** | **X** | **X** | **X** | | **X** | **X** |
| Climate change adaptation | | X | X | | | X |
| Climate change mitigation | X | X | X | | X | |
| Energy | | | X | | | |
| **ESRS E2** | | **X** | | | | |
| Pollution of air | | X | | | | |
| Pollution of water | | X | | | | |
| **ESRS E3** | | **X** | | | | |
| Water | | X | | | | |
| **ESRS E4** | | **X** | | | **X** | |
| Direct impact drivers of biodiversity loss | | X | | | | |
| Impacts and dependencies on ecosystem services | | | | | X | |
| Impacts on the extent and condition of ecosystems | | X | | | | |
| Impacts on the state of species | | X | | | | |
| **ESRS E5** | | **X** | | | **X** | |
| Resource outflows related to products and services | | X | | | | |
| Resources inflows, including resource use | | X | | | X | |
| Waste | | | | | X | |
| **ESRS S1** | **X** | **X** | **X** | **X** | **X** | **X** |
| Equal treatment and opportunities for all | X | X | X | | | X |
| Other work-related rights | | X | X | | | X |
| Working conditions | | X | X | X | X | X |
| **ESRS S2** | | **X** | | | **X** | |
| Equal treatment and opportunities for all | | | | | X | |
| Other work-related rights | | | | | X | |
| Working conditions | | X | | | X | |
| **ESRS S3** | | **X** | | | | |
| Communities' civil and political rights | | X | | | | |
| Communities' economic, social and cultural rights | | X | | | | |
| Rights of indigenous peoples | | X | | | | |
| **ESRS S4** | | | **X** | **X** | **X** | |
| Information-related impacts for consumers and/or end-users | | | X | | X | |
| Personal safety of consumers and/or end-users | | | X | X | X | |
| Social inclusion of consumers and/or end-users | | | X | | | |
| **ESRS G1** | **X** | **X** | **X** | | **X** | |
| Corporate culture | X | X | X | | | |
| Corruption and bribery | | X | X | | | |
| Management of relationships with suppliers including payment practices | | X | | | | |
| Political engagement and lobbying activities | | X | | | | |
| Protection of whistle-blowers | | X | X | | X | |
| **Sector/entity specific topics** | **X** | | **X** | **X** | | |

| Impact materiality - Topics & sub-topics | GBL | Imerys | Affidea | Sanoptis | Canyon | SIM |
|---|---|---|---|---|---|---|
| Philantropy | X | | | | | |
| ESG Integration | X | | | | | X |
| Doctor's succession | | | | X | | |
| Regulation | | | X | | | |
| IT / Cyber security | | | X | | | |

Table 33 – DMA consolidated assets – Impact materiality

| Financial materiality - Topics & sub-topics | GBL | Imerys | Affidea | Sanoptis | Canyon | SIM |
|---|---|---|---|---|---|---|
| **ESRS E1** | | **X** | **X** | | **X** | **X** |
| Climate change adaptation | | X | X | | | X |
| Climate change mitigation | | X | X | | X | X |
| Energy | | | X | | | |
| **ESRS E2** | | **X** | | | | |
| Pollution of water | | X | | | | |
| **ESRS E3** | | | | | | |
| **ESRS E4** | | **X** | | | | |
| Direct impact drivers of biodiversity loss | | X | | | | |
| Impacts on the exent and condition of ecosystems | | X | | | | |
| Impacts on the state of species | | X | | | | |
| **ESRS E5** | | **X** | | | **X** | |
| Resource outflows related to products and services | | X | | | | |
| Resources inflows, including resource use | | X | | | X | |
| **ESRS S1** | **X** | | **X** | | | **X** |
| Equal treatment and opportunities for all | | | X | | | |
| Other work-related rights | | | X | | | X |
| Working conditions | X | | X | | | X |
| **ESRS S2** | | | | | | |
| **ESRS S3** | | | | | | |
| **ESRS S4** | | | **X** | | | **X** |
| Information-related impacts for consumers and/or end-users | | | X | | X | X |
| Personal safety of consumers and/or end-users | | | X | | X | |
| Social inclusion of consumers and/or end-users | | | X | | | X |
| **ESRS G1** | **X** | | | | | **X** |
| Corporate culture | X | | | | | X |
| Corruption and bribery | X | | | | | X |
| Protection of whistle-blowers | | | | | X | |
| Reporting on non-financial information | | | | | | X |
| IT (security & cyber-security) | | | X | | | X |
| **Sector/entity specific topics** | **X** | | | **X** | | **X** |
| ESG Integration | X | | | | | X |
| Doctor's succession | | | | X | | |
| AI | | | X | | | |
| Regulation | | | X | | | |

Table 34 – DMA consolidated assets – Financial materiality

Due to the heterogeneous activities of GBL's controlled participations, each sustainability matter identified as material at the level of the controlled participation in isolation but not at the level of the group is subsequently reported at the level of the relevant participation.

The sustainability statements of these controlled participations prepared on the basis of ESRS requirements are incorporated by reference in accordance with section 9.1 of ESRS 1 in the Appendix of this sustainability statement (please refer to §7.3.2.6 Controlled participations' sustainability statements, page 78).

### 7.3.2.2.1 List of data points derived from other EU legislations

As stated above, considering (i) ESRS 1 Appendix B QC19 and EFRAG IG 1 §192; (ii) the fundamentally different nature of the industries GBL's participations operate in and their associated potential impacts; (iii) the lack of commonly shared topics / sub-topics / sub-sub-topics resulting from the analysis; and (iv) the lack of methodological ground to measure and to consolidate impacts that differ in nature in a meaningful way; GBL considers that apart for ESRS E1 sub-topic "climate change mitigation" (consolidated information related to GBL's overall portfolio emissions), ESRS S1 sub topic "own workforce" (consolidated information related to the number of employees), and ESRS G1 "corruption and bribery" (whistleblowing process in place), the consolidation of impacts for consolidated portfolio assets' under the top down approach is not supporting the production of meaningful and relevant information reflecting its intrinsic investment holding's portfolio management activities. In that context, the table below summarizes the list of data points derived from other EU legislations.

| Disclosure requirement | Data point | Sustainability statement | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS 2 GOV-1 | 21 (d) | Board's gender diversity | Indicator number 13 of Table #1 of Annex 1 | | Commission Delegated Regulation (EU) 2020/1816 ( 27 ) , Annex II | | Not relevant |
| ESRS 2 GOV-1 | 21 (e) | Percentage of board members who are independent | | | Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |
| ESRS 2 GOV-4 | 30 | Statement on due diligence | Indicator number 10 Table #3 of Annex 1 | | | | Not relevant |
| ESRS 2 SBM-1 | 40 (d) i | Involvement in activities related to fossil fuel activities | Indicators number 4 Table #1 of Annex 1 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 ( 28 ) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk | Delegated Regulation (EU) 2020/1816, Annex II | | page 65 |
| ESRS 2 SBM-1 | 40 (d) ii | Involvement in activities related to chemical production | Indicator number 9 Table #2 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |
| ESRS 2 SBM-1 | 40 (d) iii | Involvement in activities related to controversial weapons | Indicator number 14 Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1818 ( 29 ) , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |
| ESRS 2 SBM-1 | 40 (d) iv | Involvement in activities related to cultivation and production of tobacco | | | Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |
| ESRS E1-1 | 14 | Transition plan to reach climate neutrality by 2050 | | | | Regulation (EU) 2021/1119, Article 2(1) | Not relevant |

| Disclosure requirement | Data point | Sustainability statement | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS E1-1 | 16 (g) | Undertakings excluded from Paris-aligned Benchmarks | | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2 | | Not relevant |
| ESRS E1-4 | 34 | GHG emission reduction targets | Indicator number 4 Table #2 of Annex 1 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 6 | | Not relevant |
| ESRS E1-5 | 38 | Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors ) | Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1 | | | | Not relevant |
| ESRS E1-5 | 37 | Energy consumption and mix | Indicator number 5 Table #1 of Annex 1 | | | | Not relevant |
| ESRS E1-5 | 40-43 | Energy intensity associated with activities in high climate impact sectors | Indicator number 6 Table #1 of Annex 1 | | | | Not relevant |
| ESRS E1-6 | 44 | Gross Scope 1, 2, 3 and Total GHG emissions | Indicators number 1 and 2 Table #1 of Annex 1 | Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1 | | page 65 |
| ESRS E1-6 | 53-55 | Gross GHG emissions intensity | Indicators number 3 Table #1 of Annex 1 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 8(1) | | page 65 |
| ESRS E1-7 | 56 | GHG removals and carbon credits | | | | Regulation (EU) 2021/1119, Article 2(1) | Not relevant |

| Disclosure requirement | Data point | Sustainability statement | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS E1-9 | 66 | Exposure of the benchmark portfolio to climate-related physical risk | | | Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |
| ESRS E1-9 | 66 (a); 66 (c) | Disaggregation of monetary amounts by acute and chronic physical risk; Location of significant assets at material physical risk | | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk. | | | Not relevant |
| ESRS E1-9 | 67 (c) | Breakdown of the carrying value of its real estate assets by energy-efficiency classes | | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral | | | Not material |
| ESRS E1-9 | 69 | Degree of exposure of the portfolio to climate-related opportunities | | | Delegated Regulation (EU) 2020/1818, Annex II | | Not relevant |
| ESRS E2-4 | 28 | Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil | Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1 | | | | Not material |
| ESRS E3-1 | 9 | Water and marine resources | Indicator number 7 Table #2 of Annex 1 | | | | Not relevant |
| ESRS E3-1 | 13 | Dedicated policy | Indicator number 8 Table 2 of Annex 1 | | | | Not relevant |
| ESRS E3-4 | 14 | Sustainable oceans and seas | Indicator number 12 Table #2 of Annex 1 | | | | Not relevant |

| Disclosure requirement | Data point | Sustainability statement | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS E3-4 | 28 c | Total water recycled and reused | Indicator number 6.2 Table #2 of Annex 1 | | | | Not relevant |
| ESRS E3-4 | 29 | Total water consumption in m³ per net revenue on own operations | Indicator number 6.1 Table #2 of Annex 1 | | | | Not relevant |
| ESRS 2 - IRO 1 -E4 | 16 (a) | | Indicator number 7 Table #1 of Annex 1 | | | | Not relevant |
| ESRS 2 - IRO 1 -E4 | 16 (b) | | Indicator number 10 Table #2 of Annex 1 | | | | Not relevant |
| ESRS 2 - IRO 1 -E4 | 16 (c) | | Indicator number 14 Table #2 of Annex 1 | | | | Not relevant |
| ESRS E4-2 | 24 (b) | Sustainable land / agriculture practices or policies | Indicator number 11 Table #2 of Annex 1 | | | | Not relevant |
| ESRS E4-2 | 24 (c) | Sustainable oceans / seas practices or policies | Indicator number 12 Table #2 of Annex 1 | | | | Not relevant |
| ESRS E4-2 | 24 (d) | Policies to address deforestation | Indicator number 15 Table #2 of Annex 1 | | | | Not relevant |
| ESRS E5-5 | 37 (d) | Non-recycled waste | Indicator number 13 Table #2 of Annex 1 | | | | Not relevant |
| ESRS E5-5 | 39 | Hazardous waste and radioactive waste | Indicator number 9 Table #1 of Annex 1 | | | | Not relevant |
| ESRS 2- SBM3 - S1 | 14 (f) | Risk of incidents of forced labour | Indicator number 13 Table #3 of Annex I | | | | Not relevant |
| ESRS 2- SBM3 - S1 | 14 (g) | Risk of incidents of child labour | Indicator number 12 Table #3 of Annex I | | | | Not relevant |
| ESRS S1-1 | 20 | Human rights policy commitments | Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I | | | | Not relevant |
| ESRS S1-1 | 21 | Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | | | Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |
| ESRS S1-1 | 22 | Processes and measures for preventing trafficking in human beings | Indicator number 11 Table #3 of Annex I | | | | Not relevant |

| Disclosure requirement | Data point | Sustainability statement | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS S1-1 | 23 | Workplace accident prevention policy or management system | Indicator number 1 Table #3 of Annex I | | | | Not relevant |
| ESRS S1-3 | 32 (c) | Grievance/complaints handling mechanisms | Indicator number 5 Table #3 of Annex I | | | | Not relevant |
| ESRS S1-14 | 88 (b) and (c) | Number of fatalities and number and rate of work-related accidents | Indicator number 2 Table #3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |
| ESRS S1-14 | 88 (e) | Number of days lost to injuries, accidents, fatalities or illness | Indicator number 3 Table #3 of Annex I | | | | Not relevant |
| ESRS S1-16 | 97 (a) | Unadjusted gender pay gap | Indicator number 12 Table #1 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |
| ESRS S1-16 | 97 (b) | Excessive CEO pay ratio | Indicator number 8 Table #3 of Annex I | | | | Not relevant |
| ESRS S1-17 | 103 (a) | Incidents of discrimination | Indicator number 7 Table #3 of Annex I | | | | Not relevant |
| ESRS S1-17 | 104 (a) | Non-respect of UNGPs on Business and Human Rights and OECD | Indicator number 10 Table #1 and Indicator number 14 Table #3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1) | | Not relevant |
| ESRS 2-SBM3-S2 | 11 (b) | Significant risk of child labour or forced labour in the value chain | Indicators number 12 and number 13 Table #3 of Annex I | | | | Not relevant |
| ESRS S2-1 | 17 | Human rights policy commitments | Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1 | | | | Not relevant |
| ESRS S2-1 | 18 | Policies related to value chain workers | Indicator number 11 and number 4 Table #3 of Annex 1 | | | | Not relevant |
| ESRS S2-1 | 19 | Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines | Indicator number 10 Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | Not relevant |
| ESRS S2-1 | 19 | Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | | | Delegated Regulation (EU) 2020/1816, Annex II | | Not relevant |

| Disclosure requirement | Data point | Sustainability statement | SFDR reference | Pillar 3 reference | Benchmark Regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS S2-4 | 36 | Human rights issues and incidents connected to its upstream and downstream value chain | Indicator number 14 Table #3 of Annex 1 | | | | Not relevant |
| ESRS S3-1 | 16 | Human rights policy commitments | Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1 | | | | Not relevant |
| ESRS S3-1 | 17 | Non-respect of UNGPs on Business and Human Rights, and OECD guidelines | Indicator number 10 Table #1 Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | Not relevant |
| ESRS S3-4 | 36 | Human rights issues and incidents | Indicator number 14 Table #3 of Annex 1 | | | | Not relevant |
| ESRS S4-1 | 16 | Policies related to consumers and end-users | Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1 | | | | Not relevant |
| ESRS S4-1 | 17 | Non-respect of UNGPs on Business and Human Rights and OECD guidelines | Indicator number 10 Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | Not relevant |
| ESRS S4-1 | 35 | Human rights issues and incidents | Indicator number 14 Table #3 of Annex 1 | | | | Not relevant |
| ESRS G1-1 | 10 (b) | United Nations Convention against Corruption | Indicator number 15 Table #3 of Annex 1 | | | | Not relevant |
| ESRS G1-1 | 10 (d) | Protection of whistle-blowers | Indicator number 6 Table #3 of Annex 1 | | | | page 37 |
| ESRS G1-4 | 24 (a) | Fines for violation of anti-corruption and anti-bribery laws | Indicator number 17 Table #3 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II) | | Not relevant |
| ESRS G1-4 | 24 (b) | Standards of anti-corruption and anti-bribery | Indicator number 16 Table #3 of Annex 1 | | | | Not relevant |

Table 35 – GBL consolidated entity - List of data points derived from other EU legislations

### 7.3.2.2.2 Disclosure of list of ESRS Disclosure Requirements complied with in preparing sustainability statement following outcome of materiality assessment

Considering (i) ESRS 1 Appendix B QC19 and EFRAG IG 1 §192; (ii) the fundamentally different nature of the industries GBL's participations operate in and their associated potential impacts; (iii) the lack of commonly shared topics / sub-topics / sub-sub-topics resulting from the analysis; and (iv) the lack of methodological ground to measure and to consolidate impacts that differ in nature in a meaningful way; GBL considers that apart for ESRS E1 sub-topic "climate change mitigation" (consolidated information related to GBL's overall portfolio emissions), ESRS S1 sub topic "own workforce" (consolidated information related to the number of employees), and ESRS G1 "corruption and bribery" (whistleblowing process in place), the consolidation of impacts for consolidated portfolio assets' under the top down approach is not supporting the production of meaningful and relevant information reflecting its intrinsic investment holding's portfolio management activities.

In this context, the table below summarizes the list of ESRS Disclosures Requirements applicable to GBL as a consolidated entity.

| Disclosure | ESRS E1 - Climate change | Page |
|---|---|---|
| *Governance* | | |
| ESRS 2, GOV-3 | Integration of sustainability-related performance in incentive schemes | page 40 |
| *Strategy* | | |
| E1-1 | Transition plan for climate change mitigation | page 65 |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | page 65 |
| *IRO* | | |
| ESRS 2, IRO-1 | Description of the processes to identify and assess material climate-related impacts, risks and opportunities | page 65 |
| E1-2 | Policies related to climate change mitigation and adaptation | page 65 |
| E1-3 | Actions and resources in relation to climate change policies | page 65 |
| *Metrics and targets* | | |
| E1-4 | Targets related to climate change mitigation and adaptation | page 65 |
| E1-5 | Energy consumption and mix | - |
| E1-6 | Gross Scopes 1, 2, 3 and Total GHG emissions | page 65 |
| E1-7 | GHG removals and GHG mitigation projects financed through carbon credits | Not applicable |
| E1-8 | Internal carbon pricing | Not applicable |
| E1-9 | Anticipated financial effects from material physical and transition risks and potential climate-related opportunities | page 65 |

Table 36 – GBL consolidated entity - ESRS disclosure requirements – ESRS E1

| Disclosure | ESRS S1 - Own Workforce | Page |
|---|---|---|
| *Strategy* | | |
| ESRS S1, SBM-2 | Interests and views of stakeholders | page 77 |
| ESRS S1, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business mode | page 77 |
| *IRO* | | |
| S1-1 | Policies related to own workforce | page 77 |
| S1-2 | Processes for engaging with own workers and workers' representatives about impacts | page 77 |
| S1-3 | Processes to remediate negative impacts and channels for own workers to raise concerns | page 77 |
| 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 action | page 77 |
| *Metrics and targets* | | |
| S1-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | page 77 |
| S1-6 | Characteristics of the undertaking's employee | page 77 |
| S1-7 | Characteristics of non-employee workers in the undertaking's own workforce | Not applicable |
| S1-8 | Collective bargaining coverage and social dialogue | Not applicable |
| S1-9 | Diversity metrics | Not applicable |
| S1-10 | Adequate wages | Not applicable |
| S1-11 | Social protection | Not applicable |
| S1-12 | Persons with disabilities | Not applicable |
| S1-13 | Training and skills development metrics | Not applicable |
| S1-14 | Health and safety metrics | Not applicable |
| S1-15 | Work-life balance metrics | Not applicable |
| S1-16 | Compensation metrics (pay gap and total compensation) | Not applicable |
| S1-17 | Incidents, complaints and severe human rights impacts | Not applicable |

Table 37 – GBL consolidated entity - ESRS disclosure requirements – ESRS S1

| Disclosure | ESRS G1 - Business conduct | Page |
|---|---|---|
| *Governance* | | |
| ESRS 2, GOV-1 | The role of the administrative, supervisory and management bodies | page 78 |
| *IRO* | | |
| ESRS 2, IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities | page 78 |
| G1-1 | Business conduct policies and corporate culture | page 78 |
| G1-2 | Management of relationships with suppliers | Not applicable |
| G1-3 | Prevention and detection of corruption and bribery | Not applicable |
| *Metrics and targets* | | |
| G1-4 | Incidents of corruption or bribery | Not applicable |
| G1-5 | Political influence and lobbying activities | Not applicable |
| G1-6 | Payment practices | Not applicable |

Table 38 – GBL consolidated entity - ESRS disclosure requirements – ESRS G1

Please refer to the subsequent list of ESRS disclosure requirements for GBL holding (§7.2.1.11 Disclosure of list of ESRS Disclosure Requirements complied with in preparing sustainability statement following outcome of materiality assessment, page 20) and its consolidated entities (§7.4 Appendix, page 81) for the relevant disclosures.

Consolidated entities' individual statements available in the Appendix (please refer to §7.4 Appendix, page 81), where the information does not pertain to consolidated DMA material subject matters, represent voluntary disclosures based on ESRS standards. For material topics at the disaggregated controlled participation level, please refer to the DMA consolidated assets – Impact materiality and DMA consolidated assets – Financial materiality tables above in this section.

Disclosures related to non-controlled participations (please refer to §7.3.3 Non-controlled participations, page 79) also represent voluntary disclosures included (i) to satisfy investors' requests (SFDR Art. 8 funds); (ii) to satisfy CDP integrated questionnaire disclosure requirements; and (iii) to ensure transparency on GBL's climate performance and achievements.

## 7.3.2.2.3 Disclosure of list of ESRS Disclosure Requirements incorporated by reference

Considering the heterogeneous activities of GBL's controlled participations, each sustainability matter identified as material at the level of the controlled participation is subsequently reported at the level of the relevant participation.

The sustainability statement of GBL as a holding company is prepared in accordance with ESRS requirements and is incorporated by reference in accordance with section 9.1 of ESRS 1 in the Part I of this sustainability statement (please refer to §7.2 Part I – GBL holding, page 9).

The sustainability statements of the controlled participations are prepared on the basis of ESRS requirements and are incorporated by reference in accordance with section 9.1 of ESRS 1 in the Appendix of this sustainability statement (please refer to §7.3.2.6 Controlled participations' sustainability statements, page 78 and §7.4 Appendix, page 81).

For GBL as a consolidated entity, the list of ESRS 2 disclosure requirements incorporated by reference are detailed above (please refer to §7.3.2.1 General information, page 53).

For GBL as a consolidated entity, the list of ESRS E1 disclosure requirements incorporated by reference are detailed below (please refer to §7.3.2.3 Consolidated environmental disclosures, page 65).

For GBL as a consolidated entity, the list of ESRS S1 disclosure requirements incorporated by reference are detailed below (please refer to §7.3.2.4 Consolidated social disclosures, page 77).

For GBL as a consolidated entity, the list of ESRS G1 disclosure requirements incorporated by reference are detailed below (please refer to §consommateurs et/ou les utilisateurs, page 79).

## 7.3.2.2.4 Negative materiality assessment

Considering GBL as a consolidated entity, ESRS E2 Pollution, ESRS E3 Water and marine resources, ESRS E4 Biodiversity, ESRS E5 Circular economy, ESRS S2 Workers, ESRS S3 Affected communities, and ESRS S4 Consumers and end-users did not arise in the longlist initially prepared by GBL with the support from Equintel. These topics have been assessed as non-material for GBL. This has been confirmed by the Equintel DMA tool's outcome for GBL. Please note that GBL as a consolidated entity did not screen its sites and business activities to identify E2-E5 related IROs. Please refer to the Appendix and Part I for the details of the DMA processes of each controlled participation (§7.2.1.8 Process to identify and assess material impacts, risks and opportunities, page 12 and §7.4 Appendix, page 81).

## 7.3.2.3 Consolidated environmental disclosures

### 7.3.2.3.1 Consolidated environmental disclosures – Mandatory disclosure requirements

The table below summarizes the list of ESRS E1 disclosures requirements applicable to GBL as a consolidated entity incorporated by reference.

| Disclosure | ESRS E1 - Climate change – Incorporation by reference | Page |
|---|---|---|
| *Governance* | | |
| ESRS 2, GOV-3 | Integration of sustainability-related performance in incentive schemes | page 40 |
| *Strategy* | | |
| E1-1 | Transition plan for climate change mitigation | page 24<br>page 81 |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | page 26<br>page 81 |
| *IRO* | | |
| ESRS 2, IRO-1 | Description of the processes to identify and assess material climate-related impacts, risks and opportunities | page 26<br>page 81 |
| E1-2 | Policies related to climate change mitigation and adaptation | page 27<br>page 81 |
| E1-3 | Actions and resources in relation to climate change policies | page 28<br>page 81 |
| *Metrics and targets* | | |
| E1-4 | Targets related to climate change mitigation and adaptation | page 28<br>page 81 |
| E1-5 | Energy consumption and mix | Not applicable |
| E1-6 | Gross Scopes 1, 2, 3 and Total GHG emissions | - |
| E1-7 | GHG removals and GHG mitigation projects financed through carbon credits | Not applicable |
| E1-8 | Internal carbon pricing | Not applicable |
| E1-9 | Anticipated financial effects from material physical and transition risks and potential climate-related opportunities | page 26<br>page 81 |

Table 39 – GBL consolidated entity - ESRS disclosure requirements – ESRS E1 – Incorporation by reference

### 7.3.2.3.2 Consolidated environmental disclosures - Greenhouse gas emissions

GBL's GHG emissions are calculated according to GHG Protocol (2012) under the equity-share methodology. The table below summarizes GHG emissions across GBL consolidated entities.

| FY2024 - t. $CO_2e$ | GBL | Imerys | Affidea | Sanoptis | Canyon | Sienna IM | GBL Consolidated |
|---|---|---|---|---|---|---|---|
| **NAV (% GBL's NAV)** | **100%** | **8.6%** | **9.7%** | **6.3%** | **1.7%** | **0.9%** | **27.2%** |
| **Ownership (%)** | **100%** | **54.72%** | **99.04%** | **83.23%** | **48.78%** | **100%** | |
| **Scope 1 GHG emissions** | | | | | | | |
| Direct emissions | 103 | 1,281,067 | 4,558 | 2,111 | 524 | 63 | 1,288,425 |
| Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%) | 0% | 34% | 0% | 0% | 0% | 0% | - |
| **Scope 2 GHG emissions** | | | | | | | |
| Indirect electricity-rel. emissions – Location-based | 42 | 600,795 | 12,995 | 2,994 | 939 | 50 | 617,815 |
| Indirect electricity-rel. emissions – Market-based | 7 | 501,699 | 12,995 | 2,994 | 98 | 38 | 517,831 |
| **Significant scope 3 GHG emissions** | | | | | | | |
| Total Scope 3 GHG emissions (ESRS) | 17,071,460 | 4,400,448 | 79,807 | 33,160 | 97,839 | 8,675,953 | 18,122,843 |
| Cat. 1 – Purchase goods and services | 78 | 1,660,082 | 51,953 | 11,434 | 58,055 | 3,596 | 1,785,198 |
| Cat. 2 – Capital goods | 9 | 263,015 | 3,650 | 15,455 | 976 | 83 | 283,188 |
| Cat. 3 – Upstream from scope 1 & scope 2 | 36 | 354,965 | 5,225 | 880 | 151 | 25 | 361,282 |
| Cat. 4 – Upstream transportation and distribution | ns[1] | 354,658 | Inc, cat,1&2 | ns | 30,860 | ns | 385,518 |
| Cat. 5 – Waste | 1 | 41,985 | 688 | 1,209 | 85 | 8 | 43,977 |
| Cat. 6 – Business travel | 594 | 6,318 | 667 | 298 | 761 | 135 | 8,773 |
| Cat. 7 – Employee commuting | 22 | 10,033 | 8,528 | 3,884 | 2,069 | 60 | 24,596 |
| Cat. 8 – Upstream leased assets | ns | ns | Inc, cat,2 | ns | ns | ns | ns |
| Cat. 9 – Downstream transportation and distribution | ns | 772,790 | 9,097 | ns | ns | ns | 781,887 |
| Cat. 10 – Processing of sold products | ns | 593,486 | ns | ns | ns | ns | 593,486 |
| Cat. 11 – Use of sold products | ns | 0 | ns | ns | 3,469 | ns | 3,469 |
| Cat. 12 – End-of-life treatment of sold products | ns | 169,670 | ns | ns | 1,413 | ns | 171,083 |
| Cat. 13 – Downstream leased assets | ns | ns | ns | ns | ns | ns | ns |
| Cat. 14 – Franchises | ns | ns | ns | ns | ns | ns | ns |
| Cat. 15a – Investments (GHG Protocol, equity share methodology based on scope 1 + scope 2)[2] | 1,320,192 | - | - | - | - | - | 322,621 |
| Cat. 15b – Investments (ESRS E1 46h(iii), scope 3) [2] | 15,750,528 | 173,446 | ns | ns | ns | 8,672,046 | 13,357,766 |
| **Total GHG emissions** | | | | | | | |
| Total GHG emissions (location-based) | 17,071,605 | 6,282,310 | 97,360 | 38,265 | 99,302 | 8,676,066 | 20,029,084 |
| Total GHG emissions (market-based) | 17,071,570 | 6,183,214 | 97,360 | 38,265 | 98,461 | 8,676,053 | 19,929,099 |
| **Intensity ratio** | | | | | | | |
| Revenues (EUR million) | -[3] | 3,604.9 | 784.1 | 1,037.6 | 665.7 | 105.8 | 6,198.0 |
| Intensity ratio: Total GHG emissions (location-based) / Net revenue | -[4] | 1,742.7 | 124.2 | 36.9 | 149.2 | 82,004.4 | -[4] |
| Intensity ratio: Total GHG emissions (market-based) / Net revenue | -[4] | 1,715.2 | 124.2 | 36.9 | 147.9 | 82,004.3 | -[4] |

Table 40 – GBL consolidated entity - Consolidated GHG emissions

1 Non-significant
2 Please refer to GBL GHG emissions – Portfolio level (FY2024) table (§7.3.3.1 Non-controlled investments' GHG emissions, page 79)
3 No revenue recognized for GBL holding. Cf. Note 8, Consolidated financial statements 'Turnover'
4 For an investment holding company, an intensity ratio based on consolidated revenue metric is non-relevant when the assets consolidated represent only 27.2% of the NAV. Please refer to intensity ratio based on NAV to assess portfolio carbon intensity (cf. §7.2.2.7 GHG emissions, page 30)

### 7.3.2.3.3 Consolidated environmental disclosures – Taxonomy

## Reporting scope and methodology

GBL supports the ambitions pursued at EU level by the establishment of the EU Taxonomy under the Taxonomy Regulation.

The EU Taxonomy aims at creating a classification system for the purposes of determining whether an economic activity can be qualified as environmentally sustainable. In accordance with Article 8 of the Taxonomy Regulation, GBL has assessed how and to what extent its own activities and the activities of its consolidated companies are associated with economic activities that are considered to be environmentally sustainable under the EU Taxonomy. The content and presentation of this information is specified by the Commission Delegated Regulation (EU) 2021/2178 of July 6, 2021 (as amended, the "Disclosures Delegated Act").

The Taxonomy Regulation and the Disclosures Delegated Act require GBL to disclose in this sustainability report (i) the proportion of the turnover of GBL's consolidated activities that are derived from products and services associated with environmentally sustainable economic activities in the sense of the EU Taxonomy and (ii) the proportion of capital expenditure (CapEx) and operating expenditure (OpEx) of GBL's consolidated activities that are related to assets or processes associated with environmentally sustainable economic activities in the sense of the EU Taxonomy.

The Taxonomy-related disclosures presented in this section cover the full array of GBL's consolidated activities for the 2024 financial year. In this sustainability report, the alignment of GBL's consolidated activities with the EU Taxonomy has been assessed with respect to the environmental objectives of climate change mitigation and climate change adaptation as required by Delegated Regulation (EU) 2021/2139 (as amended, the "Climate Delegated Act") and the environmental objectives of the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control, and the protection and restoration of biodiversity and ecosystems as required by Delegated Regulation (EU) 2023/2486 (the "Environmental Delegated Act").

GBL has, however, not identified within the group any activities that are referred to in the Environmental Delegated Act. No disclosure is therefore included in this respect. Please note that Sienna IM's disclosures pursuant to the Disclosures Delegated Act, the Climate Delegated Act and the Environmental Delegated Act have not been considered in the consolidated disclosures provided by GBL in this section of its sustainability statement but rather in Sienna IM's dedicated Appendix (please refer to §7.4 Appendix, page 81).

The revenue, CapEx and OpEx resulting or associated with Taxonomy-eligible economic activities have been determined as per the Disclosures Delegated Act, the Climate Delegated Act and the Environmental Delegated Act.

These financial data are extracted from the financial statements so that the revenue and expenditure figures given in this section tie in with the consolidated financial statements (see Notes 8, 11 & 6 of the consolidated financial statements, Annual Report 2024 and Imerys' disclosures in §7.4 Appendix, page 81):

(i) Revenue recognized in accordance with IFRS standard (IAS 1).

(ii) CapEx constituting expenses related to eligible activities calculated based on the increases in tangible and intangible assets for the year before revaluation, depreciation and amortization and excluding changes in fair value and increases related to business combinations (IAS 16, IAS 38, IAS 40, IAS 41, IFRS 16).

(iii) Non-capitalized direct costs related to research and development, building renovation measures, short-term leases, maintenance and repair and any other direct expenditures related to the day-to-day servicing of items of property, plant and equipment that are necessary to ensure the continued and effective functioning of such assets. These items relate to various lines of the company's income statement.

No individual capital expenditure other than that associated with the Taxonomy-eligible economic activities reported above has been identified as of December 31, 2024.

Market practice on the application and interpretation of certain terms under the Taxonomy Regulation and its delegated acts has not yet entirely settled as the legislation has only recently been introduced. It may therefore be that as market practice develops around this, and the EU Taxonomy is developed further, our disclosures may change.

Notwithstanding some uncertainties around the application in practice of the Taxonomy Regulation and its delegated acts, GBL has made its best efforts to collect reliable data on the Taxonomy-eligibility and alignment of its consolidated activities with the EU Taxonomy. The Taxonomy related disclosures presented in this section are made on the basis of GBL's best understanding of the terms and concepts used under the Taxonomy Regulation and its delegated acts (as the case may be, as clarified by the European Commission).

## Disclosures related to Annex XII of Delegated Regulation (EU) 2022/1214

The table below presents GBL's exposure to nuclear energy and fossil gas related activities pursuant to the Delegated Regulation (EU) 2022/1214.

| Nuclear energy related activities | |
|---|---|
| (1) The undertaking carries out, funds or has exposure to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle. | No |
| (2) The undertaking carries out, funds or has exposure to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies. | No |
| (3) The undertaking carries out, funds or has exposure to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades. | No |
| **Fossil gas related activities** | |
| (4) The undertaking carries out, funds or has exposure to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. | No |
| (5) The undertaking carries out, funds or has exposure to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels. | No |
| (6) The undertaking carries out, funds or has exposure to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels. | No |

Table 41 – GBL consolidated entity - Annex XII of Delegated Regulation (EU) 2022/1214

## Taxonomy-eligibility of GBL's consolidated activities

The analysis of the eligibility of GBL's consolidated activities was carried out with regard to the Taxonomy Regulation, the Disclosures Delegated Act, the Climate Delegated Act and the Environmental Delegated Act.

According to those regulations, the group has identified that certain of its economic activities qualify as Taxonomy-eligible economic activities. Within the group:

(i) Imerys manufactures carbon black (NACE code C20.13), which is eligible pursuant to section 3.11 of Annex I to the Climate Delegated Act and is a transitional activity in relation to the environmental objective of climate change mitigation if it complies with the relevant technical screening criteria set out in the Climate Delegated Act (the "Technical Screening Criteria").

The manufacturing of carbon black is indeed an essential component in the value chain to transition to electric vehicles for the mobile energy market. Transitioning to electric vehicles is a key priority in the fight against climate change. Imerys is a leading supplier of highly conductive carbon-based solutions for lithium-ion batteries used in electric vehicles. These value-added solutions contribute to the transition from fossil fuel-based energy to sustainable energy, by providing crucial materials that boost energy density and shorten charging times of lithium-ion batteries.

Pursuant to section 3.11 of Annex II to the Climate Delegated Act, carbon black manufacturing may also be eligible for the environmental objective of climate change adaptation. However, considering the intrinsic substantial contribution of this activity to climate change mitigation and industry practices, the eligibility of this activity to the environmental objective of climate change adaptation has not been retained.

(ii) Imerys manufactures cement clinker, cement or alternative binder (NACE code C23.51), which is eligible pursuant to section 3.7 of Annex I to the Climate Delegated Act and is a transitional activity in relation to the environmental objective of climate change mitigation if it complies with the relevant Technical Screening Criteria.

The manufacturing of these products is part of Imerys' Refractories, Abrasives and Construction business activity. They support the transition to sustainable construction by providing building chemicals solutions. Building chemicals are experiencing strong growth, as they reduce the carbon footprint of calcium aluminate cement and concrete. Imerys produces calcium aluminates for the building industry, where these additives improve the productivity of concrete, in particular by accelerating its hardening. Imerys also manufactures calcium aluminate-based mortar to protect sewer systems against biogenic corrosion, offering an extended service life and, as a consequence lowering the consumption of raw materials, reducing labor and trucking needs, subsequently reducing the utility owner's greenhouse gas emissions, as well as reducing asset downtime increasing productivity and lowering the risk for untreated water to be released into the environment.

Pursuant to section 3.7 of Annex II to the Climate Delegated Act, Imerys' cement clinker, cement or alternative blinder may also be eligible for the environmental objective of climate change adaptation. However, considering the intrinsic substantial contribution of this activity to climate change mitigation and industry practices, the eligibility of this activity to the environmental objective of climate change adaptation has not been retained.

(iii) Canyon manufactures bicycles (NACE code C30.9.2), which is eligible pursuant to section 3.3 of Annex I to the Climate Delegated Act and is an enabling activity in relation to the environmental objective of climate change mitigation if it complies with the relevant Technical Screening Criteria.

Mobility is an essential element of development strategies that aims to achieve sustainable development and meeting the needs of people who cycle is a critical part of the mobility solution for helping cities de-couple population growth from increased emissions, to improve air quality and road safety. Besides, cycling generates health and non-air polluting lifestyles.

Pursuant to section 3.3 of Annex II to the Climate Delegated Act, Canyon's bicycle manufacturing activity may also be eligible for the environmental objective of climate change adaptation. However, considering the intrinsic substantial contribution of this activity to climate change mitigation and industry practices, the eligibility of this activity to the environmental objective of climate change adaptation has not been retained.

Pursuant to the analysis by the group entities as set out above not to retain the above-mentioned economic activities with respect to the environmental objective of climate change adaptation, which GBL applies to ensure consistency with the reporting of its group entities, and given that these activities are all carried out independently from each other, there is no risk of double counting across the environmental objectives set out in the EU Taxonomy or in the allocation of revenues, CapEx and OpEx across the Taxonomy-eligible economic activities.

The table below summarizes GBL's Taxonomy-eligible activities in relation to the environmental objective of climate change mitigation. In 2024, GBL's Taxonomy-eligible activities represented 22% of the revenue, 16% of CapEx and 4% of OpEx as shown in the summarized table below.

| | 2024 | | | | | | 2023 | | | | | | 2022 | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| In EUR million and in % | Revenue | | CapEx | | OpEx | | Revenue | | CapEx | | OpEx | | Revenue | | CapEx | | OpEx | |
| Taxonomy Non-Eligible activity | 4,810 | *78%* | 489 | *84%* | 1,317 | *96%* | 4,754 | *77%* | 566 | *86%* | 1,319 | *96%* | 6,897 | *85%* | 541 | *85%* | 1,776 | *98%* |
| Taxonomy Eligible activity | 1,388 | *22%* | 93 | *16%* | 50 | *4%* | 1,383 | *23%* | 91 | *14%* | 48 | *4%* | 1,212 | *15%* | 94 | *15%* | 42 | *2%* |
| **Total all activities** | 6,198 | *100%* | 582 | *100%* | 1,367 | *100%* | 6,137 | *100%* | 656 | *100%* | 1,367 | *100%* | 8,109 | *100%* | 635 | *100%* | 1,818 | *100%* |

Table 42 – GBL consolidated entity - GBL's EU Taxonomy summary table

Revenue Taxonomy-eligible economic activities marginally increased in 2024 compared to 2023 (0.4% YoY) mainly due to a marginally higher contribution from Imerys' activities. The increase in CapEx associated with Taxonomy-eligible economic activities in 2024 compared to 2023 (EUR 1.8 million or +2% YoY) is mainly due to an increase of Canyon's investments at its own assembly plant and warehouse. OpEx Taxonomy-eligible economic activities marginally increased in 2024 compared to 2023 (+3% YoY) mainly due to an increase of Imerys' spending across its different taxonomy-eligible economic activities.

## Taxonomy-alignment of GBL's consolidated activities

The assessment of alignment of GBL's consolidated activities with the EU Taxonomy has been conducted using the Technical Screening Criteria set for the environmental objective of climate change mitigation.

The following tables show the results of the assessment of the Taxonomy-eligibility and the Taxonomy-alignment of GBL's consolidated activities. Their formats correspond to those of the templates for key performance indicators to be disclosed by non-financial companies as set out in Annex II of the Disclosures Delegated Act.

| FY2024 | | 2024 | | Substantial Contribution criteria | | | | | | DNSH Criteria ("Do No Significant Harm") | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Economic Activities | Code | Turnover | Proportion of Turnover, year N | Climate Change Mitigation | Climate Change Adaptation | Water | Pollution | Circular Economy | Biodiversity | Climate Change Mitigation | Climate Change Adaptation | Water | Pollution | Circular Economy | Biodiversity | Minimum Safeguard | Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) turnover, year N-1 | Category enabling activity | Category transitional activity |
| | | M€ | % | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| **A. TAXONOMY-ELIGIBLE ACTIVITIES** | | | | | | | | | | | | | | | | | | | |
| *A.1 Environmentally sustainable activities (Taxonomy-aligned)* | | | | | | | | | | | | | | | | | | | |
| *Manufacture of cement clinker, cement or alternative binder* | *CCM 3.7* | 428.7 | 6.9% | Y | N | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 6.9% | | T |
| **Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)** | | **428.7** | **6.9%** | **6.9%** | **0%** | **0%** | **0%** | **0%** | **0%** | **Y** | **Y** | **Y** | **Y** | **Y** | **Y** | **Y** | **6.9%** | | |
| *Of which enabling* | | 0.0 | 0.0% | 0% | 0% | 0% | 0% | 0% | 0% | | | | | | | | 0.0% | E | |
| *Of which transitional* | | 428.7 | 6.9% | 6.9% | | | | | | Y | Y | Y | Y | Y | Y | Y | 6.9% | | T |
| *A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)* | | | | | | | | | | | | | | | | | | | |
| | | | | EL; N/EL | EL; N/EL | EL; N/EL | EL; N/EL | EL; N/EL | EL; N/EL | | | | | | | | | | |
| *Manufacture of cement clinker, cement or alternative binder* | CCM 3.7 | 43.9 | 0.7% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 0.7% | | |
| *Manufacture of carbon black* | CCM 3.11 | 127.9 | 2.1% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 1.8% | | |
| *Manufacture of low carbon technologies for transport* | CCM 3.3 | 787.5 | 12.7% | EL | N/EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 13.1%[1] | | |
| Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2) | | 959.3 | 15.5% | 15.5% | 0% | 0% | 0% | 0% | 0% | | | | | | | | 15.6% | | |
| Turnover of Taxonomy-eligible activities (A.1+A.2) | | 1388.0 | 22.4% | 22.4% | 0% | 0% | 0% | 0% | 0% | | | | | | | | 22.5% | | |
| **B. TAXONOMY NON-ELIGIBLE ACTIVITIES** | | | | | | | | | | | | | | | | | | | |
| **Turnover of non-eligible activities** | | **4810.0** | **77.6%** | | | | | | | | | | | | | | | | |
| **TOTAL** | | **6198.0** | **100%** | | | | | | | | | | | | | | | | |

Table 43 – GBL consolidated entity - GBL's EU Taxonomy - Revenue

1 Classified in FY2023 under taxonomy-aligned activity

| FY2024 | 2024 | | | Substantial Contribution criteria | | | | | | DNSH Criteria ("Do No Significant Harm") | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Economic Activities | Code | CapEx | Proportion of CapEx, year N | Climate Change Mitigation | Climate Change Adaptation | Water | Pollution | Circular Economy | Biodiversity | Climate Change Mitigation | Climate Change Adaptation | Water | Pollution | Circular Economy | Biodiversity | Minimum Safeguard | Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) CapEx, year N-1 | Category enabling activity | Category transitional activity |
| | | M€ | % | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| **A. TAXONOMY-ELIGIBLE ACTIVITIES** | | | | | | | | | | | | | | | | | | | |
| *A.1 Environmentally sustainable activities (Taxonomy-aligned)* | | | | | | | | | | | | | | | | | | | |
| *Manufacture of cement clinker, cement or alternative binder* | *CCM 3.7* | 26.6 | 4.6% | Y | N | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 4.9% | | T |
| *Manufacture of carbon black* | *CCM 3.11* | 3.4 | 0.6% | Y | N | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 0.3% | | T |
| **CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)** | | **30.0** | **5.2%** | **5.2%** | **0%** | **0%** | **0%** | **0%** | **0%** | **Y** | **Y** | **Y** | **Y** | **Y** | **Y** | **Y** | **5.2%** | | |
| *Of which enabling* | 0.0 | 0.0 | 0.0% | 0% | 0% | 0% | 0% | 0% | 0% | | | | | | | | 0.0% | E | |
| *Of which transitional* | 30.0 | 30.0 | 5.2% | 5.2% | | | | | | Y | Y | Y | Y | Y | Y | Y | 5.2% | | T |
| *A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)* | | | | | | | | | | | | | | | | | | | |
| | | | | EL; N/EL | EL; N/EL | EL; N/EL | EL; N/EL | EL; N/EL | EL; N/EL | | | | | | | | | | |
| *Manufacture of cement clinker, cement or alternative binder* | *CCM 3.7* | 3.7 | 0.6% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 0.2% | | |
| *Manufacture of carbon black* | *CCM 3.11* | 29.4 | 5.0% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 7.7% | | |
| *Manufacture of low carbon technologies for transport* | *CCM 3.3* | 29.7 | 5.1% | EL | N/EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 0.8%[1] | | |
| **CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)** | | **62.8** | **10.8%** | 10.8% | 0% | 0% | 0% | 0% | 0% | | | | | | | | **8.6%** | | |
| **CapEx of Taxonomy-eligible activities (A.1+A.2)** | | **92.8** | **15.9%** | 15.9% | 0% | 0% | 0% | 0% | 0% | | | | | | | | **13.9%** | | |
| **B. TAXONOMY NON-ELIGIBLE ACTIVITIES** | | | | | | | | | | | | | | | | | | | |
| **CapEx of non-eligible activities** | | **489.4** | **84.1%** | | | | | | | | | | | | | | | | |
| **TOTAL** | | **582.2** | **100%** | | | | | | | | | | | | | | | | |

Table 44 – GBL consolidated entity - GBL's EU Taxonomy - CapEx

1 Classified in FY2023 under taxonomy-aligned activity

| FY2024 | 2024 | | | Substantial Contribution criteria | | | | | | DNSH Criteria ("Do No Significant Harm") | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Economic Activities | Code | OpEx | Proportion of OpEx, year N | Climate Change Mitigation | Climate Change Adaptation | Water | Pollution | Circular Economy | Biodiversity | Climate Change Mitigation | Climate Change Adaptation | Water | Pollution | Circular Economy | Biodiversity | Minimum Safeguard | Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) OpEx, year N-1 | Category enabling activity | Category transitional activity |
| | | M€ | % | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| **A. TAXONOMY-ELIGIBLE ACTIVITIES** | | | | | | | | | | | | | | | | | | | |
| *A.1 Environmentally sustainable activities (Taxonomy-aligned)* | | | | | | | | | | | | | | | | | | | |
| *Manufacture of cement clinker, cement or alternative binder* | *CCM 3.7* | 26.7 | 2.0% | Y | N | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 1.8% | | T |
| **OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)** | | **26.7** | **2.0%** | **2.0%** | **0%** | **0%** | **0%** | **0%** | **0%** | **Y** | **Y** | **Y** | **Y** | **Y** | **Y** | **Y** | **1.8%** | | |
| *Of which enabling* | | 0.0 | 0.0% | 0% | 0% | 0% | 0% | 0% | 0% | | | | | | | | 0.0% | E | |
| *Of which transitional* | | 26.7 | 2% | 2% | | | | | | Y | Y | Y | Y | Y | Y | Y | 1.8% | | T |
| *A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)* | | | | | | | | | | | | | | | | | | | |
| | | | | EL; N/EL | EL; N/EL | EL; N/EL | EL; N/EL | EL; N/EL | EL; N/EL | | | | | | | | | | |
| *Manufacture of cement clinker, cement or alternative binder* | *CCM 3.7* | 0.7 | 0.1% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 0.1% | | |
| *Manufacture of carbon black* | *CCM 3.11* | 5.6 | 0.4% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 0.3% | | |
| *Manufacture of low carbon technologies for transport* | *CCM 3.3* | 16.6 | 1.2% | EL | N/EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 1.3% | | |
| **OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)** | | **22.9** | **1.7%** | 1.7% | 0% | 0% | 0% | 0% | 0% | | | | | | | | **1.7%** | | |
| **OpEx of Taxonomy-eligible activities (A.1+A.2)** | | **49.6** | **3.6%** | 3.6% | 0% | 0% | 0% | 0% | 0% | | | | | | | | **3.5%** | | |
| **B. TAXONOMY NON-ELIGIBLE ACTIVITIES** | | | | | | | | | | | | | | | | | | | |
| **OpEx of non-eligible activities** | | **1317.1** | **96.4%** | | | | | | | | | | | | | | | | |
| **TOTAL** | | **1366.7** | **100.0%** | | | | | | | | | | | | | | | | |

Table 45 – GBL consolidated entity - GBL's EU Taxonomy - OpEx

The tables above show that a majority of GBL's Taxonomy-eligible economic activities are also Taxonomy-aligned:

- Revenues: in 2024, 22.4% of GBL's consolidated activities are eligible under the EU Taxonomy; 6.9% of GBL's consolidated activities meet the Technical Screening Criteria set by the Climate Delegated Act and the other requirements for Taxonomy-alignment under the Taxonomy Regulation and, hence, are aligned with the EU Taxonomy;
- CapEx: in 2024, 15.9% of GBL's consolidated activities are eligible under the EU Taxonomy, while 5.2% of GBL's consolidated activities meet the Technical Screening Criteria set by the Climate Delegated Act and the other requirements for Taxonomy-alignment under the Taxonomy Regulation and, hence, are aligned with the EU Taxonomy;
- OpEx: in 2024, 3.6% of GBL's consolidated activities are eligible under the EU Taxonomy, 2.0% of GBL's consolidated activities meet the Technical Screening Criteria set by the Climate Delegated Act and the other requirements for Taxonomy-alignment under the Taxonomy Regulation and, hence, are aligned with the EU Taxonomy.

Eligibility and alignment per environmental objective is summarized in the tables below.

| | Proportion of turnover / Total turnover | |
|---|---|---|
| | Taxonomy-aligned per objective | Taxonomy-eligible per objective |
| Climate change mitigation | 6.9% | 22.4% |
| Climate change adaptation | - | - |
| Water | - | - |
| Pollution | - | - |
| Circular economy | - | - |
| Biodiversity | - | - |

Table 46 – GBL consolidated entity - Turnover eligibility and alignment per environmental objective

| | Proportion of CapEx / Total CapEx | |
|---|---|---|
| | Taxonomy-aligned per objective | Taxonomy-eligible per objective |
| Climate change mitigation | 5.2% | 15.9% |
| Climate change adaptation | - | - |
| Water | - | - |
| Pollution | - | - |
| Circular economy | - | - |
| Biodiversity | - | - |

Table 47 – GBL consolidated entity - CapEx eligibility and alignment per environmental objective

| | Proportion of OpEx / Total OpEx | |
|---|---|---|
| | Taxonomy-aligned per objective | Taxonomy-eligible per objective |
| Climate change mitigation | 2.0% | 3.6% |
| Climate change adaptation | - | - |
| Water | - | - |
| Pollution | - | - |
| Circular economy | - | - |
| Biodiversity | - | - |

Table 48 – GBL consolidated entity – OpEx eligibility and alignment per environmental objective

## Substantial contribution criteria

### Imerys

Internal reporting systems and data were used to verify compliance of the corresponding limit values at plant level with the criteria defining whether there is substantial contribution to the environmental objective of climate change mitigation as set out in the Climate Delegated Act.

Calcium aluminate cement activities

- According to the Climate Delegated Act, calcium aluminate cement manufacturing activities contribute to the environmental objective of climate change mitigation if their specific GHG emissions are lower than 0.722 $tCO_2e$ per ton of product.
- The GHG emissions of 8 plants out of a total of 9 plants manufacturing calcium aluminate cement are below this threshold and therefore contribute substantially to the environmental objective of climate change mitigation. Only one plant is marginally above the threshold of 0.7222 $tCO_2e$ per ton of product. Therefore, only the 8 manufacturing plants will be reviewed for the rest of the alignment study.

Carbon black activities

- According to the Climate Delegated Act, carbon black activities contribute substantially to the environmental objective of climate change mitigation if the GHG emissions from the carbon black production processes are lower than 1.141 $tCO_2e$ per ton of product.
- Imerys' carbon black activities are eligible but not aligned with the EU Taxonomy on the climate change mitigation criteria, since the GHG emissions of Imerys' manufacturing facilities (3.5 tC02e per ton of product) are above this threshold.
- However, it is to be noted that the Technical Screening Criteria are based on the EU ETS product benchmark for the manufacture of "furnace carbon black", used for the tire industry.
- Imerys' high value added "conductive carbon black" has different properties from "furnace carbon black" and is not produced through the same process.
- However, in line with its efforts to continuously reduce greenhouse gas emissions, Imerys is pursuing an energy recovery project scheduled for completion by 2025, which is expected to reduce emissions to below the threshold set out in the Technical Screening Criteria.
- Imerys started work on the energy recovery project in 2022. Consequently, while no revenue associated with the carbon black activity is considered to be Taxonomy-is aligned, the CapEx related to the energy recovery project (EUR 3.4 million in 2024, out of the EUR 32.8 million invested in 2024 for carbon black activities) is considered part of a "CapEx plan" to allow Taxonomy-eligible economic activities to become Taxonomy-aligned within a period of five years. Therefore, this portion of the CapEx has been isolated and reported as "Taxonomy-aligned".

### Canyon

Canyon's bike manufacturing activities corresponding to 100% of bike revenue are contributing substantially to the environmental objective of climate change mitigation thanks to the products manufactured meeting the Technical Screening Criteria: personal mobility devices with a propulsion that comes from the physical activity of the user ("push bikes") or a mix of zero-emissions motor and physical activity ("electric bikes").

## Do No Significant Harm criteria

### Imerys

With regard to the "Do No Significant Harm" (DNSH) criteria set out in Article 3 of Regulation (EU) 2020/852 for the applicable environmental objectives, Imerys has verified and validated that all its eligible activities comply with the DNSH criteria, local and internal requirements on the following environmental objectives: (i) climate change adaptation; (ii) sustainable use and protection of water and marine resources; (iii) pollution prevention and control; and (iv) protection and restoration of biodiversity and ecosystems. The table below explains Imerys' methodology to validate those DSNH criteria for the calcium aluminate cement activities.

| DNSH | Description of the validation procedures for calcium aluminate cement activities |
|---|---|
| Climate change adaptation | A physical climate risk assessment of all sites of the Group for the current situation and 2050 time-horizon has been carried out and complemented by a risk identification analysis by the Group's global insurance Group.<br><br>Based on the recommendations of the Group's global insurance provider, an adaptation plan was set up to mitigate each relevant risk identified in 2024 (flooding, hurricanes and water scarcity), with the implementation of actions on a rolling basis. |
| Sustainable use and protection of water<br><br>and marine resources | An assessment was carried out at all the sites concerned, based on the environmental analyses carried out each year, as well as on compliance with the environmental regulations in force in the various countries.<br><br>For example, to mitigate the risk of water use during drought periods, the Le Teil site in France has made significant optimization for the clinker cooling process in the past years and significantly reduced the corresponding water consumption. |
| Pollution prevention and control | For pollution prevention along the value-chain: the product stewardship team has checked that activities related to the manufacturing of calcium aluminate cement do not lead to the manufacture, placing on the market or use of raw materials containing substances listed in the regulations related to the DSNH pollution prevention.<br><br>For emissions control: the eligible sites are operating with a valid license and under regular inspection by authorities for emissions control. To date, none of the eligible sites in Europe are in the management scope of the European BAT (Best Available Techniques) for air emissions control. When necessary, the eligible sites are investing to maintain or upgrade the emissions control facilities for compliance. |
| Transition to a circular economy | The DNSH criterion related to the "Transition to a circular economy" objective is not applicable to the manufacture of calcium aluminate cement as per the Disclosure Delegated Act. |
| Protection and restoration of biodiversity<br><br>and ecosystems | Imerys has validated this criterion for all its calcium aluminate eligible activities by<br><br>ensuring that the permits had been delivered for each site and that the eligible sites are not located near biodiversity sensitive areas, according to the mapping of IUCN categories. |

Table 49 – Imerys DNSH criteria

## Canyon

With regard to the DNSH criteria set out in Article 3 of the Taxonomy Regulation for the applicable environmental objectives, Canyon has verified whether its Taxonomy-eligible economic activities related to the environmental objective of climate change mitigation comply with the DNSH criteria (as outlined in the Climate Delegated Act) for the environmental objective of 'climate change adaptation.' To assess compliance with the climate change adaptation objective, Canyon conducted a physical climate risk and vulnerability assessment, covering both its operations and the value chain, in accordance with the requirements of Annex I of the Commission Delegated Regulation (EU 2021/2139). The framework used for the assessment of physical risks is based the and 6th IPCC Assessment Report (AR6) and covers 4 IPCC scenarios (High: SSP5-RCP8.5, Moderate-High: SSP3-RCP7.0, Moderate: SSP2-RVP4.5, Low: SSP1-RCP2.6). Each scenario was assessed yearly by decade from 2020 to 2090, to capture both near-term and long-term risks. Where climate-related hazards were identified, adaptation measures were defined and are being implemented

Canyon has verified compliance with the objective of 'protection and restoration of biodiversity and ecosystems'. To verify compliance with this objective, an Environmental Impact Assessment (EIA) or screening in accordance with Directive 2011/92/EU (or the respective national implementation) is required where applicable. In accordance with Annex I of the Federal Act of Environmental Impact Assessment, no such assessment is applicable for activities conducted by Canyon. Additionally, an assessment covering activities that are carried out in or near areas with sensitive biodiversity (including the Natura 2000 network of protected areas, UNESCO World Heritage sites and priority areas for biodiversity and other protected areas) must be conducted. No activity is carried out near such areas.

The objective of 'transition to a circular economy' was verified as partially met. The eligible economic activity includes the assessment of availability and, where possible, the implementation of procedures that support a) the reuse and utilization of secondary raw materials and reused components in manufactured products, and b) the design for high durability, recyclability, ease of disassembly, and adaptability of manufactured products. Compliance with the sub-objectives of c) waste management prioritizing recycling over disposal in the manufacturing process, and d) information on substances of concern and traceability of these substances throughout the life cycle of the manufactured products could not be fully verified.

Compliance with the DNSH criteria of the objectives listed below could not be verified.

- 'Sustainable use and protection of water and marine resources' requires the identification and management of environmental degradation risks related to preserving water quality and preventing water stress, with the goal of achieving good water status and good ecological potential as defined in Article 2, points (22) and (23), of Regulation (EU) 2020/852 (Taxonomy).
- 'Pollution prevention and control' requires that the generic criteria for pollution prevention and control regarding the use and presence of chemicals are met. The criteria are listed in appendix C of the Taxonomy regulations and outline that the activity does not lead to the manufacturing, placing on the market or use of referenced substances. A screening was performed to assess compliance with the objective.

## Minimum Safeguards

### Imerys

As defined in Article 3 of the Taxonomy Regulation, an activity shall qualify as environmentally sustainable only if it is carried out in compliance with the specific minimum safeguards detailed in the regulation. The Final Report on Minimum Safeguards by the Platform on Sustainable Finance identifies four core topics for which compliance with Minimum Safeguards should be defined, namely: human rights (including workers' rights), bribery, taxation and fair competition.

(i) Human Rights - Imerys is committed to respecting internationally recognized human rights and standards, in particular the International Bill of Human Rights, the Guidelines of the Organisation for Economic Co-operation and Development ("OECD"), the provisions of the fundamental conventions of the International Labor Organization ("ILO") and the UN Guiding Principles on Business and Human Rights. Imerys has adopted a Duty of Care Program to identify and prevent, notably, severe impacts on human rights, fundamental freedoms and health and safety resulting from the activities of the Group and those of its subcontractors and suppliers, in line with the French Law on Devoir de Vigilance. This program is defined in the Group Duty of Care Protocol.

(ii) Bribery - Imerys has adopted a comprehensive Antibribery Compliance Program to prevent, detect and remediate bribery incidents or allegations in compliance with the requirements of the French Sapin II Law. This program is defined in the Group Antibribery Policy and supported by several procedures.

(iii) Taxation - The Group Tax Policy is fully in line with the best international standards with respect to anti-tax avoidance and tax evasion practices. The Group operates in countries chosen solely for industrial or commercial purposes and does not enter into artificial arrangements for tax planning purposes, neither transfer value created to low tax jurisdictions, nor use secrecy jurisdictions or so-called "tax havens" for tax avoidance. It is committed to full compliance with its tax obligations, paying the right amount of tax in the right country at the right time.

(iv) Fair Competition - Imerys has adopted a comprehensive Antitrust Compliance Program to prevent, detect, and remediate potential antitrust law violations. It is defined in the Group Antitrust Policy and is supported by several procedures.

In addition, no convictions or violations were recorded during the reporting year, likely to call into question compliance with the minimum safeguards.

### Canyon

With regard to the criteria of "Minimum Safeguards" outlined in the Canyon Code of Ethics and ESG Policies, Canyon is committed to complying with local legislation in force in the countries where it operates and to respecting internationally recognized human rights and standards. In particular, Canyon acknowledges the provisions set out by the UN Guiding Principles on Human Rights and the OECD Guidelines. Canyon conducts annual ESG risk assessments and, when necessary, ad-hoc assessments.

Improvement opportunities have been identified regarding management training, the formalization of existing preventive measures related to bribery and corruption and fair competition as well as the enhancement of the effectiveness assessment related to taxation related risk management systems. Regarding the Commission Notice on the interpretation and implementation of certain provisions of the EU Taxonomy Regulation and on the links to the Regulation on sustainability-related disclosure requirements Sustainability indicators for adverse impacts according to Annex I of Delegated Regulation (EU) 2022/1288 ("SFDR") further improvement opportunities were identified. Canyon does not fully meet the requirements for "minimum safeguards".

## 7.3.2.4 Consolidated social disclosures

### 7.3.2.4.1 Consolidated social disclosures – Mandatory disclosure requirements

The table below summarizes the list of ESRS S1 disclosures requirements applicable to GBL as a consolidated entity incorporated by reference.

| Disclosure | ESRS S1 - Own Workforce – Incorporation by reference | Page |
|---|---|---|
| *Strategy* | | |
| ESRS S1, SBM-2 | Interests and views of stakeholders | page 34<br>page 81 |
| ESRS S1, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business mode | page 34<br>page 81 |
| *IRO* | | |
| S1-1 | Policies related to own workforce | page 35<br>page 81 |
| S1-2 | Processes for engaging with own workers and workers' representatives about impacts | page 36<br>page 81 |
| S1-3 | Processes to remediate negative impacts and channels for own workers to raise concerns | page 37<br>page 81 |
| 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 action | page 37<br>page 81 |
| *Metrics and targets* | | |
| S1-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | page 38<br>page 81 |
| S1-6 | Characteristics of the undertaking's employee | Not applicable |
| S1-7 | Characteristics of non-employee workers in the undertaking's own workforce | Not applicable |
| S1-8 | Collective bargaining coverage and social dialogue | Not applicable |
| S1-9 | Diversity metrics | Not applicable |
| S1-10 | Adequate wages | Not applicable |
| S1-11 | Social protection | Not applicable |
| S1-12 | Persons with disabilities | Not applicable |
| S1-13 | Training and skills development metrics | Not applicable |
| S1-14 | Health and safety metrics | Not applicable |
| S1-15 | Work-life balance metrics | Not applicable |
| S1-16 | Compensation metrics (pay gap and total compensation) | Not applicable |
| S1-17 | Incidents, complaints and severe human rights impacts | Not applicable |

Table 50 – GBL consolidated entity - ESRS disclosure requirements – ESRS S1 – Incorporation by reference

### 7.3.2.4.2 Consolidated social disclosures – Number of employees

The table below summarizes the number of employees across GBL's consolidated entities.

| FY2024 | GBL | Imerys | Affidea | Sanoptis | Canyon | Sienna IM | GBL Consolidated |
|---|---|---|---|---|---|---|---|
| Nu. employees | 83 | 12,392 | 9,233 | 4,692 | 1,659 | 271 | 28,330 |

Table 51 – GBL consolidated entity - Number of employees

## 7.3.2.5 Consolidated governance disclosures

### 7.3.2.5.1 Consolidated governance disclosures – Mandatory disclosure requirements

The table below summarizes the list of ESRS G1 disclosures requirements applicable to GBL as a consolidated entity incorporated by reference.

| Disclosure | ESRS G1 - Business conduct – Incorporation by reference | Page |
|---|---|---|
| *Governance* | | |
| ESRS 2, GOV-1 | The role of the administrative, supervisory and management bodies | page 44<br>page 81 |
| *IRO* | | |
| ESRS 2, IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities | page 44<br>page 81 |
| G1-1 | Business conduct policies and corporate culture | page 44<br>page 81 |
| G1-2 | Management of relationships with suppliers | Not applicable |
| G1-3 | Prevention and detection of corruption and bribery | Not applicable |
| *Metrics and targets* | | |
| G1-4 | Incidents of corruption or bribery | Not applicable |
| G1-5 | Political influence and lobbying activities | Not applicable |
| G1-6 | Payment practices | Not applicable |

Table 52 – GBL consolidated entity - ESRS disclosure requirements – ESRS G1 – Incorporation by reference

### 7.3.2.5.2 Consolidated governance disclosures – Code of conduct implementation

The table below summarizes the coverage of GBL's consolidated entities by a Code of conduct including a whistleblowing process.

| FY2024 | GBL | Imerys | Affidea | Sanoptis | Canyon | Sienna IM | GBL Consolidated |
|---|---|---|---|---|---|---|---|
| Activity covered by Code of Conduct including whistleblowing process | Yes | Yes | Yes | Yes | Yes | Yes | 100% |

Table 53 – GBL consolidated entity - Code of Conduct & whistleblowing process

## 7.3.2.6 Controlled participations' sustainability statements

As mentioned above (please refer to §7.3.2.2 Consolidated double materiality analysis, page 53), the sustainability statements of GBL's controlled participations prepared on the basis of ESRS requirements are incorporated by reference in accordance with section 9.1 of ESRS 1 in the Appendix of this sustainability statement. Please refer to the table below.

| FY2024 | GBL Consolidated |
|---|---|
| Appendix I - Affidea | page 81 |
| Appendix II - Sanoptis | page 186 |
| Appendix III - Canyon | page 228 |
| Appendix IV - Sienna IM | page 337 |
| Appendix V - Imerys | [§7.4.5] |

Table 54 – GBL consolidated entity – Consolidated entities' sustainability statements

## 7.3.3 Non-controlled participations

### 7.3.3.1 Non-controlled investments' GHG emissions

GBL's GHG emissions are calculated according to the GHG Protocol (2012) under the equity-share methodology. The table below summarizes GHG emissions across GBL's consolidated and non-consolidated entities.

| Entities | Status | NAV | NAV | Detention | Reporting period | Scope 1 | Scope 2 | Scope 3 | Scope 1+2 | Scope 1+2+3 |
|---|---|---|---|---|---|---|---|---|---|---|
| | | EUR million | % | % | FY | t. $CO_2e$ | t. $CO_2e$ | t. $CO_2e$ | t. $CO_2e$ | t. $CO_2e$ |
| *Listed assets* | | | | | | | | | | |
| adidas | Non-consolidated | 1,496 | 9.8% | 3.5% | FY2024 | 20,844 | 114,970 | 6,243,471 | 4,765 | 223,831 |
| SGS | Non-consolidated | 3,501 | 22.9% | 19.1% | FY2024 | 101,320 | 8,117 | 794,582 | 20,939 | 172,965 |
| Pernod Ricard | Non-consolidated | 1,879 | 12.3% | 6.8% | FY2023/24 | 215,330 | 22,659 | 4,366,856 | 16,261 | 314,637 |
| Umicore | Non-consolidated | 391 | 2.6% | 15.9% | FY2024 | 277,717 | 286,349 | 6,467,283 | 89,816 | 1,119,596 |
| Imerys | Consolidated | 1,311 | 8.6% | 54.7% | FY2024 | 1,281,067 | 501,699 | 4,400,448 | 975,534 | 3,383,469 |
| Ontex | Non-consolidated | 138 | 0.9% | 20.0% | FY2024 | 12,748 | 20,049 | 2,437,459 | 6,553 | 493,602 |
| Concentrix | Non-consolidated | 371 | 2.4% | 13.5% | FY2023 | 10,708 | 149,365 | 467,315 | 21,667 | 84,921 |
| *Private assets* | | | | | | | | | | |
| Parques Reunidos | Non-consolidated | 296 | 1.9% | 23.0% | FY2024 | 10,494 | 0 | 253,069 | 2,414 | 60,619 |
| Canyon | Consolidated | 261 | 1.7% | 48.8% | FY2024 | 524 | 98 | 97,839 | 303 | 48,029 |
| Voodoo | Non-consolidated | 302 | 2.0% | 15.6% | FY2023 | 31 | 13 | 45,371 | 7 | 7,071 |
| Affidea | Consolidated | 1,477 | 9.7% | 99.0% | FY2024 | 4,558 | 12,995 | 79,807 | 17,384 | 96,425 |
| Sanoptis | Consolidated | 969 | 6.3% | 83.2% | FY2024 | 2,111 | 2,994 | 33,160 | 4,249 | 31,848 |
| *Alternative assets* | | | | | | | | | | |
| GBL Capital | Non-consolidated | 2,743 | 17.9% | 100.0% | FY2023 | 120,648 | 39,551 | 2,197,453 | 160,199 | 2,357,652 |
| Sienna IM | Consolidated | 137 | 0.9% | 100.0% | FY2024 | 63 | 38 | 8,675,953 | 101 | 8,676,053 |
| *NAV (ESG)* | | *15,270* | | | | | | | | |
| Others | Non-consolidated | 20 | 0.1% | - | - | - | - | - | - | - |
| | | | | | | **Scope 1** | **Scope 2** | **Scope 3 ex-Inv.** | **Scope 3 - Cat, 15 (GHGP)[1]** | **Scope 3 - Cat, 15 (ESRS)** |
| **Total** | **GBL** | **15,290** | **100%** | | **FY2024** | **103** | **7** | **741** | **1,320,192** | **17,070,720** |

Table 55 – GBL GHG emissions – Portfolio level (FY2024)

1 Greenhouse Gas Protocol (2012)

## 7.3.3.2 SBTi coverage

As described in above (please refer to §7.2.2.5 Actions, resources and targets related to climate change, page 28), GBL as a "responsible investor" retained the following target: "SBTi target #2: 100% of eligible portfolio positions with climate strategy and targets aligned with a 1.5°C pathway approved by SBTi by 2030 from a 2020 baseline. For this target, an intermediary target of 66% coverage (vs. 50% initially) by 2025 has been retained". With 78% of GBL's SBTi eligible NAV covered by 1.5°C SBTi-validated targets in FY2024, GBL delivered its intermediary coverage target (66% eligible NAV coverage by 2025) a year in advance. Please refer to the table below for a detailed description portfolio companies' contribution to this objective.

| Entities | CDP score[1] | Physical risk assessment | SBTi Year of commitment | SBTi ambition | SBTi Next revision | GBL SBTi baseline FY2022 | GBL SBTi 2030 target |
|---|---|---|---|---|---|---|---|
| GBL | A | 100% | 2021 | 1.5°C | 2028 | 84%[2] | 78%[3] |
| *Listed assets* | | | | | | | |
| SGS | C | 100% | 2022 | 1.5°C | 2027 | In scope | In scope |
| Pernod Ricard | A | 100% | 2024 | 1.5°C | 2029 | In scope | In scope |
| Adidas | A | 100% | 2021 | 1.5°C | 2026 | In scope | In scope |
| Imerys | A | 100% | 2023 | 1.5°C | 2028 | In scope | In scope |
| Umicore | B | 100% | 2022 | 1.5°C | 2027 | In scope | In scope |
| Concentrix | A- | 100% | 2023 | 1.5°C | 2028 | In scope | In scope |
| Ontex | A | 100% | 2022 | 1.5°C | 2027 | In scope | In scope |
| *Holcim* | | | *2022* | *1.5°C* | *2027* | *In scope* | *Exit in 1H2023* |
| *GEA* | | | *2021* | *1.5°C* | *2026* | *In scope* | *Exit in 4Q2023* |
| *Mowi* | | | *2024* | *1.5°C* | *2029* | *In scope* | *Exit in 1Q2023* |
| *Private assets* | | | | | | | |
| Affidea | No disclosure | 100% | - | - | - | In scope | In scope |
| Sanoptis | No disclosure | 100% | - | - | - | In scope | In scope |
| Canyon | B | 100% | 2024 | 1.5°C | 2029 | In scope | In scope |
| Parques Reunidos | A- | 100% | 2023 | 1.5°C | 2028 | Optional[4] | Out of scope[5] |
| Voodoo | No disclosure | 100% | - | - | - | Optional[4] | Out of scope[5] |
| *Alternative assets* | | | | | | | |
| GBL Capital | GBL | - | - | - | - | Optional[4] | Out of scope[6] |
| Sienna IM | No disclosure | - | 2025 | 1.5°C | 2029 | In scope | In scope |

Table 56 – GBL's SBTi portfolio coverage target

1 CDP Climate Change score 2024
2 SBTi headline target update November 2023: "GBL's portfolio targets cover 84% of its total investment and lending by asset value in 2022. That year, required activities made up 84% of GBL's total investment and lending by asset value while optional activities made up 16%
3 Percentage of eligible portfolio companies with SBTi 1.5°C-validated targets in GBL portfolio as of end of FY2024
4 SBTi Financial Institutions criteria (version 1, 2021) & Private Equity Sector, Science-based target guidance, version 1.0, November 2021
5 Direct private equity: out of scope if level of ownership below 25% AND no board seat position (SBTi guidelines)
6 GBL Capital's LP positions not retained in scope (SBTi guidelines)

# 7.4 Appendix

## 7.4.1 Appendix I - Affidea

### 7.4.1.1 General Information

#### 7.4.1.1.1 Reporting scope and boundaries

**Does the undertaking disclose the general basis used for preparation of its sustainability statements?**

Yes, we provide an understanding of how Affidea prepared its sustainability statement, including the scope of consolidation, the upstream and downstream value chain information and, where relevant, whether we used any of the options for omitting information in the following paragraphs.

**Disclosure of general basis for preparation of sustainability statement**

Affidea's sustainability statement is prepared on a consolidated basis, including all countries in which we operate, all legal entities and locations under our corporate holding company Affidea B.V., same as in our financial reporting parameter for 2024.

**Basis for preparation of sustainability statement (consolidated or individual basis)**

Affidea's sustainability statement is prepared on a consolidated basis.

**Scope of consolidation of consolidated sustainability statement is same as for financial statements**

Yes, scope of consolidation is same as financial statements.

**Indication of subsidiary undertakings included in consolidation that are exempted from individual or consolidated sustainability reporting**

No subsidiaries were exempted or excluded from reporting.

**Disclosure of extent to which sustainability statement covers upstream and downstream value chain**

Our double materiality assessment includes IROs related to our upstream, downstream and own operations related value chain actors. Reporting of our scope 3 GHG emissions includes primary and secondary data from our upstream value chain actors (key global suppliers), and also our downstream transportation (patient commuting for visits to our clinics).
Our consumer and end users related disclosures (ESRS S4) also include data about our downstream value chain.

Affidea's policies, actions, targets and metrics extend exclusively to Affidea, these are not (yet) applied or include all value-chain actors.

**Option to omit specific piece of information corresponding to intellectual property, know-how or results of innovation has been used**

No such omissions.

**Option allowed by Member State to omit disclosure of impending developments or matters in course of negotiation has been used**

No such omissions.

## 7.4.1.1.2 Disclosures in relation to specific circumstances

### Does the undertaking provide information on the effect of specific circumstances related to the preparation of its sustainability statements?

Yes, specific circumstances, where applicable are disclosed in following paragraphs.

### Disclosures in relation to specific circumstances

*See specific disclosures in following paragraphs.*

## 7.4.1.1.3 Specific circumstances related to time horizons

### Medium- or long-term time horizons defined by ESRS 1 have been deviated from

No deviation, our definition of media and long term horizon is same as ESRS 1.

### Disclosure of definitions of medium- or long-term time horizons

We apply the following time intervals as of the end of the reporting period:

a) for the short-term time horizon: the period adopted by Affidea is the same as reporting period in its financial statements;
b) for the medium-term time horizon: from the end of the short-term reporting period defined in (a) up to 5 years; and
c) for the long-term time horizon: more than 5 years.

### Disclosure of reasons for applying different definitions of time horizons

No deviation, our definition of media and long term horizon is same as ESRS 1.

## 7.4.1.1.4 Value chain estimation

### Metrics include value chain data estimated using indirect sources

Yes, there are some metrics that are estimated using indirect data. Their details are in next paragraphs.

### Disclosure of metrics that include value chain data estimated using indirect sources

This will be further confirmed as part of quantified data reporting, but in general the following data is estimated using indirect sources:

a) Impacts, risks & opportunities related to suppliers, and some non-key downstream actors, such as payors & commissiners (e.g. health insurance companies) of our services.
b) Scope 3 greenhouse gas emissions related to category 1, 2 and 9.

### Description of basis for preparation of metrics that include value chain data estimated using indirect sources

The basis for preparation of IROs related to suppliers and payors & commissioners is based on informal discussions and meetings with their representatives and Affidea representatives. Third party sources, such as a strategy consulting company provided information on key trends in healthcare business and requirements of the value chain.

For scope 3 emissions related to category 1 and 2 where possible suppliers were asked to provide their product carbon footprint (PCF), and where no applicable, an spend based estimation was done using industry/ product category specific carbon emission factor.

For scope 3 emissions related to category 9, average number of patient visits and home distance was used to calculate emissions related to their commute to our clinics.

### Description of resulting level of accuracy of metrics that include value chain data estimated using indirect sources

As some of the data for scope 3 emissions is provided through indirect sources, the level of accuracy is not 100%, but the sources used are reliable to a greater extent (e.g. spend based emission factor, data from suppliers product life cycle assessment).

### Description of planned actions to improve accuracy in future of metrics that include value chain data estimated using indirect sources

Affidea will start asking all its major suppliers to provide a Product Carbon Footprint for their products. Where necessary we will also subscribe to a carbon footprint calculator to estimate actual logistics and supply chain emissions.

## 7.4.1.1.5 Sources of estimation and outcome uncertainty

### Disclosure of quantitative metrics and monetary amounts disclosed that are subject to high level of measurement uncertainty

Mainly the scope 3 emissions calculations related to category 1, 2 and 9.

### Disclosure of sources of measurement uncertainty

No measurement uncertainty identified on qualitative metrics, except for the accuracy of indirect data sources for scope 3 emissions calculation.

### Disclosure of assumptions, approximations and judgements made in measurement

No measurement uncertainty identified on qualitative metrics, except for the accuracy of indirect data sources for scope 3 emissions calculation.

## 7.4.1.1.6 Changes in preparation or presentation of sustainability information

### Explanation of changes in preparation and presentation of sustainability information and reasons for them

No changes, this is the first report of Affidea.

### Disclosure of revised comparative figures

No changes, this is the first report of Affidea.

### Disclosure of difference between figures disclosed in preceding period and revised comparative figures

No changes, this is the first report of Affidea.

## 7.4.1.1.7 Reporting errors in prior periods

### Disclosure of nature of prior period material errors

No changes, this is the first report of Affidea.

### Disclosure of corrections for prior periods included in sustainability statement

No changes, this is the first report of Affidea.

### Disclosure of why correction of prior period errors is not practicable

No changes, this is the first report of Affidea.

## 7.4.1.1.8 Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

### Disclosure of other legislation or generally accepted sustainability reporting standards and frameworks based on which information has been included in sustainability statement

ESRS is the basis, no other legislation applied.

### Disclosure of reference to paragraphs of standard or framework applied

ESRS is the basis, no other legislation applied.

### European standards approved by European Standardisation System (ISO/IEC or CEN/CENELEC standards) have been relied on

ESRS is the basis, no other legislation applied.

### Disclosure of extent to which data and processes that are used for sustainability reporting purposes have been verified by external assurance provider and found to conform to corresponding ISO/IEC or CEN/CENELEC standard

Our clinical governance and quality management system policies are regularly audited by external ISO 9001 quality management auditors.

## 7.4.1.1.9 Incorporation by reference

### List of disclosure requirements (DRs) or datapoints (DPs) mandated by a Disclosure Requirement that have been incorporated by reference

Being a privately owned company, Affidea is not obliged to publish any public management or financial reports, so there are no DRs or DPs mandated by any existing disclosure requirement that have been incorporated by reference.

## 7.4.1.1.10 Use of phase-in provisions

### Topics (E4, S1, S2, S3, S4) have been assessed to be material

During our materialty assessment, topical standards ESRS E1, S1, S4 and G1 were identified as material.

### List of sustainability matters assessed to be material (phase-in)

In ESRS S1, contracted staff related disclosures are assessed to be material (phase-in), which will be disclosed in 2025.

### Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)

Being a healthcare services company, Affidea's strategy and business model relies on the availability of qualified medical staff, which is scarce in the European market. To attract and retain talent is one of the top business priorities, and also considered a risk.
Hence, the company offers various possibilities to clinical staff, such as paying not only adequate but most of the time above market wages, opportunities to work on latest technological advancements in diagnostic imaging industry, providing trainings and personal development courses, both inside and outside the company, opportunities to work from home to maintain healthy work-life balance, and depending the role and the country, medical insurance and other kind of benefits, thereby creating a positive impact on such staff.

### Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets

No specific targets are set related to phase-in matters, these will be considered in 2025.

### Description of policies related to sustainability matters assessed to be material (phase-in)

All policies that apply on Affidea staff, are also applicable to contracted staff (phase-in), if and when they work from Affidea premises or use Affidea equipment.

### Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions

No specific actions or material impacts related to phase-in disclosures, other than the ones described earlier.

### Disclosure of metrics related to sustainability matters assessed to be material (phase-in)

No specific metric for phase-in disclosures.

## 7.4.1.1.11 Governance structure and composition

### Does the undertaking disclose the composition of the administrative, management and supervisory (AMS) bodies, their roles and responsibilities and access to expertise and skills with regard to sustainability matters

Yes, information about Affidea's supervisory board, management board and senior leadership team are disclosed in following paragraphs.

### Information about composition and diversity of members of administrative, management and supervisory bodies

Affidea's Supervisory Board (SVB) has 5 members, 4 of which are representatives of the principal shareholder (GBL); each having broad financial, administrative and business management experience in managing/supervising multi-national companies for several years. Out of these 4, 3 have Belgian nationality, and 1 Polish nationality.

One independent SVB member is a Dutch national, who was until recently CEO of a global healthcare and consumer goods company. He has broad experience in leading multi-cultural, high performance teams, with hands-on financial and administrative management expertise, including issues related to compliance and business conduct.

Three members of the supervisory board are part of the audit, risk and compliance committee (ARC), supervising any business conduct related concerns. Two are members of remuneration committee, and all are members of the investment committee.

Affidea's Management Board (MB) consists of the CEO (British national) and CFO (Dutch national), supported by the General Counsel (Swiss national), who acts as the secretary to both the supervisory and management board. The CEO and CFO have vast experience in leading large healthcare companies, including supervising and controlling matters of financial and business conduct.

Affidea's Senior Leadership Team (SLT) comprising the CEO, CFO, Country Managers, and Corporate Function leaders consists of 20 members, including 4 women and 16 men, representing 18 nationalities, living in 15 countries.

### Number of executive members

Number of management board members: 2

Number of supervisory board member: 5

Number of senior leadership team members (top management): 20

### Number of non-executive members

Non-executive supervisory board members: 5

### Information about representation of employees and other workers

Affidea's management board and senior leadership team consists of employees, who represent the interest of broader workers in their functional domain.

### Information about member's experience relevant to sectors, products and geographic locations of undertaking

In additional to the SVB and MB expertise described earlier, all members of the senior leadership team are subject matter experts of their respective field of work.

Country Managers have multi-year experiences in managing healthcare businesses in their respective countries. For details, we refere to our global website: https://www.affidea.com/who-we-are/ownership-leadership?v=1

### Board's gender diversity ratio and other aspects of diversity that the undertaking considers

Percentage of female management board members: 0%

Percentage of female supervisory board member: 0%

Percentage of female senior leadership team members (top management): 20%

### Board independence ratio

20% (1 of the 5 supervisory board members is completely independent, others are representatives of principal shareholder).

## 7.4.1.1.12 Roles and responsibilities of administrative, management and supervisory bodies

### Information about roles and responsibilities of administrative, management and supervisory bodies

Affidea Supervisory Board is responsible for monitoring and oversight of, as well as providing input and advice to, the Management Board, and the wider Affidea Group; but it does not have the power to bind and represent Affidea B.V. (or any other member of the Affidea Group).

Affidea Management Board is responsible for the management of Affidea B.V. and, thereby, the day-to-day management of its subsidiaries comprising the wider Affidea Group, subject to the general oversight of, and relevant approvals required from, the Supervisory Board and GBL Shareholder Interests (as applicable and defined in the Governance Regulations).

### Information about identity of administrative, management and supervisory bodies or individual(s) within a body responsible for oversight of impacts, risks and opportunities

Affidea Group CEO is overall responsible for identifying and managing material impacts, risks and opportunities related to all stakeholders of Affidea.

The day to day responsibilities are delegated to respective functional leaders, such as Governance & Business Conduct related responsibility is delegated to the Country Managers and General Counsel, Staff related responsibilities are delegated to Chief HR Officer, Lenders, Investors & Shareholder engagement responsibility is delegated to the CFO, Consumers & end-users related responsibilities are delegated to Senior Vice President (SVP), Marketing & Communications.

Responsibility for group level ESG reporting and coordination of all ESG matters is delegated to Director of Risk, Assurance and ESG, who has a direct reporting line to the management board and the supervisory board. He has several years of sustainability reporting experience in Affidea and in his prior employment.

### Disclosure on how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies

**The Affidea Governance regulation states that:**
In carrying out their respective roles and responsibilities, the Supervisory Board will:

(i) focus in particular on strategic issues;

(ii) have regard to economic, social, environmental, regulatory, political and other relevant aspects of the Affidea Group's activities which may influence or affect the development of the Affidea Group and the achievement of the Affidea Group Goal; and

(iii) seek to exemplify their expectations for the conduct of the businesses and entities within the Affidea Group and all Affidea Personnel.

**The Affidea Governance regulation states that:**
In carrying out its role and responsibilities, the Management Board will:

(i) operate within the strategic objectives and standards set by the Supervisory Board from time to time; and

(ii) focus on the day-to-day supervisory holding company management of Affidea B.V's subsidiaries comprising the wider Affidea Group.

### Description of management's role in governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities

Senior leadership team and functional management leaders mentioned in earlier disclosures are responsible for identifying and managing material impacts, risks and opportunities related to their respective function or country.

Monitoring of risks and controls is generally performed via the Internal Audits using internal control frameworks for business and clinical risks, managed by the clinical governance and quality, as well as Internal Audit team.

### Description of how oversight is exercised over management-level position or committee to which management's role is delegated to

The supervisory board has a dedicated Audit, Risk & Compliance (ARC) committee, comprising the selected members of the supervisory board, General Counsel and the Director of Risk & Assurance are permanent invitees. The committee reviews any business concerns, risks or audit findings periodically.

### Information about reporting lines to administrative, management and supervisory bodies

The supervisory board has a dedicated Audit, Risk & Compliance (ARC) committee, comprising the selected members of the supervisory board, General Counsel and the Director of Risk & Assurance are permanent invitees. The committee is informed about any business concerns, risks or audit findings periodically.

General Counsel and the Director of Risk & Assurance also regularly gives a report to the management board on audit, risks and compliance matters (board meetings) and have access to all operational data and information from all functions of the company.

### Disclosure of how dedicated controls and procedures are integrated with other internal functions

Affidea has a large set of policies & procedures related to corporate governance, risk management and compliance, including medical quality and safety standards, that are aligned with country medical regulations as well as group standards.
These policies, procedures and standards are fundamental to how we operate our clinics and serve the patients, manage business and operational risks, opportunities and impacts, to ensure high quality diagnostics and patient care.

### Disclosure of how administrative, management and supervisory bodies and senior executive management oversee setting of targets related to material impacts, risks and opportunities and how progress towards them is monitored

Business risks and opportunities are periodically reviewed by the supervisory and management boards. Director of Risk, Assurance and ESG informs about any material changes in risk profile of the company, and effectiveness of internal controls based on internal audits.
Material impacts, risks and opportunities related to sustainaibility matters have also become a regular management and supervisory board meeting topics. In 2024, the supervisory board reviewed and endorsed management board proposal to set ESG targets for 2025, which are based on identified material topics in 2024. Progress on these targets will be monitored and reported in 2025.
No targets were defined for 2024, as Affidea is starting formal ESG reporting for the first time in 2024.

## 7.4.1.1.13 Skills and expertise to oversee sustainability matters

### Disclosure of how administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee sustainability matters

Most of the identified material sustainability matters are related to strategy, business model, operational business processes and people procedures, which are all managed by respective functional/process leaders, who are all subject matter experts in their business domain. For overall coordination of sustainability matters and reporting, Director of Risk, Assurance and ESG is appointed, who has several years of sustainability reporting experience. He monitors and reports progress on sustainability matters and reports any non-conformances directly to the supervisory board.

### Information about sustainability-related expertise that bodies either directly possess or can leverage

Existing functional knowledge and expertise of relavant business function / process owners is leveraged to identify and manage material sustainability matters.

### Disclosure of how sustainability-related skills and expertise relate to material impacts, risks and opportunities

The main functions / processes that were identified as relevant and important for Affidea's sustainability matters are as follows:

1. Marketing and Communications function, for all Consumer & End Users related impacts, risks and opportunities. Senior Vice President (SVP) of marketing and communication was actively involved in consumers and end users related disclosures.
2. HR function, for all workforce related impacts, risks and opportunities. Chief HR Officer and Country HR Directors were actively involved in workforce related disclosures.
3. Operations and Quality functions, for all operational, health and safety related impacts, risks and opportunities. Operations and quality functional leaders were involved in data collection and reporting of health, safety, quality indicators and GHG emissions.
4. Legal function, for Governance, Compliance, Privacy and Administrative matters. General Counsel and Data Processing Officer were involved in related disclosures.

Other functional experts, such as on Strategy, IT, Cyber security were involved on need basis, under the guidance and leadership of Director of Risk, Assurance and ESG.

## 7.4.1.1.14 Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies

### Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them

2024 is the first year of formal ESG reporting, but Affidea started data collection and preparation for ESG reporting since 2023. Director of Risk & Assurance is appointed ESG coordinator at the beginning of 2023, and since then he reports progress on ESG matters regularly to the Management and Supervisory Board.
Several board meetings in 2024 had dedicated discussions on identified material impacts, risks and opportunities, the outcome of these meetings is documented in the minutes.

Formal ESG related due-diligence process is embedded in new acquitions as of October 2024 (ESG considerations in new investments). The effectiveness of this process will be measured in 2025 (too early to measure now).

### Disclosure of how administrative, management and supervisory bodies consider impacts, risks and opportunities when overseeing strategy, decisions on major transactions and risk management process

As a purpose-driven company, at Affidea, we believe it is our responsibility, to create sustainable value for our patients, employees, our partners, the communities we are part of and our shareholders. We invest in innovative and digital solutions to improve our operational efficiency and enhance medical outcomes while offering an outstanding patient experience. Affidea's commitment to responsible and sustainable business practices is embedded in our daily operations and deeply rooted in our culture and business Code of Conduct. In a formal ESG commitment document that was drafted in 2024, the management board has pledged to following commitments:

#### Environmental Commitment:

We aim to minimise our impact on the planet by taking climate action, implementing energy-saving measures, digitising processes to reduce paper usage, implementing waste recycling initiatives, and partnering with suppliers that focus on reducing their and our environmental footprint.

#### Social Commitment:

We create positive social impact by delivering best-in-class services, creating development opportunities for our employees, and engaging with our suppliers and communities beyond healthcare. We foster societal development and support the communities we are part of.

#### Governance commitment:

At Affidea, we uphold our commitment to the highest ethical standards in everything we do. Our governance structure, operating model, ethics framework and robust risk management and internal control processes support this commitment.

In 2024, Affidea also developed and implemented ESG principles, including an ESG considerations framework for new capex / opex spend, that requires any large purchases above management threshold must be assessed in line with the ESG principles, including specific environmental criteria.

### Disclosure of list of material impacts, risks and opportunities addressed by administrative, management and supervisory bodies or their relevant committees

List of material impacts, risks and opportunities was drafted in mid-2024 as part of double materiality assessment. Based on identified material topics, targets are defined for monitoring & reporting in 2025. Other than these, no other topics were addressed in 2024.

### Does the undertaking disclose information on how the AMS bodies are informed about sustainability and how these matters were addressed during the reporting period

Yes, information on how supervisory board, management board and senior leadership team are informed is disclosed in following paragraphs.

### Disclosure of how governance bodies ensure that appropriate mechanism for performance monitoring is in place

Management Board and Senior Leadership Team is tasked by the Supervisory Board to implement ESG targets, as well as to ensure Affidea has a mechanism in place to monitor and report progress on material impacts, risks and opportunities. Progress on these and other topics is monitored in periodic board meetings.

## 7.4.1.1.15 Integration of sustainability-related performance in incentive schemes

### Does the undertaking disclose information about sustainability related performance in incentive schemes (for members of AMS bodies)

No, information on sustainability related performance incentives is not disclosed because no ESG targets were defined for 2024. These are currently under discussion with the remuneration committee of the supervisory board, and will be reported in 2025.
In general, Affidea management and supervisory board are fully aligned and informed on the progress that Affidea has made on sustainability matters since 2023, but as Affidea still has 1 year to formally comply with CSRD, it is considered appropriate to align performance incentives with ESG targets in 2025.

### Incentive schemes and remuneration policies linked to sustainability matters for members of administrative, management and supervisory bodies exist

No targets or performance incentives defined for 2024.

### Description of key characteristics of incentive schemes

No targets or performance incentives defined for 2024.

### Description of specific sustainability-related targets and (or) impacts used to assess performance of members of administrative, management and supervisory bodies

No targets or performance incentives defined for 2024.

### Disclosure of how sustainability-related performance metrics are considered as performance benchmarks or included in remuneration policies

No targets or performance incentives defined for 2024.

### Percentage of variable remuneration dependent on sustainability-related targets and (or) impacts

0.00 %

### Description of level in undertaking at which terms of incentive schemes are approved and updated

No targets or performance incentives defined for 2024.

## 7.4.1.1.16 Information provided in sustainability statement about due diligence process

### Does the undertaking disclose a mapping of the information provided in its sustainability statement about the due diligence process?

Yes, the main aspects and steps of due diligence referred to under ESRS 1 chapter 4 Due diligence are related to a number of cross-cutting and topical Disclosure Requirements under the ESRS. Affidea used that information during the double-materiality assessment process to map its key stakeholders, business activities with the ESRS topics that were found relevant, and then priortised them to arrive at the list of material topics.

For details, see Table below.

### Disclosure of mapping of information provided in sustainability statement about due diligence process

A detailed mapping of Affidea value chain, key business activities, material stakeholders was prepared as part of double-materiality assessment process. Input from key stakeholders and management input was put together to assess all topical sustainability topics listed in AR16 of the ESRS. Based on the results of impact, risks and opportunities assessment, the management board defined a threshold for deciding material topics.

For details, see Table below.

| CORE ELEMENTS OF DUE DILIGENCE | | PARAGRAPHS IN THE SUSTAINABILITY STATEMENT |
|---|---|---|
| a) | Embedding due diligence in governance, strategy and business model | ESRS2.GOV-1, 22a, 22b, [7.4.1.1.12]<br>ESRS2.GOV-2, 26a, [7.4.1.1.14]<br>ESRS2.SBM-3, [7.4.1.1.23] |
| b) | Engaging with affected stakeholders in all key steps of the due diligence | ESRS2.GOV-1, 22d, 23, [7.4.1.1.12]<br>ESRS 2 SBM-2, [7.4.1.1.22]<br>ESRS 2 IRO-1, [7.4.1.1.24] |
| c) | Identifying and assessing adverse impacts | ESRS2.GOV-1, 23b, [7.4.1.1.12]<br>ESRS2.GOV-5, 36a, 36b, [7.4.1.1.17]<br>ESRS2.SBM-3, 48a, [7.4.1.1.23]<br>ESRS 2 IRO-1, [7.4.1.1.24] |
| d) | Taking actions to address those adverse impacts | ESRS2.GOV-2, 26b, [7.4.1.1.14]<br>ESRS2.GOV-5, 36d, [7.4.1.1.17] |
| e) | Tracking the effectiveness of these efforts and communicating | ESRS2.GOV-2, 26a, [7.4.1.1.14] |

## 7.4.1.1.17 Risk management and internal controls over sustainability reporting

### Does the undertaking disclose the main features of its risk management and internal control system in relation to the sustainability reporting process(ess)

Yes, the main features of risk management and internal control system are described in following paragraphs.

### Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting

Affidea has a full-time Risk & Assurance (R&A) function lead by a Director, who has direct reporting line to the supervisory board and management board. The R&A function organises an annual business risk assessment process, in which all Country Managers are asked questions related to past, potential, and existing risks. The results of risk assessment are presented to the supervisory board in a group risk map.

Sustainability reporting is a specific risk in the group risk map, and other material sustainability impacts, risks and opportunities are embedded in various other risks, such as risks related to:

- shortage of qualified medical staff is a workforce related risk,
- personal and sensitive data protection is a consumer and workforce related risk,
- medical malpractice is a consumer safety risk,
- regulatory non-compliance in local markets,
- unethical business practices, including bribery/corruption etc.

Internal controls on sustainability reporting are addressed as follows:
All required quantifiable data is collected bottom-up, i.e. at clinic level, which is then reviewed / verified by a country ESG coordinator, who is either a country quality manager or country nominated representative, such as HR manager. All country level data is then sent to group HR for consistency check, or uploaded in a system for consolidation, which is managed centrally.

## Description of risk assessment approach followed

Group level risks are assessed by all countries, on a scale of likelihood, impact and current controls effectiveness. The factoring of likelihood and impact determines the priority/order of inherent business risks (called gross risks), and factoring the gross risks with current control effectiveness results into residual risks (called net risks) in the risk map. The risks are assessed in detail annually, and high level analysis is performed quarterly.

## Description of main risks identified and their mitigation strategies

The following are top-3 Affidea business, as assessed in the annual risk assessment 2024.

- Lower than expected profit margins.
- Scarcity of medical staff.
- Cyber-attacks.

Three new risks were added in 2024, and one (Covid-19) was removed this year. Of the new, 'Climate change adaptation' is assessed as number 9 in top-10 net risks, indicating that it is an upcoming wider topic that needs mitigation across Affidea.

All the risks and the effectiveness of current mitigation measures was discussed in the supervisory board meeting. Internal Audit performs periodic audits on country business processes, and reports on effectiveness and progress on control implementation.

## Description of how findings of risk assessment and internal controls as regards sustainability reporting process have been integrated into relevant internal functions and processes

Sustainability reporting is a specific risk in the group risk map, and other material sustainability impacts, risks and opportunities are embedded in various other risks, such as risks related to:

- shortage of qualified medical staff is a workforce related risk,
- personal and sensitive data protection is a consumer and workforce related risk,
- medical malpractice is a consumer safety risk,
- regulatory non-compliance in local markets,
- unethical business practices, including bribery/corruption etc.

Most of the identified material sustainability matters are related to strategy, business model, operational business processes and people procedures, which are all managed by respective functional/process leaders, who are all subject matter experts in their business domain. For example, shortage of medical staff, which is considered a top risk is regularly reviewed in the country management board meetings, and actions are planned by group HR and country HR team to maintain a steady pipeline of full-time and part-time doctors, who would like to work for Affidea.

## Description of periodic reporting of findings of risk assessment and internal controls to administrative, management and supervisory bodies

Business risks and opportunities are periodically reviewed by the supervisory and management boards. Director of Risk, Assurance and ESG informs about any material changes in risk profile of the company, and effectiveness of internal controls based on internal audits. Material impacts, risks and opportunities related to sustainability matters have also become a regular management and supervisory board meeting topics.

## 7.4.1.1.18 About the company's activities

### Does the undertaking disclose the elements of its strategy that relate to or impact sustainability matters, its business model and its value chain

Yes, the key elements of Affidea strategy are disclosed in following paragraphs.

### Disclosure of information about key elements of general strategy that relate to or affect sustainability matters

Affidea stands at the forefront of blending access to clinical excellence with a strong commitment to ethical and sustainable practices. By enabling access to high-quality care in an out-of-hospital environment, we actively contribute to the welfare of the communities we serve. The holistic approach we focus on reflects our commitment to nurturing a healthier, more empowered society.

At the heart of Affidea's ethos are the ESG principles, which are captured within five fundamental pillars:

(i) patient access,

(ii) patient choice & experience,

(iii) quality of processes & clinical outcomes,

(iv) culture & employee wellbeing, and

(v) ethical & responsible business conduct.

These 5 pillars are not just the foundation of our ESG strategy but are the guiding lights that illuminate our path to continuous improvement in our non-financial performance. They empower us to measure our ESG outcomes, setting ambitious goals and benchmarks that help us evaluate our impact as a conscientious business entity. The input from stakeholders is clustered into these 5 material topics.

### Description of significant groups of products and (or) services offered

Affidea operates 380 medical centers in 15 countries, and receive approx. 13 million patient visits annually, providing high-quality care in a convenient and accessible manner.

At Affidea, we believe everyone deserves better access to high-quality care.
Our mission is to empower patients to make informed choices for their health and well-being, providing them fast access to a complete integrated care pathway from consultation, laboratory analysis and diagnostic services, in an out-of-hospital setting, close to home. These services are increasingly complemented by out-of-hospital treatment services.

There were no new products / service entries or removals in 2024.

### Description of significant markets and (or) customer groups served

Our existing nucleus of outpatient operations in 15 different markets (namely in: Bosnia & Herzegovina, Croatia, Czech Republic, Greece, Hungary, Ireland, Italy, Lithuania, Poland, Portugal, Romania, Spain, Switzerland, Turkey and the United Kingdom) network benefits, relationship with payors, and brand positioning allow us to export experience from other geographies to all markets.

Many of our markets offer integrated delivery models in three main categories:

(i) community-based polyclinics,

(ii) centers of excellence in different specialties, particularly in orthopaedics, cancer care or neurology, and

(iii) single-specialty, multi-brand clinics.

No new market entries or removals in 2024.

### Description of products and services that are banned in certain markets

None, Affidea is a healthcare service company, providing services legally that are allowed in every jurisdiction.

### Total Revenue/Gross Revenue

1,037,643,000.00 €

## 7.4.1.1.19 Operating sector

### List of ESRS sectors that are significant for undertaking

Not applicable

### List of additional significant ESRS sectors in which significant activities are developed or in which undertaking is or may be connected to material impacts

No

### Undertaking is active in fossil fuel (coal, oil and gas) sector

No

### Undertaking is active in chemicals production

No

### Undertaking is active in controversial weapons

No

### Undertaking is active in cultivation and production of tobacco

No

## 7.4.1.1.20 Sustainability-related goals

### Description of sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders

The following sustainability related goals are identified by Affidea for 2025, in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders:

- Increase digital patient booking system access by 5% YOY across all geographies and customer categories.
- At least 50% of the group wide patients can access their DI report through a digital patient portal.
- 50% of referring doctors are also able to access their patients' DI report through a digital portal.
- Grow number of services within our private premises (polyclinics) to enhance convenience for patients.
- Above 75% patient satisfaction / NPS.
- 80% of patients have their DI scan starting in no later than 30 minutes from their appointment.
- Diagnostic Report availability within 5 days for 90% of DI exams.
- 90% patient feedback responded within 48 hours.

### Disclosure of assessment of current significant products and (or) services, and significant markets and customer groups, in relation to sustainability-related goals

As the sustainability related goals are recently drafted, an analysis of the progress and challenges will be disclosed from 2025.

### Disclosure of elements of strategy that relate to or impact sustainability matters

As the sustainability related goals are recently drafted, an analysis of the progress and challenges will be disclosed from 2025.

## 7.4.1.1.21 About the value chain

### Description of business model and value chain

Affidea business model is based on three main types of customers / payors:

- Public patients, whose healthcare related expenses are paid by the national health services or a public hospital.
- Private insurance patients, whose healthcare related expenses are paid by the private health insurance companies, or other private companies / corporates.
- Out-of pocket private patients, whose healthcare related payments are paid by themselves.

To deliver our services, we identified the following group of stakeholders as part of our upstream, downstream value-chain and own operations:

#### Upstream:

- Global equipment manufacturers or suppliers of related medical systems or spare parts or maintenance services, such as GE, Siemens, Philips etc.
- Country specific local suppliers or distributors of medical / general goods and services.
- Lenders or debt holders provide the necessary capital for growth or continuity of our operations.

#### Downstream:

- Patients and their families
- Referring Doctors
- Payors or commissioners
- Waste collection companies
- General public infrastructure and services

#### Own operations:

- Clinical and non-clinical staff
- Management
- Shareholders and investors

### Description of inputs and approach to gathering, developing and securing inputs

As part of our annual business risk assessment exercise in 2023, and as a preparation for the double-materiality analysis, we formalized the identification & engagement with our key stakeholders to analyze their interests and expectations from Affidea. This was done in a collective manner involving the management board as well as country management.

The first step in our approach for double-materiality assessment was to map our value chain and identify its main actors, to derive the 'key' stakeholders. From the earlier disclosed main actors in our upstream and downstream value chain, following are considered as key stakeholders, whose input informs the business model or strategy of Affidea:

- Patients and their families
- Referring Doctors
- Payors or commissioners
- Clinical and non-clinical staff
- Shareholders and investors

Input from these key stakeholders was collected via existing channels, such as periodic patient satisfaction survey in our clinics, annual referring doctors survey, biennial employee engagement survey, periodic meetings with payors and commissioners and regular meetings with management board, supervisory board (also representing the shareholders).

### Description of outputs and outcomes in terms of current and expected benefits for customers, investors and other stakeholders

The main output or outcome of the value chain assessment was to focus on the material topics, that matter most to the identified key stakeholders. These are exactly the topics that are identified as sustainability related goals (disclosed earlier) from 2025 onwards.

## Description of main features of upstream and downstream value chain and undertakings position in value chain

Following are the groups of stakeholders in Affidea's upstream, downstream value-chain and own operations, and their relationship:

### Upstream:

- Global equipment manufacturers or suppliers of related medical systems or spare parts or maintenance services, such as GE, Siemens, Philips etc.
- Country specific local suppliers or distributors of medical / general goods and services.
- Lenders or debt holders provide the necessary capital for growth or continuity of our operations.

### Downstream:

- Patients and their families, who decide whether they want to take Affidea service.
- Referring Doctors, who is case of diagnostics refer a patient to Affidea.
- Payors or commissioners, who may commission or contract Affidea to provide services.
- Waste collection companies, who help in managing and treating waste from operations.
- General public infrastructure and services, that enables patients and staff to commute to our premises.

### Own operations:

- Clinical and non-clinical staff, who manage Affidea services.
- Management Board, guiding and managing the business and staff.
- Shareholders and investors, providing supervision, and gaining benefits from the activities of business.

### 7.4.1.1.22 Interests and views of stakeholders

## Does the undertaking disclose how the interests and views of its stakeholders are taken into account by the undertaking's strategy and business model(s)

Yes, the following disclosures describe how input from stakeholders is taken into account for our strategy and business model.

## Description of stakeholder engagement

As part of our annual business risk assessment exercise in 2024, and as a preparation for the double-materiality analysis, we formalized the identification & engagement with our key stakeholders to analyze their interests and expectations from Affidea. This was done in a collective manner involving the management board as well as country management.

The first step in our approach for double-materiality assessment was to map our value chain and identify its main actors, to derive the 'key' stakeholders. From the earlier disclosed main actors in our upstream and downstream value chain, following are considered as key stakeholders, whose input informs the business model or strategy of Affidea:

- Patients and their families
- Referring Doctors
- Payors or commissioners
- Clinical and non-clinical staff
- Shareholders and investors

Input from these key stakeholders was collected via existing channels, such as periodic patient satisfaction survey in our clinics, annual referring doctors survey, biennial employee engagement survey, periodic meetings with payors and commissioners and regular meetings with management board, supervisory board (also representing the shareholders).

## Description of key stakeholders

From the earlier disclosed main actors in our upstream and downstream value chain, following are considered as key stakeholders, whose input informs the business model or strategy of Affidea:

- Patients and their families
- Referring Doctors
- Payors or commissioners
- Clinical and non-clinical staff
- Shareholders and investors

## Description of categories of stakeholders for which engagement occurs

Categories of stakeholders for which regular engagement occurs:

- Patients and their families, who decide whether they want to take Affidea service.
- Referring Doctors, who is case of diagnostics refer a patient to Affidea.
- Payors or commissioners, who may commision or contract Affidea to provide services.
- Clinical and non-clinical staff, who manage Affidea services.
- Management Board, guiding and managing the business and staff.
- Shareholders and investors, providing supervision, and gaining benefits from the activities of business.

## Description of how stakeholder engagement is organised

Input from key stakeholders was organised and collected via existing channels, such as periodic patient satisfaction survey in our clinics, annual referring doctors survey, biennial employee enagagement survey, periodic meetings with payors and commissioners and regular meetings with management board, supervisory board (also representing the shareholders).

## Description of purpose of stakeholder engagement

The main purpose of the stakeholder engagement was to gather input, that informs the identification and assessment of material impacts, risks, and opportunities related to sustainability matters.

## Description of how outcome of stakeholder engagement is taken into account

The outcome was analysed and clustered into five ESG pillars, that are the fundamentals of Affidea ESG strategy, and all material sustainability matters are clustered into one of these five pillars:

(i) patient access,

(ii) patient choice & experience,

(iii) quality of processes & clinical outcomes,

(iv) culture & employee wellbeing, and

(v) ethical & responsible business conduct.

## Description of understanding of interests and views of key stakeholders as they relate to undertaking's strategy and business model

A detailed mapping of Affidea value chain, key business activities, material stakeholders was prepared as part of double-materiality assessment process. Input from key stakeholders and management input was put together to assess all topical sustainabiity topics listed in AR16 of the ESRS. Based on the results of impact, risks and opportunities assessment, the management board defined a threshold for deciding material topics.

## Description of amendments to strategy and (or) business model

In the beginning of 2023 Affidea conducted a full strategy review with the help of an external consulting firm (LEK), that performed a thorough analysis of healthcare markets in which Affidea operates, their consumer trends, patient needs and sector challenges.

This detailed strategic review provided insights on where and how Affidea currently plays a role, and where it can make a difference in the lives of millions of healthcare patients and their referring doctors (primary consumers and end user of Affidea are the patients & their families, as well as referring doctors, who refer patients to Affidea and use our diagnostic reports for further analysis and treatments).

Together with monthly patient satisfaction surveys that are conducted regularly in all our clinics, and yearly referring doctor's survey, Affidea identified the key challenges faced by our patients in our operating environment, and adapted its business model to provide more effective OOH (out of hospital) patient care models in multiple Affidea countries in 2024.

Periodic customer surveys / feedback collected from clinics, call center and social media informs the development of new products and services that address patient needs and help identify areas for growth in different regions. This approach ensures Affidea's efforts align with its goal of making healthcare more accessible and inclusive.

### Description of how strategy and (or) business model have been amended or are expected to be amended to address interests and views of stakeholders

Same as previous disclosure.

### Description of any further steps that are being planned and in what timeline

The first step was to define sustaianability related goals, which will be implemented and monitored from 2025.

### Further steps that are being planned are likely to modify relationship with and views of stakeholders

The first step was to define sustaianability related goals, which will be implemented and monitored from 2025. The results of the first goals reporting will determine further steps.

### Description of how administrative, management and supervisory bodies are informed about views and interests of affected stakeholders with regard to sustainability-related impacts

Business risks and opportunities are periodically reviewed by the supervisory and management boards. Director of Risk, Assurance and ESG informs about any material changes in risk profile of the company, and effectiveness of internal controls based on internal audits. Material impacts, risks and opportunities related to sustainaibility matters have also become a regular management and supervisory board meeting topics. In 2024, the supervisory board reviewed and endorsed management board proposal to set ESG targets for 2025, which are based on identified material topics in 2024. Progress on these targets will be monitored and reported in 2025.

## 7.4.1.1.23 Material impacts, risks and opportunities and their interaction with strategy and business model

### Does the undertaking disclose its material impacts, risks and opportunities, resulting from its materiality assessment, and how they interact with its strategy and business model

Yes, the details of double-materiality assessment are disclosed in following paragraphs.

### Description of material impacts resulting from materiality assessment

Summary of Affidea's identified material impacts relate to following topics, more details in the double materiality document:

#### Affidea's potential material 'negative impacts' on stakeholders relate to following categories:

- Non-availability or closure of Affidea clinics, due to climate change or other reasons described in materiality assessment, could result in a direct negative impact on the healthcare delivery to key stakeholders (the patients), and indirect impact on all other stakeholders (e.g. closure of clinics also means less income or opportunities for staff, and less use of medical materials affecting the income of suppliers, and burden on general public healthcare system).
- GHG emissions due to Affidea's own operations, manufacturing and supply of medical equipment and materials, patient and staff commute to clinics causing negative impact on environment.
- Affidea operates in a dynamic, complex, and high workload environment, which can lead to health and safety incidents. Incidents are unintended events that may result or resulted in any harm to patients, personnel or third parties, thereby creating a potential negative impact.
- Affidea collects and processes a large number of staff and patients related personal information. This information is subject to data protection regulations applicable in the country of operations, and Affidea has a responsibility to protect this information, otherwise this may result in potential negative impact on the staff.

#### Affidea's potential 'positive impact' relate mainly towards:

- Improved quality and access of healthcare for patients. Affidea offers a variety of healthcare services to patients, who if Affidea would not exist, would have to wait for long waiting times in the public healthcare system, thereby creating a positive impact on all stakeholder.
- Workforce, that Affidea employs on own payroll, mostly on indefinite / long-term employment contracts, and also a significant number of staff on interim / contract basis, who offer services from Affidea premises. By creating secure and long term employment opportunities for large number of people, Affidea is creating a positive impact on society.
- Affidea offers all staff opportunities for individual and group coaching, mentoring and educational programs, such as leadership courses and bespoke job related trainings for further advancement of their careers, thereby creating a positive impact.

## Description of material risks and opportunities resulting from materiality assessment

Summary of Affidea's material sustainability related risks and opportunities relate to following topics, more details in the double materiality document:

### Risks:

- Loss of revenue if some Affidea clinics have to remain closed for the duration of time when extreme climate impacts us.
- Availability of qualified medical professionals (workforce) is limited in Europe, thereby increasing the wages / costs.
- Risk of higher costs for the company due to the mitigation measures (i.e., purchase of more energy-efficient machinery) needed to be implemented related to the climate change OR due to the new climate directives such as increased taxes on non-renewable energy.
- Environmental fines or higher operating costs due to improper segregation and irresponsible handling / management of different types of waste.
- Risk of health & safety-related incidents resulting in reputational and financial damage for the company.
- Risk of penalties, damaged reputation arising from potential violations of privacy laws and potential privacy incidents related to patients and staff.
- Risk of some employees not adhering to our values and code of conduct, and thereby leading to low productivity, reputational or financial damage (potential fines, and loss of revenue) to the company.

### Opportunities:

- Affidea to review location of all its existing clinics from climate risks perspective, and embed climate risk assessment in the due diligence process of new acquisitions and investments.
- Opportunity to reduce operational expenses as a result of establishing specific and measurable goals related to the progressive use of renewable energy substituting non-renewable along Affidea's value chain and own operations.
- Utilization of Artificial Intelligence can be a financially attractive opportunity for the company, e.g. by making operations more effective and resulting in lower costs.

## Disclosure of current and anticipated effects of material impacts, risks and opportunities on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Management board and delegated functional process owners have processes to manage their respective functional risks, opportunities and impacts. There are no significant effects or changes needed in the business model or strategy of Affidea due to identified impacts, risks or opportunities. If any new risks arise, they are monitored regularly in day to day business, as well as effectiveness of controls is audited during internal and external audits.

## Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment

Summary of Affidea's identified material impacts relate to following topics, more details in the double materiality document:

### Affidea's potential material 'negative impacts' on stakeholders relate to following categories:

- Non-availability or closure of Affidea clinics, due to climate change or other reasons described in materiality assessment, could result in a direct negative impact on the healthcare delivery to key stakeholders (the patients), and indirect impact on all other stakeholders (e.g. closure of clinics also means less income or opportunities for staff, and less use of medical materials affecting the income of suppliers, and burden on general public healthcare system).
- GHG emissions due to Affidea's own operations, manufacturing and supply of medical equipment and materials, patient and staff commute to clinics causing negative impact on environment.
- Affidea operates in a dynamic, complex, and high workload environment, which can lead to health and safety incidents. Incidents are unintended events that may result or resulted in any harm to patients, personnel or third parties, thereby creating a potential negative impact.
- Affidea collects and processes a large number of staff and patients related personal information. This information is subject to data protection regulations applicable in the country of operations, and Affidea has a responsibility to protect this information, otherwise this may result in potential negative impact on the staff.

### Affidea's potential 'positive impact' relate mainly towards:

- Improved quality and access of healthcare for patients. Affidea offers a variety of healthcare services to patients, who if Affidea would not exist, would have to wait for long waiting times in the public healthcare system, thereby creating a positive impact on all stakeholder.
- Workforce, that Affidea employs on own payroll, mostly on indefinite / long-term employment contracts, and also a significant number of staff on interim / contract basis, who offer services from Affidea premises. By creating secure and long term employment opportunities for large number of people, Affidea is creating a positive impact on society.
- Affidea offers all staff opportunities for individual and group coaching, mentoring and educational programs, such as leadership courses and bespoke job related trainings for further advancement of their careers, thereby creating a positive impact.

## Disclosure of how impacts originate from or are connected to strategy and business model

Most of the identified material sustainability matters are related to strategy, business model, operational business processes and people procedures, which are all managed by respective functional/process leaders, who are all subject matter experts in their business domain. For example, shortage of medical staff, which is considered a top risk is regularly reviewed in the country management board meetings, and actions are planned by group HR and country HR team to maintain a steady pipeline of full-time and part-time doctors, who would like to work for Affidea.

## Disclosure of reasonably expected time horizons of impacts

Some impacts are expected to materialize in short term, and some are medium term.

## Description of nature of activities or business relationships through which undertaking is involved with material impacts

Nature of activities or business relationships through which material impacts occur, or could occur are:

- patients and families due to their visit / getting service in our healthcare clinics.
- staff due to their presence and managing / operating our clinics.
- payors and commissioners due to offering a contract to Affidea for performing services.
- suppliers of large medical equipment and local medical material due to our dependence on their equipment / material.
- management and supervisory board due to their respective roles in governance of Affidea.

## Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows and material risks and opportunities for which there is significant risk of material adjustment within next annual reporting period to carrying amounts of assets and liabilities reported in related financial statements

There are no significant financial effects or changes in the financial position of the company due to identified impacts, risks or opportunities. If any new risks arise, they are monitored regularly in day to day business, as well as effectiveness of management controls is audited during internal and external financial audits.

## Disclosure of anticipated financial effects of material risks and opportunities on financial position, financial performance and cash flows over short-, medium- and long-term

There are no significant financial effects or changes anticipated in the financial position of the company due to identified impacts, risks or opportunities. If any new risks arise, they are monitored regularly in day to day business, as well as effectiveness of management controls is audited during internal and external financial audits.

## Information about resilience of strategy and business model regarding capacity to address material impacts and risks and to take advantage of material opportunities

Affidea has a robust management structure in which various subject matter experts from healthcare industry operate and share there industry insights. The strategy and business model was originally incorporated and re-validated in 2023 via an external consultancy company, that brought new insights and reconfirmed management assumptions.
The management board and respective functional leaders monitor developments in the market, and adapt strategic changes, where needed. The supervisory board is always consulted before making any significant startegic changes.

## Disclosure of changes to material impacts, risks and opportunities compared to previous reporting period

This is the first year of reporting.

## Disclosure of specification of impacts, risks and opportunities that are covered by ESRS Disclosure Requirements as opposed to those covered by additional entity-specific disclosures

No other disclosure requirement, only ESRS.

## 7.4.1.1.24 Processes to identify and assess material impacts, risks and opportunities

### Does the undertaking disclose its process to identify its impacts, risks and opportunities and to assess which ones are material?

Yes, the details of double-materiality assessment process are disclosed in following paragraphs.

### Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities

In line with the ESRS criteria (AR16), Affidea performed impact, risk & opportunity (IRO) assessment of each ESRS sustainability topic and (sub) sub-topics.

Based on an internal long list of Affidea material topics, the ESRS topics were assessed first on 'relevance to Affidea' and then for each relevant topic, IROs were determined based on i) the scale, ii) scope, iii) level of irremediability and iv) likelihood of the impact. The consolidated impact score was calculated by combining all factors on a scale of 1 to 5.

Smilarly, financial materiality (based on risk or opportunity) of relevant topics was assessed on a scale of 1 to 5, based on the magnitude and likelihood of risk or opportunity.

The Affidea Management Board, in consultation with the Supervisory Board, decided to include any topics scoring 3 and above on impact or financial materiality, to be material for Affidea.

### Description of process to identify, assess, prioritise and monitor potential and actual impacts on people and environment, informed by due diligence process

The first step in our approach for double-materiality assessment was to map our value chain and identify its main actors, to derive the 'key' stakeholders. From the earlier disclosed main actors in our upstream and downstream value chain, following are considered as key stakeholders, whose input informs the business model or strategy of Affidea:

- Patients and their families
- Referring Doctors
- Payors or commissioners
- Clinical and non-clinical staff
- Shareholders and investors

Input from these key stakeholders was collected via existing channels, such as periodic patient satisfaction survey in our clinics, annual referring doctors survey, biennial employee engagement survey, periodic meetings with payors and commissioners and regular meetings with management board, supervisory board (also representing the shareholders).

### Description of how process focuses on specific activities, business relationships, geographies or other factors that give rise to heightened risk of adverse impacts

The main focus of our assessment was on own operations and downstream activities, because the nature of these activities or business relationships are critical to our business model, and they may give rise to heightened risk of adverse impacts on following stakeholders:

- patients and families due to their visit / getting service in our healthcare clinics.
- staff due to their presence and managing / operating our clinics.
- payors and commissioners due to offering a contract to Affidea for performing services.
- suppliers of large medical equipment and local medical material due to our dependence on their equipment / material.
- management and supervisory board due to their respective roles in governance of Affidea.

### Description of how process considers impacts with which undertaking is involved through own operations or as result of business relationships

Similar to previous disclosure.

### Description of how process includes consultation with affected stakeholders to understand how they may be impacted and with external experts

Consultation with affected key stakeholders was organised and collected via existing channels, such as periodic patient satisfaction survey in our clinics, annual referring doctors survey, biennial employee enagagement survey, periodic meetings with payors and commissioners and regular meetings with management board, supervisory board (also representing the shareholders).

## Description of how process prioritises negative impacts based on their relative severity and likelihood and positive impacts based on their relative scale, scope and likelihood and determines which sustainability matters are material for reporting purposes

In line with the ESRS criteria (AR16), Affidea performed impact, risk & opportunity (IRO) assessment of each ESRS sustainability topic and (sub) sub-topics.
Based on an internal long list of Affidea material topics, the ESRS topics were assessed first on 'relevance to Affidea' and then for each relevant topic, IROs were determined based on i) the scale, ii) scope, iii) level of irremediability and iv) likelihood of the impact. The consolidated impact score was calculated by combining all factors on a scale of 1 to 5.

Smilarly, financial materiality (based on risk or opportunity) of relevant topics was assessed on a scale of 1 to 5, based on the magnitude and likelihood of risk or opportunity.

The Affidea Management Board, in consultation with the Supervisory Board, decided to include any topics scoring 3 and above on impact or financial materiality, to be material for Affidea.

## Description of process used to identify, assess, prioritise and monitor risks and opportunities that have or may have financial effects

Similar to previous disclosure.

## Description of how connections of impacts and dependencies with risks and opportunities that may arise from those impacts and dependencies have been considered

Impacts and Risks are generally connected, this was demonstrated in the double materiality assessement with a unique impact number and related/corresponding risk of opportunity number.

For example: An impact of climate change in some of our regions is that clinics need to be closed for the duration of major climate event. This results in negative impact on patients and healthcare system in general. The related risk for the company and stakeholders is less income due to clinic closure, higher costs of operation to mitigate or adapt to climate change, which can have a ripple effect across value chain: higher costs of care, lower demand for medical materials, creating less opportunities for workers in the value chain etc.

## Description of how likelihood, magnitude, and nature of effects of identified risks and opportunities have been assessed

Affidea enterprise risk management thresholds were applied also on the sustainability risk and opportunities. These are described below:

### Likelihood:

4. ALMOST CERTAIN - This risk WILL materialize at least once within the next 6 months
3. HIGHLY LIKELY - This risk WILL materialize at least once within the next 6-12 months
2. POSSIBLE - This risk MAY materialize at least once within the next 12-24 months
1. REMOTE - This risk MAY materialize at least once within the next 24-36 months

### Financial Impact:

4. CRITICAL - Business continuation or reputation impacted for entire Affidea group, or potential financial impact more than Euro 2 million.
3. SEVERE - Business continuation or reputation impacted in more than one Affidea countries, or potential financial impact between Euro 1-2 million.
2. MODERATE - Business continuation or reputation impacted in one of the Affidea countries, or potential financial impact between Euro 0-1 million.
1. MINOR - Disruption to business continuation in one Affidea country, but no or limited financial impact.

### Current Control:

4. NONE - At this moment, there is No or limited control to mitigate this risk
3. INEFFECTIVE - Controls informal, and not effective (or effectiveness not tested)
2. PARTLY EFFECTIVE - Controls formally in place, but partly effective or not regularly tested
1. EFFECTIVE - Controls formally in place, their effectiveness is regularly tested and found effective

## Description of how sustainability-related risks relative to other types of risks have been prioritised

Sustainability reporting is a specific risk in the group risk map, and other material sustainability impacts, risks and opportunities are embeded in various other risks, such as risks related to:

- shortage of qualified medical staff is a workforce related risk,
- personal and sensitive data protection is a consumer and workforce related risk,
- medical malpractice is a consumer safety risk,
- regulatory non-compliance in local markets,
- unethical business practices, including bribery/corruption etc.

The risks are prioritised based on their impact on the business as well as relevance for sustainability, for e.g. one of the top inherent and net risk identified by management is 'shortage of qualified medical staff', which is both a business risk (less income) as well as sustainability risk (impact on health of general public in Europe).

## Description of decision-making process and related internal control procedures

Business risks and opportunities are periodically reviewed by the supervisory and management boards. Director of Risk, Assurance and ESG informs about any material changes in risk profile of the company, and effectiveness of internal controls based on internal audits. If any changes in strategy or business model are required due to material topics, decisions are taken at the supervisory board level. Material impacts, risks and opportunities related to sustainaibility matters have become a regular management and supervisory board meeting topics.

## Does it disclose an explanation of how the undertaking has determined the material information related to its material impacts, risks and opportunities, including the use of thresholds

In line with the ESRS criteria (AR16), Affidea performed impact, risk & opportunity (IRO) assessment of each ESRS sustainability topic and (sub) sub-topics.

Based on an internal long list of Affidea material topics, the ESRS topics were assessed first on 'relevance to Affidea' and then for each relevant topic, IROs were determined based on i) the scale, ii) scope, iii) level of irremediability and iv) likelihood of the impact. The consolidated impact score was calculated by combining all factors on a scale of 1 to 5.

Similarly, financial materiality (based on risk or opportunity) of relevant topics was assessed on a scale of 1 to 5, based on the magnitude and likelihood of risk or opportunity.

The Affidea Management Board, in consultation with the Supervisory Board, decided to include any topics scoring 3 and above on impact or financial materiality, to be material for Affidea.

## Description of extent to which and how process to identify, assess and manage impacts and risks is integrated into overall risk management process and used to evaluate overall risk profile and risk management processes

Affidea has a full-time Risk & Assurance (R&A) function lead by a Director, who has direct reporting line to the supervisory board and management board. The R&A function organises an annual business risk assessment process, in which all Country Managers are asked questions related to past, potential, and existing risks. The results of risk assessment are presented to the supervisory board in a group risk map.

Sustainability reporting is a specific risk in the group risk map, and other material sustainability impacts, risks and opportunities are embeded in various other risks, such as risks related to:

- shortage of qualified medical staff is a workforce related risk,
- personal and sensitive data protection is a consumer and workforce related risk,
- medical malpractice is a consumer safety risk,
- regulatory non-compliance in local markets,
- unethical business practices, including bribery/corruption etc.

## Description of extent to which and how process to identify, assess and manage opportunities is integrated into overall management process

Business risks and opportunities are periodically reviewed by the supervisory and management boards. Director of Risk, Assurance and ESG informs about any material changes in risk profile of the company, and effectiveness of internal controls based on internal audits. Material impacts, risks and opportunities related to sustainaibility matters have also become a regular management and supervisory board meeting topics.

### Description of input parameters used in process to identify, assess and manage material impacts, risks and opportunities

In the beginning of 2023 Affidea conducted a full strategy review with the help of an external consulting firm (LEK), that performed a thorough analysis of healthcare markets in which Affidea operates, their consumer trends, patient needs and sector challenges.

This detailed strategic review provided insights on where and how Affidea currently plays a role, and where it can make a difference in the lives of millions of healthcare patients and their referring doctors (primary consumers and end user of Affidea are the patients & their families, as well as referring doctors, who refer patients to Affidea and use our diagnostic reports for further analysis and treatments).

A detailed mapping of Affidea value chain, key business activities, material stakeholders was prepared as part of double-materiality assessment process. Input from key stakeholders and management input was put together to assess all topical sustainabiity topics listed in AR16 of the ESRS. Based on the results of impact, risks and opportunities assessment, the management board defined a threshold for deciding material topics.

Together with monthly patient satisfaction surveys that are conducted regularly in all our clinics, and yearly referring doctor's survey, Affidea identified the key challenges faced by our patients in our operating environment, and the outcome was analysed and clustered into five ESG pillars, that are the fundamentals of Affidea ESG strategy, and all material sustainability matters are clustered into one of these five pillars:

(i) patient access,

(ii) patient choice & experience,

(iii) quality of processes & clinical outcomes,

(iv) culture & employee wellbeing, and

(v) ethical & responsible business conduct.

### Description of how process to identify, assess and manage impacts, risks and opportunities has changed compared to prior reporting period

This is the first year of reporting.

## 7.4.1.1.25 Disclosure Requirements included in the undertaking's sustainability statement and of the topics that have been omitted as not material

### Does the undertaking disclose a list of the disclosure requirements compiled for its sustainability statements following an outcome of the materiality assessment

Yes, all disclosure requirements related to general and topical standards ESRS 2, ESRS E1, S1, S4 and G1 are disclosed, in accordance with the results of double materiality assessment.

### Disclosure of list of data points that derive from other EU legislation and information on their location in sustainability statement

No other EU sustainability legislation used, only ESRS

### Disclosure of list of ESRS Disclosure Requirements complied with in preparing sustainability statement following outcome of materiality assessment

Yes, the following paragraphs describe which topical ESRS standards are considered material, and which ones not.

## 7.4.1.1.26 Explanation of negative materiality assessments

### Explanation of negative materiality assessment for ESRS E2 Pollution

Affidea is a healthcare services company, and during its operations or due to its operations, there is no significant / material pollution, as defined in topical ESRS standards is caused.

### Explanation of negative materiality assessment for ESRS E3 Water and marine resources

Affidea is a healthcare services company, and during its operations or due to its operations, there is no significant / material water or marine resources, as defined in topical ESRS standards are utilised.

### Explanation of negative materiality assessment for ESRS E4 Biodiversity and ecosystems

Affidea is a healthcare services company, and during its operations or due to its operations, there is no significant biodiversity or ecosystem is harmed.

### Explanation of negative materiality assessment for ESRS E5 Circular economy

Affidea is a healthcare services company, that does not produce or manufacture any physical products. The principles of circular economy, as defined in topical ESRS standards are not directly relevant to its operations.

### Explanation of negative materiality assessment for ESRS S2 Workers in value chain

Affidea is a healthcare services company, that does not produce or manufacture any physical products. The principles of workers in value chain, as defined in topical ESRS standards are not directly relevant to its operations.

### Explanation of negative materiality assessment for ESRS S3 Affected communities

Affidea is a healthcare services company, that does not produce or manufacture any physical products. The principles of affected communities, as defined in topical ESRS standards are not directly relevant to its operations.

### Explanation of how material information to be disclosed in relation to material impacts, risks and opportunities has been determined

In line with the ESRS criteria (AR16), Affidea performed impact, risk & opportunity (IRO) assessment of each ESRS sustainability topic and (sub) sub-topics.

Based on an internal long list of Affidea material topics, the ESRS topics were assessed first on ‘relevance to Affidea’ and then for each relevant topic, IROs were determined based on i) the scale, ii) scope, iii) level of irremediability and iv) likelihood of the impact. The consolidated impact score was calculated by combining all factors on a scale of 1 to 5.

Similarly, financial materiality (based on risk or opportunity) of relevant topics was assessed on a scale of 1 to 5, based on the magnitude and likelihood of risk or opportunity.

The Affidea Management Board, in consultation with the Supervisory Board, decided to include any topics scoring 3 and above on impact or financial materiality, to be material for Affidea.

## 7.4.1.2 Environmental Information: Climate Change

### 7.4.1.2.1 Integration of climate-related performance in incentive schemes

#### Are the undertakings members of administrative, management and supervisory bodies assessed against GHG reduction targets

Affidea started its ESG journey recently by starting to record and report its operational GHG emissions to its key stakeholders. In 2024 we added new scope 3 categories that were not recorded or reported yet, so we expanded our reporting scope.
However, GHG reduction targets and their link to executive remuneration are not yet formalised. The management board is currently defining the 2025 targets, and they will be addressed in next year's (2025) reporting.
As Affidea is formally not required to be compliant with CSRD in 2024, management is working on a transition plan, which is expected to be ready in mid of 2025.

#### Disclosure of how climate-related considerations are factored into remuneration of members of administrative, management and supervisory bodies

Information on sustainability related performance incentives is not disclosed because no ESG targets were defined for 2024. These are currently under discussion with the the supervisory board, and will be reported in 2025. In general, Affidea management and supervisory board are fully aligned and informed on the progress that Affidea has made on sustainability matters since 2023.

#### Percentage of remuneration recognised that is linked to climate related considerations

As indicated in previous disclosure, no climate related incentives were included in executive compensation in 2024. This will be done in 2025 reporting.

#### Explanation of climate-related considerations that are factored into remuneration of members of administrative, management and supervisory bodies

As indicated in previous disclosure, no climate related incentives were included in executive compensation in 2024. This will be done in 2025 reporting.

### 7.4.1.2.2 Transition plan for climate change mitigation

#### Does the undertaking disclose its plans to ensure that its business model and strategy are compatible with the transition to a sustainable economy

Affidea is working on a transition plan, which is expected to be ready in mid of 2025. In general, Affidea strategy and business model are flexible to adopt market dynamics or sudden changes in a location due to extreme weather events. These will be further aligned and defined in the transition plan.

#### Does the undertaking align to the 1.5 °C Paris Agreement and climate neutrality by 2050?

Affidea is working on a transition plan, which is expected to be ready in mid of 2025. An assessment regarding Paris agreement will be performed and defined in the transition plan.

#### Disclosure of transition plan for climate change mitigation

Affidea is working on a transition plan, which is expected to be ready in mid of 2025. In general, Affidea strategy and business model are flexible to adopt market dynamics or sudden changes in a location due to extreme weather events. Impacts will be further aligned and mitigation measures will be defined in the transition plan.

#### Explanation of how targets are compatible with limiting of global warming to one and half degrees Celsius in line with Paris Agreement

This is the first year of formal reporting so no GHG targets were defined.

#### Disclosure of decarbonisation levers and key action

This is the first year, so no decarbonisation levers or keys actions identified in previous years.

### Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan

This is the first year of reporting, opex and capex required will be detailed in the transition plan, that is under development.

### Explanation of potential locked-in GHG emissions from key assets and products and of how locked-in GHG emissions may jeopardise achievement of GHG emission reduction targets and drive transition risk

This is the first year of formal reporting so no GHG targets or locked-in emissions were analysed.

### Explanation of any objective or plans (CapEx, CapEx plans, OpEx) for aligning economic activities (revenues, CapEx, OpEx) with criteria established in Commission Delegated Regulation 2021/2139

This is the first year of reporting, opex and capex required will be detailed in the transition plan, that is under development.

### Undertaking is excluded from EU Paris-aligned Benchmarks

Affidea's operating sector (healthcare) is not excluded from EU Paris-aligned benchmarks.

### Explanation of how transition plan is embedded in and aligned with overall business strategy and financial planning

Affidea is working on a transition plan, which is expected to be ready in mid of 2025. In general, Affidea strategy and business model are flexible to adopt market dynamics or sudden changes in a location due to extreme weather events. Impacts will be further aligned and mitigation measures will be defined in the transition plan.

### Transition plan is approved by administrative, management and supervisory bodies

Once complete, Affidea's transition plan will be approved by the management board of the companyand endorsed by the supervisory board.

### Explanation of progress in implementing transition plan

Affidea is working on a transition plan, which is expected to be ready in mid of 2025.

### Date of adoption of transition plan for undertakings not having adopted transition plan yet

Affidea was formally not expected to be compliant with CSRD in 2024, but it has taken significant efforts to align with compliance requirements of its principal shareholder. Management is working on a transition plan, which is expected to be ready in mid of 2025.

## 7.4.1.2.3 Material impacts, risks and opportunities and their interaction with strategy and business model

### Does the undertaking asses the resilience of its strategy and business model in relation to climate change

Yes, a climate risk assessment is performed annually with the help of an external company, and also internally as part of business risk assessment, that provides insight on locations that are exposed to physical climate risks. These countries / locations are then asked to periodically update their mitigation plan / resilience, and report it during the country management board meetings.

### Type of climate-related risk

In addition to an external physical climate risks analysis, all Affidea countries participate in an annual business risk assessment, in which among other topics, resilience / mitigation measures against various climate risks is also assessed at country level. Each country manager indicates which climate risks are relevant for their business / locations, the likelihood and potential impact of applicable risks, and the level of control maturity / mitigation measures for each climate risk, indicating the resilience of our business.

## Description of scope of resilience analysis

As explained in previous disclosure, all countries and locations in which Affidea operates are included in the external physical climate risk assessment, as well as in performing the internal business resilience assessment.

The methodology applied for resilience assessment includes the following:

- first a list of potential climate related risks is prepared, that contains following risks: River floods, Earthquakes, Extreme hot summer, Extreme cold winter, Wildfires, Droughts, and Water shortage.
- for each of the potential risks, each country manager assesses whether the identified risk is relevant for their country operations, and if so, what is its likelihood of its materializing, and how much percentage of Affidea assets are potentially exposed to that risk.
- for each of the potential risks, each country manager also assess the financial impact, in case a given risk will materialize in their country. The definition of financial impact aligns with the financial impact defined in our double-materiality assessment and business risk assessment.
- lastly, each applicable risk is assessed on current control measures, i.e. how is Affidea protected from that risks, or in other words what is our resilience if such a risk would materialize.

The results of this climate resilience assessment are presented to the board and also discussed with countries during periodic management discussions.

## Disclosure of how resilience analysis has been conducted

Affidea resilience analysis was done in November 2024, as part of annual business risk assessment . The methodology applied for resilience assessment includes the following:

- first a list of potential climate related risks is prepared, that contains following risks: River floods, Earthquakes, Extreme hot summer, Extreme cold winter, Wildfires, Droughts, and Water shortage.
- for each of the potential risks, each country manager assesses whether the identified risk is relevant for their country operations, and if so, what is its likelihood of its materializing, and how much percentage of Affidea assets are potentially exposed to that risk.
- for each of the potential risks, each country manager also assess the financial impact, in case a given risk will materialize in their country. The definition of financial impact aligns with the financial impact defined in our double-materiality assessment and business risk assessment.
- lastly, each applicable risk is assessed on current control measures, i.e. how is Affidea protected from that risks, or in other words what is our resilience if such a risk would materialize.

## Time horizons applied for resilience analysis

Although the resilience analysis is conducted only in the short term and on an annual basis, Affidea continues and will continue to work on its resilience analysis, in addition to its climate risk analyses (with the latter being the 'input' for the resilience analysis).

That is to say, and to conclude, the detail of the resilience analysis and its time horizon applied for most risks in the resilience analysis is short-term (1 year horizon), as the analysis is done annually and the likelihood of these short-term risks (e.g. river floods or heatwave) can change rapidly over a short period.

## Description of results of resilience analysis

The 2024 physical climate risk indicates that out of a total 411 locations, 49 might be highly exposed to waterscarcity risks by year 2050, 40 might be exposed to heatstress, 10 might be exposed to coastal flooding, 8 might be exposed to heavy rainfall, and 3 might be exposed to windstorm, all by year 2050. Majority of the locations are assessed to be at very low risk.

## Description of ability to adjust or adapt strategy and business model to climate change

In essense, the business model and strategy is flexible to adapt changes related to climate change, when and where needed. The results of the climate risk assessment are reviewed at the supervisory board level. Any material risks or changes needed due to risks are then delagated to the management board and country management, who then executes the changes. The business model and strategy of the affected country is adjusted to reflect / include changes required.

### 7.4.1.2.4 Description of the processes to identify and assess material climate-related impacts, risks and opportunities

## Does the undertaking disclose its process of identifying and assessing material climate-related impacts, risks and opportunities

The process for climate related impact, risk and opportunity assessment was as follows:
As part of Affidea's annual business risk assessment exercise in 2024, and as a preparation for the double-materiality analysis, we formalized the identification & engagement with our key stakeholders to analyze their interests and expectations from Affidea. This was done in a collective manner involving the management board as well as country management. A detailed mapping of Affidea value chain, key business activities, material stakeholders was prepared as part of double-materiality assessment process. Input from key stakeholders and management input was put together to assess all topical sustainability topics listed in AR16 of the ESRS.

For climate assessment, each of the 15 country managers were asked to perform their respective countries climate related impact, risks and opportunities assessment, which was consolidated at group level. Together with the external climate risk assessment, the results were presented to the management board, who defined a threshold for deciding material topics. Summary of Affidea's material climate related impact, risks and opportunities relate to following topics:

### Impacts:

- Non-availability or closure of Affidea clinics, due to climate risks, could result in a direct negative impact on the healthcare delivery to key stakeholders (the patients), and indirect impact on all other stakeholders (e.g. closure of clinics also means less income or opportunities for staff, and less use of medical materials affecting the income of suppliers, and burden on general public healthcare system).
- GHG emissions due to Affidea's own operations, manufacturing and supply of medical equipment and materials, patient and staff commute to clinics causing negative impact on environment.

### Risks:

- Loss of revenue if some Affidea clinics have to remain closed for the duration of time when extreme climate impacts us.
- Risk of higher costs for the company due to the mitigation measures (i.e., purchase of more energy-efficient machinery) needed to be implemented related to the climate change OR due to the new climate directives such as increased taxes on non-renewable energy.

### Opportunities:

- Affidea to review location of all its existing clinics from climate risks perspective, and embed climate risk assessment in the due diligence process of new acquisitions and investments.
- Opportunity to reduce operational expenses as a result of establishing specific and measurable goals related to the progressive use of renewable energy substituting non-renewable along Affidea's value chain and own operations.

## Description of process in relation to impacts on climate change

Affidea's material climate related impact relate to following topics:

- Non-availability or closure of Affidea clinics, due to climate risks, could result in a direct negative impact on the healthcare delivery to key stakeholders (the patients), and indirect impact on all other stakeholders (e.g. closure of clinics also means less income or opportunities for staff, and less use of medical materials affecting the income of suppliers, and burden on general public healthcare system).
- GHG emissions due to Affidea's own operations, manufacturing and supply of medical equipment and materials, patient and staff commute to clinics causes negative impact on environment.

Analysis of GHG emissions: A large majority of Affidea's GHG emissions relate to scope 3: category 1, purchased goods. Although these emissions are estimated based on total spend basis, they represent a category where Affidea relies on the third parties (its suppliers) it does business with. This category will be further analysed in 2025 to identify levers for further reduction of emission, to reduce our environmental impact. The other two categories that contribute the most GHG emissions are related to employee commuting (category 7), and commuting by our patients (category 9). Affidea will propose our staff, and where possible, enable means for them to travel more by public transport rather than own transport reducing the overall emissions. Commuting by patients is calculated based on an estimated distance and commute by own transport, we will analyse this categroy in more detail in 2025.

In 2024, the supervisory board reviewed and endorsed management board proposal to set GHG emission targets for 2025, which is identified a material topic in 2024. Progress on these targets will be monitored and reported in 2025.

## Description of process in relation to climate-related physical risks in own operations and along value chain

Climate risk assessment is performed annually with the help of an external company, and also internally as part of business risk assessment, that provides insight on locations that are exposed to physical climate risks.

Physical climate risks that are considered a risks for some Affidea locations / countries include: coastal flooding, heat stress, heavy rainfall, water scarcity and windstorms. A detailed climate risk exposure assessment is available for each location. The assessment included only Affidea own operations, not the total value chain yet.

A detailed overview of which risks are assessed (or were excluded) during physical climate risks analysis can be found in table Climate Risks below.

**Classification of climate-related hazards**

(Source: Commission delegated regulation (EU) 2021/2139)

| | Temperature-related | Wind-related | Water-related | Solid mass- related |
|---|---|---|---|---|
| Chronic | Changing temperature (air, freshwater, marine water) | Changing wind patterns | Changing precipitation patterns and types (rain, hail, snow/ice) | Coastal erosion |
| | Heat stress | | Precipitation or hydrological variability | Soil degradation |
| | Temperature variability | | Ocean acidification | Soil erosion |
| | Permafrost thawing | | Saline intrusion | Solifluction |
| | | | Sea level rise | |
| | | | Water stress | |
| Acute | Heat wave | Cyclones, hurricanes, typhoons | Drought | Avalanche |
| | Cold wave/frost | Storms (including blizzards, dust, and sandstorms) | Heavy precipitation (rain, hail, snow/ice) | Landslide |
| | Wildfire | Tornado | Flood (coastal, fluvial, pluvial, ground water) | Subsidence |
| | | | Glacial lake outburst | |

**Legend:**

Risk relevant for Affidea, and assessed during physical climate risk analysis.

Risk might be relevant for Affidea, but not assessed during physical climate risk analysis.

Risk is not relevant, and not assessed.

## Climate-related hazards have been identified over short-, medium- and long-term time horizons

Yes, the 2024 physical climate risk indicates that out of a total 411 locations, 49 might be highly exposed to water scarcity risks by year 2050, 40 might be exposed to heat stress, 10 might be exposed to coastal flooding, 8 might be exposed to heavy rainfall, and 3 might be exposed to windstorm, all by year 2050. Majority of the locations are assessed to be at very low risk.

Time horizon applied for most risks in the physical climate risks is medium to long-term (3-5 years or longer horizon), as the potential likelihood of physical risks impacting our clinics is not immediate, and also not all locations are identified to be exposed to physical risks in the short term.

The results of the physical climate risks, and also the internal resilience analysis, are discussed with the management, and based on exposure to a certain risks, a detailed action plan is requested from relevant country management. Main physical risk where Affidea may need an action/resilience plan in short-term is related to river floods, due to presence of our medical centers in major European cities that have rivers.

## Undertaking has screened whether assets and business activities may be exposed to climate-related hazards

Yes, the 2024 physical climate risk indicates that out of a total 411 locations, 49 might be highly exposed to water scarcity risks by year 2050, 40 might be exposed to heat stress, 10 might be exposed to coastal flooding, 8 might be exposed to heavy rainfall, and 3 might be exposed to windstorm, all by year 2050. Majority of the locations are assessed to be at very low risk.

## Short-, medium- and long-term time horizons have been defined

Affidea will continue to work on highlighting more risks in its analyses and evaluating all time horizons, since as of now the analysis is in the medium to long term.
Main physical risk where Affidea may need an action/resilience plan in short-term is related to river floods, due to presence of our medical centers in major European cities that have rivers.

## Extent to which assets and business activities may be exposed and are sensitive to identified climate-related hazards has been assessed

As explained in previous disclosure, all countries and locations in which Affidea operates are included in the external physical climate risk assessment, as well as in performing the internal business resilience assessment.

So to conclude, Affidea has conducted a preliminary exercise, taking into account different climate scenarios and with a time horizon more focused on the long and medium term. Additionally, this analysis considers climate-related hazards for its own operations and all its assets. Affidea will continue to focus on further developing this analysis with different scenarios and also considering the short term.

## Identification of climate-related hazards and assessment of exposure and sensitivity are informed by high emissions climate scenarios

Affidea climate risk assessment was done in June 2024. An external company performed the assessment based on following methodology, as explained in their report:

The Shared Socioeconomic Pathways (SSPs) are a set of scenarios used in climate modeling to explore future socio-economic developments and their impacts on greenhouse gas emissions and climate change. Developed by the scientific community of the Intergovernmental Panel on Climate Change (IPCC), SSPs provide a framework for analysing how different trajectories of economic growth, technological development, population dynamics, and political factors can influence climate outcomes. They are widely recognized and used by the IPCC to support their assessment reports and to facilitate international climate policy discussions.

In the Affidea report, the physical risk assessment is based on the following SSPs:
SSP 5-8.5 (“Fossil-fueled Development”): High economic growth, rapid technological advancements, and heavy reliance on fossil fuels. High greenhouse gas emissions, leading to a significant rise in global temperatures (worst-case scenario). Severe climate impacts, with substantial risks to ecosystems and human societies.
SSP2-4.5 (“Middle of the Road”): Moderate economic growth, balanced approach to energy sources, and gradual technological progress. Intermediate level of emissions, resulting in a moderate increase in global temperatures. Manageable climate risks with potential for adaptation and mitigation, but requires significant policy efforts.

## Explanation of how climate-related scenario analysis has been used to inform identification and assessment of physical risks over short, medium and long-term

In the external climate risk assessment, calculation of exposure to climate risk combines both future change and current hazard. Future change is assessed based on the difference between historical and projected future data, while current hazard is evaluated using historical absolute values. Each of these components is independently rated on a scale from 1 to 5, specific to the risk in question. This dual approach ensures a comprehensive assessment of both present and potential future climate risks. See detailed report for more information on methodology.

In addition to an external physical climate risks analysis, all Affidea countries participate in an annual business risk assessment, in which among other topics, resilience / mitigation measures against various climate risks is also assessed at country level. Each country manager indicates which climate risks are relevant for their business / locations, the likelihood and potential impact of applicable risks, and the level of control maturity / mitigation measures for each climate risk, indicating the resilience of our business.

## Description of process in relation to climate-related transition risks and opportunities in own operations and along value chain

An external company performed Affidea’s transition risk assessment in 2024 using two main scenarios (as explained in their report): the Stated Policies Scenario (STEPS) and the Net Zero Emissions scenario (NZE), from the International Energy Agency.

STEPS Scenario - Existing and scheduled $CO_2$ pricing schemes are reflected in the STEPS, covering electricity generation, industry, energy production sectors and other end-use sectors, e.g. aviation, road transport and buildings, where applicable.

NZE Scenario - In the NZE Scenario, $CO_2$ prices cover all regions and rise rapidly across all advanced economies as well as in prominent emerging market economies with net zero emissions pledges, including China, India, Indonesia, Brazil and South Africa. $CO_2$ prices are lower, but nevertheless rising in other emerging market and developing economies such as North Africa, Middle East, Russia and Southeast Asia (excluding Indonesia). $CO_2$ prices are lower in the remaining developing economies, as it is assumed they pursue more direct policies to adapt and transform their energy systems.

The Net Zero Emissions by 2050 Scenario (NZE Scenario) is a normative scenario that shows a pathway for the global energy sector to achieve net zero $CO_2$ emissions by 2050, with advanced economies reaching net zero emissions in advance of others. This scenario also meets key energy-related Sustainable Development Goals (SDGs), in particular universal energy access by 2030 and major improvements in air quality. It is consistent with limiting the global temperature rise to 1.5 °C (with at least a 50% probability), in line with emissions reductions assessed in the Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report. Source: https://www.iea.org/reports/global-energy-and-climate-model/net-zero-emissions-by-2050-scenario-nze

## Transition events have been identified over short-, medium- and long-term time horizons

Yes, transition risks are identified on a time horizon from 2030 to 2050 with five year intervals.

Time horizon for transition risks: medium and long-term.

## Undertaking has screened whether assets and business activities may be exposed to transition events

Yes, transition events are identified at country level as well as asset level, mainly focusing on potential increase in carbon costs. Other transition events are not assessed in detail.

## Extent to which assets and business activities may be exposed and are sensitive to identified transition events has been assessed

Assessment is predominantly focused on country level carbon costs, based on different scenarios. More detailed transition risk assessment is not yet performed.

## Identification of transition events and assessment of exposure has been informed by climate-related scenario analysis

Assessment is predominantly focused on country level carbon costs, based on different scenarios.

## Assets and business activities that are incompatible with or need significant efforts to be compatible with transition to climate-neutral economy have been identified

High level assessment of transition risk is performed, detailed activities are not yet identified.

## Explanation of how climate-related scenario analysis has been used to inform identification and assessment of transition risks and opportunities over short, medium and long-term

Affidea climate risk assessment was done in June 2024. An external company performed the assessment based on following methodology, as explained in their report:

The Shared Socioeconomic Pathways (SSPs) are a set of scenarios used in climate modeling to explore future socio-economic developments and their impacts on greenhouse gas emissions and climate change. Developed by the scientific community of the Intergovernmental Panel on Climate Change (IPCC), SSPs provide a framework for analysing how different trajectories of economic growth, technological development, population dynamics, and political factors can influence climate outcomes. They are widely recognized and used by the IPCC to support their assessment reports and to facilitate international climate policy discussions.

In the Affidea report, the physical risk assessment is based on the following SSPs:
SSP 5-8.5 ("Fossil-fueled Development"): High economic growth, rapid technological advancements, and heavy reliance on fossil fuels. High greenhouse gas emissions, leading to a significant rise in global temperatures (worst-case scenario). Severe climate impacts, with substantial risks to ecosystems and human societies.
SSP2-4.5 ("Middle of the Road"): Moderate economic growth, balanced approach to energy sources, and gradual technological progress. Intermediate level of emissions, resulting in a moderate increase in global temperatures. Manageable climate risks with potential for adaptation and mitigation, but requires significant policy efforts.

Affidea resilience analysis was done in November 2024, based on the methodology described in previous disclosure.

### Explanation of how climate scenarios used are compatible with critical climate-related assumptions made in financial statements

Affidea climate risk assessment was done in June 2024. An external company performed the assessment based on following methodology, as explained in their report. No financial impact assessment is done so far, and no implications on financial statements was identified during 2024.

The Shared Socioeconomic Pathways (SSPs) are a set of scenarios used in climate modeling to explore future socio-economic developments and their impacts on greenhouse gas emissions and climate change. Developed by the scientific community of the Intergovernmental Panel on Climate Change (IPCC), SSPs provide a framework for analysing how different trajectories of economic growth, technological development, population dynamics, and political factors can influence climate outcomes. They are widely recognized and used by the IPCC to support their assessment reports and to facilitate international climate policy discussions.

In the Affidea report, the physical risk assessment is based on the following SSPs:
SSP 5-8.5 ("Fossil-fueled Development"): High economic growth, rapid technological advancements, and heavy reliance on fossil fuels. High greenhouse gas emissions, leading to a significant rise in global temperatures (worst-case scenario). Severe climate impacts, with substantial risks to ecosystems and human societies.
SSP2-4.5 ("Middle of the Road"): Moderate economic growth, balanced approach to energy sources, and gradual technological progress. Intermediate level of emissions, resulting in a moderate increase in global temperatures. Manageable climate risks with potential for adaptation and mitigation, but requires significant policy efforts.

Affidea resilience analysis was done in November 2024, based on the methodology described in previous disclosure.

## 7.4.1.2.5 Policies to manage its material impacts, risks and opportunities related to climate change mitigation and adaptation

### Is there a climate change adaptation (CCA) or climate change mitigation (CCM) policy

Affidea has high level ESG principles and formal commitment towards climate change is included in it (detailed later), but there is no formal CCA or CCM policy yet. It will be developed in 2025.

### Does the undertaking provide information on its climate change mitigation and adaptation policies?

Affidea has high level ESG principles and formal commitment towards climate change is included in it (detailed below), but there is no formal CCA or CCM policy yet. It will be developed in 2025.

### Policies in place to manage its material impacts, risks and opportunities related to climate change mitigation and adaptation

Affidea performed a formal climate risk analysis through an external agency in 2024 and took actions (e.g. performed a resilience analysis), but it has not yet formalised a climate change mitigation/transition plan and related policies. However, there are some other formal documents that could be considered as our intermediate policies, these are: Formal ESG commitments, ESG guiding principles and ESG considerations in new investments.

### Description of key contents of policy

Affidea's commitment to responsible and sustainable business practices is embedded in our daily operations and deeply rooted in our culture and business Code of Conduct. In a formal ESG commitment document that was drafted in 2024, the management board has pledged to following commitments, that are applicable to all countries and all people working at Affidea:

#### Environmental Commitment:

We aim to minimise our impact on the planet by taking climate action, implementing energy-saving measures, digitising processes to reduce paper usage, implementing waste recycling initiatives, and partnering with suppliers that focus on reducing their and our environmental footprint.

Social Commitment:
We create positive social impact by delivering best-in-class services, creating development opportunities for our employees, and engaging with our suppliers and communities beyond healthcare. We foster societal development and support the communities we are part of.

### Governance commitment:

At Affidea, we uphold our commitment to the highest ethical standards in everything we do. Our governance structure, operating model, ethics framework and robust risk management and internal control processes support this commitment.

In 2024, Affidea also developed and implemented ESG principles, including an ESG considerations framework for new capex / opex spend, that requires any large purchases above management threshold must be assessed in line with the ESG principles, including specific environmental criteria.

## Description of scope of policy or of its exclusions

Affidea commitments, guiding principles and considerations apply to all countries and all legal entities.

## Description of most senior level in organisation that is accountable for implementation of policy

Group CEO, CFO (Management Board), with a delegated responsibility to the senior leadership team (SLT).

## Disclosure of third-party standards or initiatives that are respected through implementation of policy

Affidea guiding principles are inspired from the ESG commitments and targets of other similar sized healthcare companies.

## Description of consideration given to interests of key stakeholders in setting policy

All commitments and guiding principles are defined keeping in mind the interests and expectations of Affidea's key stakeholders.

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

Policies and procedures relevant for Affidea management, staff and shareholders are available on intranet. Policies applicable to external stakeholders (e.g. code of conduct) are also published in the company website.

## Sustainability matters addressed by policy for climate change

As a purpose-driven company, at Affidea, we believe it is our responsibility, to create sustainable value for our patients, employees, our partners, the communities we are part of and our shareholders. We invest in innovative and digital solutions to improve our operational efficiency and enhance medical outcomes while offering an outstanding patient experience. Affidea's commitment to responsible and sustainable business practices is embedded in our daily operations and deeply rooted in our culture and business Code of Conduct. In a formal ESG commitment document that was drafted in 2024, the management board has pledged to following commitments, that are applicable to all countries and all people working at Affidea:

### Environmental Commitment:

We aim to minimize our impact on the planet by taking climate action, implementing energy-saving measures, digitizing processes to reduce paper usage, implementing waste recycling initiatives, and partnering with suppliers that focus on reducing their and our environmental footprint.

### Social Commitment:

We create positive social impact by delivering best-in-class services, creating development opportunities for our employees, and engaging with our suppliers and communities beyond healthcare. We foster societal development and support the communities we are part of.

Governance commitment:

At Affidea, we uphold our commitment to the highest ethical standards in everything we do. Our governance structure, operating model, ethics framework and robust risk management and internal control processes support this commitment.

In 2024, Affidea also developed and implemented ESG principles, including an ESG considerations framework for new capex / opex spend, that requires any large purchases above management threshold must be assessed in line with the ESG principles, including specific environmental criteria.

### Disclosure of reasons for not having adopted policies

Climate change is identified as a material topic in 2024, and management has already started taking actions, such as defining Affidea ESG commitments, key ESG principles, ESG related investment considerations, and also performing a detailed climate risk and resilience analysis. A more specific policy will be drafted in 2025.

## 7.4.1.2.6 Actions and Resources related to climate change mitigation and adaptation

### Disclosure of key action

Key actions taken in 2024 were: a thorough climate risk analysis, and related resilience analysis.

### Description of scope of key action

All Affidea countries and locations were assessed on physical climate risks, and resilience analysis was performed at country level.

### Time horizon under which key action is to be completed

Resilience analysis will be performed annually, so the next one will be in end of 2025.

### Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

As explained in previous disclosure, all countries and locations in which Affidea operates are included in the external physical climate risk assessment, as well as in performing the internal business resilience assessment.

The methodology applied for resilience assessment includes the following:

- first a list of potential climate related risks is prepared, that contains following risks: River floods, Earthquakes, Extreme hot summer, Extreme cold winter, Wildfires, Droughts, and Water shortage.
- for each of the potential risks, each country manager assesses whether the identified risk is relevant for their country operations, and if so, what is its likelihood of its materializing, and how much percentage of Affidea assets are potentially exposed to that risk.
- for each of the potential risks, each country manager also assess the financial impact, in case a given risk will materialize in their country. The definition of financial impact aligns with the financial impact defined in our double-materiality assessment and business risk assessment.
- lastly, each applicable risk is assessed on current control measures, i.e. how is Affidea protected from that risks, or in other words what is our resilience if such a risk would materialize.

The results of this climate resilience assessment are presented to the board and also discussed with countries during periodic management discussions.

### Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

This will be developed in 2025, as part of formalising the transition plan.

### Disclosure of the type of current and future financial and other resources allocated to the action plan

This will be developed in 2025, as part of formalising the transition plan.

### Does the undertaking disclose information regarding its climate change mitigation and adaption actions

These will be disclosed in 2025, after the transition plan has been formalised.

### Does the undertaking provide information related to resources allocated to the implementation of actions

These will be disclosed in 2025, after the transition plan has been formalised.

### Decarbonisation lever type

Climate change is identified as a material topic in 2024, and management has already started taking actions, such as defining Affidea ESG commitments, key ESG principles, ESG related investment considerations, and also performing a detailed climate risk and resilience analysis. A more specific policy and related measurable actions will be drafted in 2025.

### Achieved and expected GHG emission reductions

These will be disclosed in 2025, after the transition plan has been formalised.

### Disclosure of reasons for not having adopted actions

Climate change is identified as a material topic in 2024, and management has already started taking actions, such as defining Affidea ESG commitments, key ESG principles, ESG related investment considerations, and also performing a detailed climate risk and resilience analysis. A more specific policy and related measurable actions will be drafted in 2025.

## 7.4.1.2.7 Targets related to GHG emissions reduction

### Does the undertaking disclose its GHG emission reduction targets

Targets will be defined from 2025 onwards, based on the emissions that will be reported for 2024, so no reporting of targets for 2024.

### If so, does the undertaking disclose whether and how it has set GHG emission reduction targets

Targets will be defined from 2025 onwards, based on the emissions that will be reported for 2024, so no reporting of targets for 2024.

### Disclosure of how GHG emissions reduction targets and (or) any other targets have been set to manage material climate-related impacts, risks and opportunities

Climate change is identified as a material topic in 2024, and management has already started taking actions, such as defining Affidea ESG commitments, key ESG principles, ESG related investment considerations, and also performing a detailed climate risk and resilience analysis. A more specific policy and related measurable actions will be drafted in 2025.

### Explanation of how consistency of GHG emission reduction targets with GHG inventory boundaries has been ensured

Targets will be defined from 2025 onwards, based on the emissions that will be reported for 2024, so no reporting of targets for 2024.

### GHG emission reduction target is science based and compatible with limiting global warming to one and half degrees Celsius

Targets will be defined from 2025 onwards, based on the emissions that will be reported for 2024, so no reporting of targets for 2024.

### Description of expected decarbonisation levers and their overall quantitative contributions to achieve GHG emission reduction target

Targets will be defined from 2025 onwards, based on the emissions that will be reported for 2024, so no reporting of targets for 2024.

### Description of how it has been ensured that baseline value is representative in terms of activities covered and influences from external factors

Targets will be defined from 2025 onwards, based on the emissions that will be reported for 2024, so no reporting of targets for 2024.

### Description of how new baseline value affects new target, its achievement and presentation of progress over time

Targets will be defined from 2025 onwards, based on the emissions that will be reported for 2024, so no reporting of targets for 2024.

### Diverse range of climate scenarios have been considered to detect relevant environmental, societal, technology, market and policy-related developments and determine decarbonisation levers

Targets will be defined from 2025 onwards, based on the emissions that will be reported for 2024, so no reporting of targets for 2024.

### Disclosure of past progress made in meeting target before current base year

Targets will be defined from 2025 onwards, based on the emissions that will be reported for 2024, so no reporting of targets for 2024.

## 7.4.1.2.8 Description of reasons why there are no plans to set measurable outcome-oriented targets

### Effectiveness of policies and actions is tracked in relation to material sustainability-related impact, risk and opportunity

Targets will be defined from 2025 onwards, based on the emissions that will be reported for 2024, so no reporting of targets for 2024.

### Description of defined level of ambition to be achieved and of any qualitative or quantitative indicators used to evaluate progress

Targets will be defined from 2025 onwards, based on the emissions that will be reported for 2024, so no reporting of targets for 2024.

## 7.4.1.2.9 Energy consumption and mix

### Does the undertaking provide an understanding of the absolute energy consumption, energy intensity, improvement in energy efficiency and share of renewable and nonrenewable energy in its overall energy mix

Total energy consumption and energy intensity is disclosed as part of GHG emissions, further detailed analysis on energy efficiency and share of renewables will be performed in 2025.

### Total energy consumption related to own operations

83,320 MWh

### Energy consumed, by source

| Energy Source | Total amount of energy consumed from energy source (MWh) | Percentage of total energy consumption |
|---|---|---|
| Fossil sources | 83,320 | 100 |
| Nuclear sources | Not all locations have insight in their energy mix yet | Not all locations have insight in their energy mix yet |
| Renewable sources | Not all locations have insight in their energy mix yet | Not all locations have insight in their energy mix yet |

### Total energy consumption from activities in high climate impact sectors

No business activities in high climate impact sectors.

## Fuel consumed, by source

| Fuel Source | Total fuel MWh consumed by the organization |
|---|---|
| Fuel consumption from renewable sources | 0 |
| Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources | 62,763 |
| Fuel consumption from coal and coal products | Not all locations have insight in their source of fuel yet |

## Total GHG emissions in metric tonnes of $CO_2$eq

Yes, the total GHG emissions are disclosed in Table below.

| | Retrospective | | Milestones and target years | | | | | |
|---|---|---|---|---|---|---|---|---|
| | **Base year (2024)** | **Comparative** | **N** | **% N / N-1** | **2025** | **2030** | **2050** | **Annual % target / Base year** |
| **Scope 1 GHG emissions** | | | | | | | | |
| Gross Scope 1 GHG emissions ($tCO_2$eq) | **4,557.59** | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%) | 0.00 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| **Scope 2 GHG emissions** | | **N/A** | **N/A** | **N/A** | **To be defined** | **To be defined** | **To be defined** | |
| Gross location-based Scope 2 GHG emissions ($tCO_2$eq) | **12,995.15** | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| Gross market-based Scope 2 GHG emissions ($tCO_2$eq) | 12,995.15 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| **Significant scope 3 GHG emissions** | | **N/A** | **N/A** | **N/A** | **To be defined** | **To be defined** | **To be defined** | |
| Total Gross indirect (Scope 3) GHG emissions ($tCO_2$eq) | **79,807.40** | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 1. Purchased goods and services | 51,953.12 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 2. Capital goods | 3,649.82 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 3. Fuel and energy-related activities (not included in Scope 1 or Scope 2) | 5,224.64 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 4. Upstream transportation and distribution | included in 1 & 2 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 5. Waste generated in operations | 688.41 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 6. Business traveling | 666.82 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 7. Employee commuting | 8,527.87 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 8. Upstream leased assets | included in 2 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 9. Downstream transportation | 9,096.73 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 10.Processing of sold products | N/A | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 11. Use of sold products | N/A | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 12. End-of-life treatment of sold products | N/A | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 13. Downstream leased assets | N/A | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 14. Franchises | N/A | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| 15. Investments | N/A | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| **Total GHG emissions** | **97,360.14** | **N/A** | **N/A** | **N/A** | **To be defined** | **To be defined** | **To be defined** | |
| Total GHG emissions (location-based) ($tCO_2$eq) | 97,360.14 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |
| Total GHG emissions (market-based) ($tCO_2$eq) | 97,360.14 | N/A | N/A | N/A | To be defined | To be defined | To be defined | |

## For Scope 1 and Scope 2 emissions disclosed the undertaking shall disaggregate the information, separately disclosing emissions from: (a) the consolidated accounting group and (b) investees

Affidea does not have invested companies, such as associates, joint ventures or non-consolidated subsidiaries that are not fully consolidated in the financial statements of the consolidated accounting group, as well as contractual agreements that are not structured through an entity (i.e. jointly controlled operations and assets), for which it has operational control. All emissions are related to consolidated group entities, and all locations where Affidea operated/had full control in 2024 are included in emission calculations.

### 7.4.1.2.10 Calculation Methodology

## Disclosure of methodologies, significant assumptions and emissions factors used to calculate or measure GHG emissions

#### The methodology applied for calculation of GHG emissions is as follows:
#### Scope 1 and 2:

Data is collected from own operational sources, such as i.e. fuel consumption, gas consumption and electricity consumption. Every Affidea location collects and provides required data per indicator in a pre-defined excel template, which is uploaded in a consolidation system. This system mainly 'consolidates' all location numbers into a consolidated country number, and also applies/multiplies with a DEFRA emission factor per indicator to arrive at emissions for each indicator at country and group level.

#### Scope 3:

Data is partly collected from own operational sources, such as business travel, waste, and employees commuting. Related emission factors were multiplied to the total units of measurement (UOM) to calculate the total emissions. For the remaining Scope 3, DEFRA WTT emission factors were used, or where no data is available an estimation is made, for example total emissions of purchased goods, capital goods, consumers commute (downstream transportation) is calculated using spend method or approximate number of patients, multiplied by average home distance using emission factors of private mid-size vehicle.

#### Details per Scope 3 category:

**Category 1:** Purchased Goods
This is a spend based calculation, which is derived from the amount Affidea spent in 2024 on various medical/pharmaceutical materials/goods. For calculation of emissions, we used a DEFRA/Climatiq emission factor for various types of pharmaceutical products or service. Where relevant, we first converted Affidea spend from Euro to UK pounds or to Canadian Dollars and then multiplied it with emission factor. The spend amount is only available at group level.

**Category 2:** Capital Goods
This is based on the actual number of capital goods (medical equipment) acquired or leased by Affidea in 2024 and their emission number provided by the suppliers during manufacturing, packaging and delivering / transporting them. We used the list of equipment purchased or leased from our main suppliers: GE, Philips and Siemens, who provided emissions per equipment. We took the average emissions of all types equipment and multiplied with total number of equipment to arrive at overall emissions of Capital Goods and Upstream Leased Assets (Category 8).
**Category 3:** Fuel and Energy Related activities not included in scope 1 and 2
We have used DEFRA WTT (Well to Tank) and T&D (Transmission and Distribution) emission factors and multiplied by actual fuel, energy and gas consumption.

**Category 4:** Upstream transportation
This is already included in the emissions of Category 1 and 2.

**Category 5, 6 and 7:**
These are also based on actual data received from our own operations, multiplied by relevant DEFRA emission factors.

**Category 8:** Upstream leased assets
This is already included in the emissions of Category 2, because some of the large medical equipment is leased.

**Category 9:** Downstream transportation
This is the estimated transportation of our patients (approx. 10.8 million), who visit the clinics from an average distance of 5 kms (estimate), using their own vehicle (also an estimate, but on higher side, as many patients also visit by public transport). We used the DEFRA private mid-size car emission factors to arrive at total emissions considering that majority of patients come from middle-class families.

## Biogenic emissions of $CO_2$ from the combustion or bio-degradation of biomass not included in Scope 1 GHG emissions

No biogenic emissions.

## Disclosure of types of contractual instruments, Scope 2 GHG emissions

No contractual instruments.

## Percentage of GHG Scope 3 calculated using primary data

19 %

## Disclosure of why Scope 3 GHG emissions category has been excluded

**Category 10:** Processing of Sold Products is not relevant because Affidea is a service company, so only emissions are consumer travel, no other processing of services.
**Category 11:** Use of Sold Products is not relevant because Affidea is a service company, no products are manufactured or sold.
**Category 12:** End-of-Life Treatment of Sold Products is not relevant because no products manufactured or sold, we are a service company.
**Category 13:** Downstream Leased Assets is not relevant because no products are leased to consumers.
**Category 14:** Franchises are also not relevant because Affidea does not run any franchises.
**Category 15:** Investments are also not relevant because Affidea does not make any equity investments.

## List of Scope 3 GHG emissions categories included in inventory

**Category 1:** Purchased Goods and Services
**Category 2:** Capital Goods
**Category 3:** Fuel- and Energy-Related Activities Not Included in Scope 1 or Scope 2
**Category 4:** Upstream Transportation and Distribution
**Category 5:** Waste Generated in Operations
**Category 6:** Business Travel
**Category 7:** Employee Commuting
**Category 8:** Upstream Leased Assets
**Category 9:** Downstream Transportation and Distribution

## Disclosure of reporting boundaries considered and calculation methods for estimating Scope 3 GHG emissions

Reporting boundaries for own operations was limited to entities fully owned, operated and consolidated in Affidea group results. Scope 3 categories 1 and 2 are calculated based on spend analysis. DEFRA emission factors are used for calculation of remaining categories.

## Disclosure of significant changes in definition of what constitutes reporting undertaking and its value chain and explanation of their effect on year-to-year comparability of reported GHG emissions

This is the first year of formal reporting so no comparison with previous year.

### 7.4.1.2.11 GHG emissions intensity

#### GHG emissions intensity, location-based (total GHG emissions per net revenue)

0.093

#### GHG emissions intensity, market-based (total GHG emissions per net revenue)

0.093

#### Disclosure of reconciliation to financial statements of net revenue used for calculation of GHG emissions intensity

Net revenue is same as used in financial reporting.

#### Disclosure of reconciliation to relevant line item or notes in financial statements of net revenue amounts

Net revenue is same as used in financial reporting.

#### Net revenue

1,037,643,000.00 EUR

#### Net revenue used to calculate GHG intensity

1,037,643,000.00 EUR

#### Net revenue other than used to calculate GHG intensity

No other revenue than what is used for calculating the GHG emissions.

### 7.4.1.2.12 GHG mitigation projects financed through carbon credits

#### Disclosure of GHG emission reductions or removals from climate change mitigation projects outside value chain financed or to be financed through any purchase of carbon credits

Not applicable

#### Carbon credits are used

Not applicable

#### Explanation of scope, methodologies and frameworks applied and how residual GHG emissions are intended to be neutralised

Not applicable

#### Public claims of GHG neutrality that involve use of carbon credits have been made

Not applicable

#### Public claims of GHG neutrality that involve use of carbon credits are accompanied by GHG emission reduction targets

Not applicable

### Explanation of how public claims of GHG neutrality that involve use of carbon credits are accompanied by GHG emission reduction targets

Not applicable

### Claims of GHG neutrality and reliance on carbon credits neither impede nor reduce achievement of GHG emission reduction targets or net zero target

Not applicable

### Explanation of how claims of GHG neutrality and reliance on carbon credits neither impede nor reduce achievement of GHG emission reduction targets or net zero target

Not applicable

### Type of carbon credits from removal projects

Not applicable

### Explanation of credibility and integrity of carbon credits used

Not applicable

### Disclosure of extent of use and quality criteria used for carbon credits

Not applicable

## 7.4.1.2.13 Internal carbon pricing

### Carbon price applied for each metric ton of greenhouse gas emission

Not applicable

### Description of specific scope of application of carbon pricing scheme

Not applicable.

### Description of critical assumptions made to determine carbon price applied

Not applicable.

### Disclosure of how carbon price used in internal carbon pricing scheme is consistent with carbon price used in financial statements

Not applicable.

## 7.4.1.2.14 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

### Disclosure of risk factors for net revenue from business activities at material physical risk

Phased-in disclosure.

### Disclosure of magnitude of anticipated financial effects in terms of margin erosion for business activities at material physical risk

Phased-in disclosure.

### Disclosure of reconciliations with financial statements of significant amounts of assets and net revenue at material physical risk

Phased-in disclosure.

### Disclosure of reconciliations with financial statements of significant amounts of assets, liabilities and net revenue at material transition risk

Phased-in disclosure.

### Disclosure of how anticipated financial effects for assets and business activities at material physical risk have been assessed

Phased-in disclosure.

### Disclosure of how assessment of assets and business activities considered to be at material physical risk relies on or is part of process to determine material physical risk and to determine climate scenarios

Phased-in disclosure.

### Disclosure of how potential effects on future financial performance and position for assets and business activities at material transition risk have been assessed

Phased-in disclosure.

### Disclosure of how assessment of assets and business activities considered to be at material transition risk relies on or is part of process to determine material transition risks and to determine scenarios

Phased-in disclosure.

## 7.4.1.3 Social Information: Own Workforce

### 7.4.1.3.1 Interests and views of stakeholders

#### How is the undertaking's strategy and business model(s) influenced by its interests, views, right and expectations of (actually and potentially) materially affected own workers, including respect for their human (including labour) rights

Being a healthcare services company, Affidea's strategy and business model relies on the availability of qualified medical staff, which is scarce in the European market. To attract and retain talent is one of the top business priorities, and also considered a risk. Hence, the company offers various possibilities to clinical staff, such as paying not only adequate but most of the time above market wages, opportunities to work on latest technological advancements in diagnostic imaging industry, providing trainings and personal development courses, both inside and outside the company, opportunities to work from home to maintain healthy work-life balance, and depending the role and the country, medical insurance and other kind of benefits, etc.

Depending on the country and type of employment, Affidea employees are consulted on working conditions, wages, working time etc. in accordance with local labour regulations, and where applicable through their works council, thereby empowering them and offering the opportunity to have a say in their employment, and creating a positive impact on working conditions.

Having access to healthcare is a fundamental human right, which is the main reason why Affidea exist. Hence, commitment to human rights is central to Affidea's operations, ensuring equitable access to healthcare, protecting patient privacy, and upholding individual dignity. This principle guides not only how Affidea delivers care but also which type of services it adds to its portfolio in different regions.

### 7.4.1.3.2 Material impacts, risks and opportunities and their interaction with strategy and business model

#### Do actual and potential impacts on own workers originate from, are connected to, or influence the undertaking's strategy and business model(s)? How does it inform and contribute to adapting undertaking's strategy and business model

Affidea's strategy and business model significantly relies on availability of qualified medical staff, and their health, safety and wellbeing while working at Affidea. Most of our impacts, risks and opportunities related to workforce revolve around these themes.

As a purpose and people driven company, at Affidea, we believe it is our responsibility, to create sustainable value for our patients, employees, our partners, the communities we are part of and our shareholders. We invest in innovative and digital solutions to improve our operational efficiency and enhance medical outcomes while offering an outstanding patient experience. Our management has pledged to the following ESG commitments, that includes caring for the people/workforce that drives Affidea:

##### Environmental Commitment

We aim to minimise our impact on the planet by taking climate action, implementing energy-saving measures, digitising processes to reduce paper usage, implementing waste recycling initiatives, and partnering with suppliers that focus on reducing their and our environmental footprint.

##### Social Commitment

We create positive social impact by delivering best-in-class services, creating development opportunities for our employees, and engaging with our suppliers and communities beyond healthcare. We foster societal development and support the communities we are part of.

##### Governance commitment

At Affidea, we uphold our commitment to the highest ethical standards in everything we do. Our governance structure, operating model, ethics framework and robust risk management and internal control processes support this commitment.

## Does it describe a relationship between its material risks and opportunities arising from impacts and dependencies on own workforce and its strategy and business model(s)

As identified in the double materiality assessment, Affidea's material risks & opportunities are directly related to the identified impacts and dependencies on the availability and treatment of its workforce. Some examples of inter-relation between IROs is presented here, more details can be found in double materiality assessment:

Affidea employs a large number of employees on own payroll, mostly on indefinite / long-term employment contracts, and also a significant number of staff on interim / contract basis, who offer services from Affidea premises. We create secure employment opportunities for large number of people, thereby creating a positive impact. The related risk for the company is that availability of qualified medical professionals is limited in Europe, and if we do not have sufficient staff, it could result in longer reporting times to our patients, deterioration of the quality of medical reports and therefore potential financial losses to the company.

Affidea offers all staff opportunities for individual and group coaching, mentoring and educational programs, such as leadership courses and bespoke job related trainings for further advancement of their careers, thereby creating a positive impact. Risk of higher staff turnover, deterioration of staff skills/ knowledge and referral doctors' satisfaction if company stops to provide regular training and skill development for its staff.

Affidea operates medical devices, some of which require high precision under stressful circumstances. Inappropriate or prolonged use of such equipment may affect the health and safety of staff, thereby creating a potential negative impact. Risk of health & safety-related incidents resulting in reputational and financial damage for the company.

Affidea has a structured governance model, two-tier board structure, documented code of conduct, and open culture with regards to communication and adherence to our corporate values (our company name itself signifies our three values, Affinity, Fidelity, and Idea). Our staff is encouraged to raise concerns or complaints regarding non-adherence to values or code of conduct, thereby empowering them and creating a positive impact on own workforce. The related risk is that some employees may not adhere to our values and code of conduct and can engage in a bribery or corruption event, or potential other regulatory incidents (e.g. data breach), thereby leading to reputational and/or financial damage for the company.

Affidea adheres to the statutory working times for medical professionals in accordance with the regulations in country of operations. We have a right to disconnect policy that encourages people not to respond to emails beyond working hours. Risk related to not ensuring work-life balance to our staff is staff burnout and therefore risk of higher costs for the company due to the need of finding replacement/ reorganization of work.

## All people in its own workforce who can be materially impacted by undertaking are included in scope of disclosure under ESRS 2

Yes, all people in Affidea's workforce (full-time employees, part-time employees, interim staff, and contractors) are included in scope of disclosure under ESRS2.

## Description of types of employees and non-employees in its own workforce subject to material impacts

During Affidea's double-materiality assessment, we considered all types of employees and non-employees (full-time, part-time, temporary, permanent, contracted or own payroll) for any potential impact, risk or opportunity related to their relationship with Affidea. Characteristics of our workforce including numbers per type of employee are disclosed in respective AR/DRs later in this document, or separately provided in a table.

## Material negative impacts occurrence (own workforce)

Following are instances of potential negative impact, that were identified during the double-materiality assessment. As required in this disclosure requirement, we have indicated which of them are (i) widespread or systemic in contexts where the undertaking operates, or (ii) related to individual incidents.

Affidea operates medical devices, some of which require high precision under stressful circumstances. Inappropriate or prolonged use of such equipment may affect the health and safety of staff, thereby creating a potential negative impact. Occurrence of this negative impact is considered an individual incident because Affidea has high quality standards related to operations of medical devices, effectiveness of which is regularly tested by the clinical governance and quality function. In case of occurrence of a negative impact, it is registered as an incident in the Affidea Incident Management System (AIMS). A count of occurrence of such incidents in provided elsewhere as part of relevant DR.

Affidea code of conduct offers equality among workforce. There is an integrity line and procedure to anonymously report workplace related code of conduct breaches, which includes incidents of discrimination, harassment or violence at workplace. Any such incident has the potential to create a negative impact on the staff and company reputation. Occurrence of this negative impact is also considered an individual incident because Affidea has periodic compliance trainings, and internal controls reviews by the internal audit function. In case of occurrence of this negative impact, it is registered as an incident with the Country HR Director or Legal Counsel. A count of occurrence of such incidents in provided elsewhere as part of relevant DR.

Affidea collects and processes a large number of staff related personal information in each country, such as staff's bank account numbers, home addresses, salary and benefits details, family situation etc. This information is subject to data protection regulations applicable in the country of operations, and Affidea has a responsibility to protect this information, otherwise this may result in potential negative impact on the staff. This type of negative impact occurrence is also an individual incident. Related control/mitigation measure: Any personal information about staff that is not deemed to be part of employment relation is not collected, and staff has rights to full privacy. A count of occurrence of such incidents in provided elsewhere as part of relevant DR.

In 2024 Affidea experienced two exceptional incidents related to extreme climate, that not only impacted our clinics and offices, but also impacted the staff, these are:

In November 2024 Valencia region in Spain was affected by the severe weather and flooding brought on by the DANA phenomenon. Valencia is a key area for us and home to almost 750 Affidea colleagues in 7 centers. At least 40 of our colleagues have suffered significant material losses, and several centers in Valencia have suffered extensive damage. From day one, our main concern was to ensure the safety of our team members and their families. Fortunately, although many have experienced significant personal losses, all our colleagues and their families are safe. Affidea is offering financial and emotional assistance to all affected staff.

In May 2024, heavy floods hit Milan area in Italy. This caused significant damage to more than one facility. Among the hardest hit was the Affidea Martesana Centre in Gessate: the heavy rainfall severely impacted the Radiology department in the basement, and the clinic had to close for a couple of weeks.

Negative impacts related to own operations are systemic, whereas the climate incidents are individual incidents.

## Description of activities that result in positive impacts and types of employees and non-employees in its own workforce that are positively affected or could be positively affected

In addition to positive impacts mentioned in the double materiality assessment, a few practical examples of activities that resulted in positive impact on all types of employees in 2024 are as follows:

- Global Walking Challenge in October at Group Level for better health and sense of belonging. We had in total 1830 participants from all countries, who collectively walked 269,831 km and shared their walking pictures with each other for inspiration.
- Introduction of Birthday leave in Corporate, Spain and Portugal.
- Voluntary training on mental health in Spain (Sofia Tarragon) for better health.
- Team building events like the Affidea Day in Portugal and Lithuania, local Christmas dinners for employee engagement in most of the countries, and celebration of different important days like “International Day of Radiology” in all our centers.
- Hybrid mode or even remote work possibilities for work-life balance in various countries.

## Description of material risks and opportunities arising from impacts and dependencies on own workforce

Examples of material risks and opportunities related to own workforce are as follows, more details are provided in the double-materiality assessment:

- Availability of qualified medical professionals is limited in Europe, thereby increasing the wages / costs, reducing profitability and potentially longer diagnostic reporting times to the patients, affecting the company reputation and quality of health in general.
- Risk related to not providing flexible working times and work-life balance to our staff is staff burnout and therefore risk of higher costs for the company due to the need of finding replacement/reorganization of work.
- Risk of higher employee turnover if company fails to pay adequate wages.
- Risk of higher staff turnover and reputational damage - therefore higher costs for the company - in case of discrimination or unequal compensation because of e.g. gender, race, sexual orientation, disability or political opinions. These risks may also lead to sanctions or fines on Affidea and an erosion of trust in Affidea as an employer resulting in high turnover rates and thus loss of productivity and increased costs.
- Risk of higher staff turnover, deterioration of staff skills/ knowledge and referral doctors’ satisfaction if company stops to provide regular training and skill development for its staff.
- Risk of reputational and financial damage if company fails to implement appropriate measures for the privacy and protection of whistleblowers.
- Risk of health, safety and data privacy related incidents resulting in reputational and financial damage for the company.
- An opportunity for Affidea is to utilize the ESG principles and create potential employment opportunities for persons with disabilities, thereby broadening the pool of qualified labour and improving the company’s reputation.
- Another opportunity is to create policies and procedures prescribed in the ESRS, that are not yet available in Affidea.

## Description of material impacts on workers that may arise from transition plans for reducing negative impacts on environment and achieving greener and climate-neutral operations

Affidea is working on a transition plan to reduce its impact on environment and achieve greener and climate neutral operations. So far, no material impact is expected on the workers, and if at all there will be a potential negative impact, it will be disclosed in the next reporting cycle (2025).

## Information about type of operations at significant risk of incidents of forced labour or compulsory labour

At Affidea we do not operate in countries or geographic areas considered at significant risk of incidents of forced labour or compulsory labour

## Information about countries or geographic areas with operations considered at significant risk of incidents of forced labour or compulsory labour

At Affidea we do not operate in countries or geographic areas considered at significant risk of incidents of forced labour or compulsory labour

## Information about type of operations at significant risk of incidents of child labour

At Affidea we do not run operations at significant risk of incidents of child labour

## Information about countries or geographic areas with operations considered at significant risk of incidents of child labour

At Affidea we do not operate in any country at significant risk of incidents of child labour

## Disclosure of how understanding of people in its own workforce / value chain workers with particular characteristics, working in particular contexts, or undertaking particular activities may be at greater risk of harm has been developed

Being a service-oriented organization, our clinical and non-clinical staff is one of the most important stakeholder that drives everything that we do for our patients and other stakeholders. Hence, we conduct periodic staff engagement survey. In 2023, our staff provided following input (i.e., topics that they find important, and that Affidea should develop further from ESG perspective):

- Diversity & inclusion
- Work-life balance
- Career & development
- Rewards & recognition

Moreover, as part of diagnostic imaging services, Affidea operates medical devices, some of which require high precision under stressful circumstances. Inappropriate or prolonged use of such equipment may affect the health and safety of staff, thereby creating a potential negative impact, particularly on our clinical staff that has to deal with these medical devices regularly. These are the type of staff that are considered to be at higher risks of harm through business activities. As mitigation of this risk, Affidea has a number of clinical standards and procedures which are available for staff in every country, and the effectiveness of such procedures is tested regularly by the country and group quality team.

## Disclosure of which of material risks and opportunities arising from impacts and dependencies on people in its own workforce relate to specific groups of people

Our clinical staff that has to deal with medical devices regularly. These are the type of staff that are considered to be at higher risks of harm through business activities. As mitigation of this risk, Affidea has a number of clinical standards and procedures which are available for staff in every country, and the effectiveness of such procedures is tested regularly by the country and group quality team.

## Does the undertaking disclose whether and how actual and potential impacts on its own workforce: (i) originate from or are connected to undertaking's strategy and business models, and (ii) inform and contribute to adapting the undertaking's strategy and business model(s)

As identified in the double materiality assessment, Affidea's material risks & opportunities are directly related to the identified impacts and dependencies on the availability and treatment of its workforce. Some examples of inter-relation between IROs is presented here, more details can be found in double materiality assessment:

Affidea employs a large number of employees on own payroll, mostly on indefinite / long-term employment contracts, and also a significant number of staff on interim / contract basis, who offer services from Affidea premises. We create secure employment opportunities for large number of people, thereby creating a positive impact. The related risk for the company is that availability of qualified medical professionals is limited in Europe, and if we do not have sufficient staff, it could result in longer reporting times to our patients, deterioration of the quality of medical reports and therefore potential financial losses to the company.

Affidea offers all staff opportunities for individual and group coaching, mentoring and educational programs, such as leadership courses and bespoke job related trainings for further advancement of their careers, thereby creating a positive impact. Risk of higher staff turnover, deterioration of staff skills/ knowledge and referral doctors' satisfaction if company stops to provide regular training and skill development for its staff.

Affidea operates medical devices, some of which require high precision under stressful circumstances. Inappropriate or prolonged use of such equipment may affect the health and safety of staff, thereby creating a potential negative impact. Risk of health & safety-related incidents resulting in reputational and financial damage for the company.

Affidea has a structured governance model, two-tier board structure, documented code of conduct, and open culture with regards to communication and adherence to our corporate values (our company name itself signifies our three values, Affinity, Fidelity, and Idea). Our staff is encouraged to raise concerns or complaints regarding non-adherence to values or code of conduct, thereby empowering them and creating a positive impact on own workforce. The related risk is that some employees may not adhere to our values and code of conduct and can engage in a bribery or corruption event, or potential other regulatory incidents (e.g. data breach), thereby leading to reputational and/or financial damage for the company.

Affidea adheres to the statutory working times for medical professionals in accordance with the regulations in country of operations. We have a right to disconnect policy that encourages people not to respond to emails beyond working hours. Risk related to not ensuring work-life balance to our staff is staff burnout and therefore risk of higher costs for the company due to the need of finding replacement/ reorganization of work.

## 7.4.1.3.3 Policies to manage material impacts, risks and opportunities related to its own workforce

### Does the undertaking have policies that address the management of its material impacts on own workforce

Yes, several policies exist for workforce and described later in respective DRs.

### Does the undertaking disclose associated material risks and opportunities

Yes, material risks and opportunities related to workforce are described in the double-materiality assessment, as well as in respective DRs in this document.

### Does the undertaking provide a summary of the content of the policies and how they are communicated

Disclosed in respective DRs.

### Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce

Affidea has several policies & procedures related to clinical governance, that are relevant for managing IROs related to workforce and other stakeholder. Some examples are:

- Right to disconnect policy (associated with Positive Impact 5 - Working Time),
- Country's collective agreements (associated with Risk 22 - Collective bargaining; Risk 23 - Freedom of association; Positive Impact 8 - Collective bargaining),
- Consultations with workers (associated with Positive Impact 7 - Social dialogue; Risk 22 - Social dialogue).

Additionally, there are supporting policies to ensure employee's code of conduct, data protection, IT/cyber security etc., that are widely distributed and expected to be adhered to by every employee working in Affidea.

There are also specific policies to ensure health, safety and well-being of staff, such as:

- Digital disconnection Policy for mental health and work life balance
- Hand Hygiene and Infection Control to prevent illness within our workforce
- Non Discrimination Policy

### Description of key contents of policy

Each policy has a detailed table of content, that contains at minimum objectives of the policy, its intended audience and key principle that apply on the intended followers of policy.

### Description of scope of policy or of its exclusions

All Affidea policies apply to all staff employed by the company.

### Description of most senior level in organisation that is accountable for implementation of policy

Chief HR Officer for all workforce related policies.

## Disclosure of third-party standards or initiatives that are respected through implementation of policy

Affidea recognizes the Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance (text extracted from Affidea Code of Conduct document).

Although Affidea does not have a specific statement aligned with the 3 mentioned standards in the CSRD, Affidea's acknowledgement of the UDHR also imply that its Code of Conduct is informed by the principles outlined there. This proves Affidea's commitment to aligning with internationally recognised Human Rights Standards. We will further develop our policies in 2025 to align them with the mentioned standards.

Depending on the country and type of employment, Affidea employees are consulted on working conditions, wages, working time etc. in accordance with local labour regulations, and where applicable through their works council.

## Description of consideration given to interests of key stakeholders in setting policy

Being a service-oriented organization, our clinical and non-clinical staff is one of the most important stakeholder that drives everything that we do for our patients and other stakeholders. Hence, we conduct periodic staff engagement survey. In 2023, our staff provided following input (i.e., topics that they find important, and that Affidea should develop further from ESG perspective):

- Diversity & inclusion
- Work-life balance
- Career & development
- Rewards & recognition

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

All policies are available to all staff via an online document management system, that is accessible from everywhere to all employees connected to Affidea network.

## Disclosure of explanations of significant changes to policies adopted during reporting year

No significant changes in policies related to workforce during 2024.

## Description of relevant human rights policy commitments relevant to own workforce

Affidea recognizes the Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance (text extracted from Affidea Code of Conduct document).

Although Affidea does not have a specific statement aligned with the 3 mentioned standards in the CSRD, Affidea's acknowledgement of the UDHR also imply that its Code of Conduct is informed by the principles outlined there. This proves Affidea's commitment to aligning with internationally recognised Human Rights Standards. We will further develop our policies in 2025 to align them with the mentioned standards.

Affidea routinely participates in international quality control programs and its European centers have received ISO, UEMS/EBNM and JCI accreditations in some countries, which credit the highest level of quality standards in diagnostic imaging and nuclear medicine. 90% of our medical centers that perform CT or Xray examinations are on the Eurosafe Wall of stars, accredited with 5* by the European Society of Radiology for their high quality standards in radiation protection and patient safety.

The company has a strong governance model in place, supported by its Code of Conduct, and Clinical Standards and Procedures that follow the European Society of Radiology Standard Safety Standards and International Patient Safety Goals.

## Disclosure of general approach in relation to respect for human rights including labour rights, of people in its own workforce

Affidea recognizes the Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance (text extracted from Affidea Code of Conduct document).

Affidea has a structured governance model, two-tier board structure, documented code of conduct, and open culture with regards to communication and adherence to our corporate values (our company name itself signifies our three values, Affinity, Fidelity, and Idea). Our staff is encouraged to raise concerns or complaints regarding non-adherence to values or code of conduct, thereby empowering them and creating a positive impact on own workforce.

## Disclosure of general approach in relation to engagement with people in its own workforce

Being a service-oriented organization, our clinical and non-clinical staff is one of the most important stakeholder that drives everything that we do for our patients and other stakeholders. Hence, we conduct periodic staff engagement survey. In 2023, our staff provided following input (i.e., topics that they find important, and that Affidea should develop further from ESG perspective):

- Diversity & inclusion
- Work-life balance
- Career & development
- Rewards & recognition

## Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts

Affidea has a structured governance model, two-tier board structure, documented code of conduct, and open culture with regards to communication and adherence to our corporate values (our company name itself signifies our three values, Affinity, Fidelity, and Idea). Our staff is encouraged to raise concerns or complaints regarding non-adherence to values or code of conduct, thereby empowering them and creating a positive impact on own workforce.

Affidea has various compliance policies to manage material human rights impacts of its workforce: Code of Conduct, Anti-Bribery, Business Party Selection, Conflict of Interests, Gifts and Hospitality, Whistle Blowing. Compliance related concerns or incidents may be reported in accordance with Whistleblowing policy. The contact point is ethicsline or General Counsel and CEO and corporate HR. The Whistleblowing policy covers all compliance related topics.

## Disclosure of whether and how policies are aligned with relevant internationally recognised instruments

Affidea has a large set of policies & procedures related to clinical governance (i.e. medical standards), that are aligned with country medical regulations as well as group medical standards. These clinical standards are fundamental to how our staff is expected to operate our clinics, protect their own health and wellbeing while serving the patients, and ensuring high quality diagnostics and patient care.

Affidea routinely participates in international quality control programs and its European centers have received ISO, UEMS/EBNM and JCI accreditations in some countries, which credit the highest level of quality standards in diagnostic imaging and nuclear medicine. 90% of our medical centers that perform CT or Xray examinations are on the Eurosafe Wall of stars, accredited with 5* by the European Society of Radiology for their high quality standards in radiation protection and patient safety.

Although Affidea does not have a specific statement aligned with the 3 mentioned standards in the CSRD, Affidea's acknowledgement of the UDHR also imply that its Code of Conduct is informed by the principles outlined there. This proves Affidea's commitment to aligning with internationally recognised Human Rights Standards. We will further develop our policies in 2025 to align them with the mentioned standards.

## Policies explicitly address trafficking in human beings, forced labour or compulsory labour and child labour

Affidea has a Code of Conduct.
At Affidea we do not operate in countries or geographic areas considered at significant risk of incidents of forced labour or compulsory labour
At Affidea we do not run operations at significant risk of incidents of child labour
At Affidea we do not operate in any country at significant risk of incidents of child labour

### Workplace accident prevention policy or management system is in place

Affidea has a decentralised operating model, in which all countries are operated in accordance with locally applicable rules and regulations. Health & safety policies are also designed and implemented in each country according to local regulations, and their effectiveness is periodically assessed by the country quality team. However, incidents and breaches related to health and safety of staff or patients is registered in a centralised incident management database (AIMS), and follow-up on serious incidents is performed at group level by the group clinical and quality team.

### Specific policies aimed at elimination of discrimination are in place

In addition to Affidea code of conduct, there is a specific Non-Discrimination Policy, and in each job advertisement we provide a disclaimer promoting fairness and equality in recruitment process. There is also a Whistle Blowing Policy and Procedure, that can be used to anonymously report any related incidents.

### Grounds for discrimination are specifically covered in policy

In addition to Affidea code of conduct, there is a specific Non-Discrimination Policy, and in each job advertisement we provide a disclaimer promoting fairness and equality in recruitment process. There is also a Whistle Blowing Policy and Procedure, that can be used to anonymously report any related incidents.

### Disclosure of specific policy commitments related to inclusion and (or) positive action for people from groups at particular risk of vulnerability in own workforce

Non-Discrimination Policy and, in some countries the government regulates this (disabilities, age…) with economical aids to the company and we use them.

### Disclosure of whether and how policies are implemented through specific procedures to ensure discrimination is prevented, mitigated and acted upon once detected, as well as to advance diversity and inclusion

In addition to Affidea code of conduct, there is a specific Non-Discrimination Policy, that is available in the document management system. Each job advertisement has a disclaimer promoting fairness and equality in recruitment process. There is also a Whistle Blowing Policy and Procedure, that can be used to anonymously report any related incidents.

### Disclosure on an illustration of the types of communication of its policies to those individuals, group of individuals or entities for whom they are relevant

Group Quality department manages a document management system, that contains all relevant and most up to date version of policies. For specific HR policies, the HR team sends an announcement email to the relevant staff (e.g. Birthday leave policy, Performance review process etc.)

### Policies and procedures which make qualifications, skills and experience the basis for the recruitment, placement, training and advancement are in place or planned

There is group Recruitment policy, which is currently in review for potential updates.

### Has or planning to assign responsibility at top management level for equal treatment and opportunities in employment, issue clear company-wide policies and procedures to guide equal employment practices, and link advancement to desired performance in this area

Affidea's Chief Human Resource Officer (CHRO) is a member of the Executive Committee (top management) to guide the management and ensure compliance with respective people related policies and procedures.

## Staff training on non-discrimination policies and practices are in planned or in place

Affidea has a specific compliance training platform, called Cognito, that is available to all own workforce members, for trainings on compliance related policies, such as code of conduct, cyber security, data privacy etc. Annually all relevant staff is required to sign an online disclosure that they have read and understood the global code of conduct and its related policies.

## Adjustments to the physical environment to ensure health and safety for workers, customers and other visitors with disabilities are planned or in place

Affidea has a decentralised operating model, in which all countries are operated in accordance with locally applicable rules and regulations. Health & safety policies are also designed and implemented in each country according to local regulations, and their effectiveness is periodically assessed by the country quality team. Where applicable, at clinic level or office level, adjustments are made to accommodate special needs of staff or patients to access our premises (e.g. a wheelchair ramp, elevator or bathrooms fitted with handrails).

## Plans to evaluate or has evaluated whether a there is a risk that job requirements have been defined in a way that would systematically disadvantage certain groups

Job advertisements are defined keeping in mind the specific needs of the job/role, without any prejudice or unfairness. However, depending on the type of role and required physical effort (e.g. the job of a nurse or medical attendant sometime requires physical lifting of patients or material), some jobs may not be applicable to special needs candidates.

## Planning to keep or keeping an up-to-date records on recruitment, training and promotion that provide a transparent view of opportunities for employees and their progression

All our vacancies are posted on our websites (group and local) and sometimes reinforced with internal announcements. Trainings are announced by HR teams (e.g. Spain) and Clinical Education Team (clinical trainings) to relevant population. Regarding promotions are announced internally for recognition and transparent communication.

## Has put in place or plans to put in place grievance procedures to address complaints, handle appeals and provide recourse for employees when discrimination is identified, and is alert to formal structures and informal cultural issues that can prevent employees from raising concerns and grievances

Affidea has a structured governance model, two-tier board structure, documented code of conduct, and open culture with regards to communication and adherence to our corporate values (our company name itself signifies our three values, Affinity, Fidelity, and Idea). Our staff is encouraged to raise concerns or complaints regarding non-adherence to values or code of conduct, thereby empowering them and creating a positive impact on own workforce.

Compliance related concerns or incidents may be reported in accordance with Whistleblowing policy. The contact point is ethicsline or General Counsel and CEO and corporate HR. The Whistleblowing policy covers all compliance related topics. Besides that Affidea established a specific reporting tool for clinical incidents called AIMS. We have also various, dedicated reporting lines regarding clinical incidents, PDBs, claims & litigation etc.

## Have or plans to have programs to promote access to skills development

We have group wide and country specific training and development plans. Legal and Clinical Educational Teams have a dedicated platform for training. Hard skills are managed by the own function and soft skills are proposed and arranged by HR, with several initiatives across countries focus on different soft skills (analytical thinking, team management, etc.)

## 7.4.1.3.4 Processes for engaging with own workers and workers' representatives about impacts

### Does the undertaking disclose general processes for engaging with its own workers / workers representatives regarding actual and potential material impacts on the workforce

Yes, staff engagement survey is organized periodically to understand staff needs and challenges, and involves the creation of joint action plans between corporate HR and country HR.

### Disclosure of whether and how perspectives of own workforce inform decisions or activities aimed at managing actual and potential impacts

Staff engagement survey is designed to collect feedback from staff on various topics / questions. Example of topics: Diversity and Inclusion, Career & Development, Engagement, Performance, Recognition and Work Life Balance

### Engagement occurs with own workforce or their representatives

Engagement occurs directly with the workforce via a periodic and anonymous survey, facilitated by an independent and external consultancy company.

### Disclosure of the stage at which engagement occurs, type of engagement and frequency of engagement

Engagement occurs at all stages/levels of employees and all types of staff (clinical / non-clinical), directly with the workforce via a periodic (once in two years) and anonymous survey, facilitated by an independent and external consultancy company, which also gives us a benchmark on how our engagement is vs. other companies in the same sector.

### Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens and that results inform undertaking's approach

Group Chief HR Officer (CHRO) is responsible. He is a member of executive committee (top-management), who ensures engagement occurs periodically and input from the engagement results is addressed with corrective actions, where necessary.

### Disclosure of Global Framework Agreement or other agreements related to respect of human rights of workers

Affidea has a decentralised operating model. All policies / procedures as well as employment agreements are tailored to country specific regulations and labour law requirements. Hence, other than the global code of conduct and related policies, there is no global framework agreement.

### Disclosure of how the effectiveness of engagement with its workforce is assessed

Effectiveness of own workforce engagement is assessed based on the participation rate in the engagement survey, overall engagement score, number of positive comments, and number of suggestions for improvements.

Outcome of engagement survey is shared with responsible function/department head to discuss the results with his/her team, and discuss potential remedies / solutions for challenges / actions suggested in the survey.

### Disclosure of steps taken to gain insight into perspectives of people in its own workforce that may be particularly vulnerable to impacts and (or) marginalised

In general, we have not taken steps with these specific groups. We are not recording particular actions to prevent the discrimination or its perception among potentially vulnerable groups. In some countries it is not even legal to ask employees to declare if they are part of any of the vulnerable groups mentioned.

In any case, our code of conduct is applicable to all employees, and any form of discrimination among any type of employees is strictly prohibited.

## Statement in case the undertaking has not adopted a general process to engage with its own workforce

Not applicable, as we have an engagement process.

## Disclosure of timeframe for adoption of general process to engage with its own workforce in case the undertaking has not adopted a general process for engagement

Not applicable, as we have an engagement process.

## Disclosure of how undertaking engages with at-risk or persons in vulnerable situations

Not applicable, as we have a common engagement process for all types of workforce.

## Disclosure of how potential barriers to engagement with people in its workforce are taken into account

Engagement occurs electronically via an engagement survey, so all types of employees can record their concern formally and anonymously. But employees also have the possibility to share their concerns verbally or via email to their respective function manager, HR Director or group Legal counsel for whistleblowing concerns.

## Disclosure of how people in its workforce are provided with information that is understandable and accessible through appropriate communication channels

Affidea has a document management system (managed by the quality team), that contains all relevant policies, procedures and work related instructions / standards. Periodically, the communication and HR departments share a newsletter informing staff about latest developments in the company.

## Disclosure of any conflicting interests that have arisen among different workers and how these conflicting interests have been resolved

Affidea has not identified any conflicting interests among workforce, in relation to the engagement process.

## Disclosure of how undertaking seeks to respect human rights of all stakeholders engaged

Affidea's code of conduct, and its commitment to comply with UN resolution on human rights is the main framework to respect human rights of all workforce stakeholders.

## Information about effectiveness of processes for engaging with its own workforce from previous reporting periods

The process is last year's engagement assessment has been the same:
Effectiveness of own workforce engagement is assessed based on the participation rate in the engagement survey, overall engagement score, number of positive comments, and number of suggestions for improvements.

Outcome of engagement survey is shared with responsible function/department head to discuss the results with his/her team, and discuss potential remedies / solutions for challenges / actions suggested in the survey.

## 7.4.1.3.5 Processes to remediate negative impacts and channels for own workers to raise concerns

### Does the undertaking disclose processes to provide/cooperate in the remediation of negative impacts on the workforce

Yes, where applicable and when necessary, Affidea fully cooperated and helps the affected staleholders in remediation of negative impacts.

### Does the undertaking disclose information on channels available to own workers to raise concerns and have them addressed

Affidea has a structured governance model, two-tier board structure, documented code of conduct, and open culture with regards to communication and adherence to our corporate values (our company name itself signifies our three values, Affinity, Fidelity, and Idea). Our staff is encouraged to raise concerns or complaints regarding non-adherence to values or code of conduct, thereby empowering them and creating a positive impact on own workforce.

### Disclosure of general approach to and processes for providing or contributing to remedy where an undertaking has caused or contributed to a material negative impact on people in its workforce

Affidea manages material impacts and risks related to own workforce in the following ways:
Potential negative impact related to data privacy and security are addressed by the Data Protection Policy and Identity, Access and Information Security Policy.

Negative Impact related to health, safety and security are also managed via the Clinical Incident Management policy.

Other compliance and non-discrimination related issues are managed via the Code of Conduct.

All the clinical staff who may be exposed to radiation while performing specific diagnostic activities are protected by specific preventive methods compliant with the regulations at European and country level (e.g. occupational risk prevention standards). There are specific policies and procedures for radiation protection and occupational health and safety of all staff.

### Disclosure of specific channels in place for its workforce to raise concerns or needs directly with undertaking and have them addressed

Compliance related concerns or incidents may be reported in accordance with Whistleblowing policy. The contact point is ethicsline or General Counsel and CEO and corporate HR. The Whistleblowing policy covers all compliance related topics. Besides that Affidea established a specific reporting tool for clinical incidents called AIMS. We have also various, dedicated reporting lines regarding clinical incidents, PDBs, claims & litigation etc.

### Third-party mechanisms are accessible to all own workforce

Yes, the code of conduct and whistle-blowing procedure are available to all staff via the Affidea Document Management System (ADMS), as well as in the compliance training platform (Cognito).
There are no other third-party mechanisms.

### Disclosure of how own workforce and their workers' representatives are able to access channels at level of undertaking they are employed by or contracted to work for

Whistleblowing policy is accessible via Cognito. All of our policies are published in our ADMS (Affidea Document Management System), which is an online SharePoint based tool, accessible to all staff that is connected to Affidea network.

### Grievance or complaints handling mechanisms related to employee matters exist

The specific mechanism explained in our whistleblowing policy is our Ethical line. Furthermore, the Group HRBPs and all the local HR representatives are in charge of listening and/or address the potential complaints.

### Disclosure of processes through which undertaking supports or requires the availability of channels

The onboarding process includes the sharing of the Code of Conduct and the ADMS. Furthermore, the Group and Local employee sites have direct access to those resources. When a new channel or policy is available, HR team sends an email from hrcommunication@affidea.com to the relevant staff.

## Disclosure of how issues raised and addressed are tracked and monitored and how effectiveness of channels is ensured

Concerns related to whistleblowing policy are addressed via a corporate email (ethicsline@affidea.com). Group CHRO and Legal Counsel are jointly responsible for receiving and addressing such concerns. It is ensured in Whistle Blowing procedure and related SOP according to which once any Affidea Personnel have raised a concern, the Affidea Group will acknowledge its receipt within 7 days of that receipt, will carry out an initial assessment to determine the scope of any investigation and will inform the Whistle Blower of the outcome of the assessment. In some cases, the Affidea Group may appoint an investigator or team of investigators (which may include other appropriate Affidea Personnel with relevant experience of investigations or specialist knowledge of the subject matter). The investigator(s) may make recommendations for change to enable the Affidea Group to minimise the risk of future wrongdoing.

As for the discrimination policy, country HR representatives are accountable for tracking and monitoring how raised and addressed issues are tracked.

All concerns or complaints raised by employees are recorded in a country specific register, which is independently reviewed by the country HR team members, and directed for action / remediation to relevant function or department manager.

## Disclosure of whether and how it is assessed that its own workforce is aware of and trust structures or processes as way to raise their concerns or needs and have them addressed

Annual code of conduct training to remind people about applicable mechanisms to raise concerns, and the number of such reported concerns is a measure to assess the effectiveness of such channels.

## Policies regarding protection against retaliation for individuals that use channels to raise concerns or needs are in place

Whistleblowing policy has a specific paragraph describing protection against retaliation. It is ensured in Whistle Blowing procedure that it guarantees confidentiality, no retaliation and support for whistle blower. According to Affidea Whistleblowing policy Affidea Group recognises that the decision of Affidea Personnel to report a concern may be a difficult one to make. Provided that any disclosures are made in good faith, Affidea Personnel should have nothing to fear because they will be acting in the best interests of the Affidea Group.

## Statement in case the undertaking has not adopted a channel for raising concerns

Not applicable, as we have a process.

## Disclosure of timeframe for a channel for raising concerns to be in place

Not applicable, as we have a process.

### 7.4.1.3.6 Actions and resources in relation to own workforce

## Disclosure of key action

Based on the staff engagement survey results, some concrete actions have been identified and they were executed or being rolled-out in 2024, as follows:

**Staff Career & Development:** Center Manager Academy is launched to understand the career needs and define a career progression path for the center staff.

**Diversity & Inclusion:** A formal Discrimination Policy is defined an published, to address any issues identified specific to discrimination, in addition to a formal code of conduct.

**Managerial training:** Launched a training program for leadership skills designed for the middle managers reporting directly to executive committee members.

**Performance Management:** In 2024 we launched a survey to collect employee's feedback about our Performance Appraisal process. Based on this feedback we have implemented specific improvements and changes. For example, we have extended the stakeholder review option from Corporate to all the countries. We have provided the employees with access to their manager's evaluation feedback before the review meeting.

**Rewards & Recognition:** In 2024 we have launched Employee of the Month, Quarterly Newsletter and Culture Awards.

**Leadership:** We have rolled-out a specific training on the Leadership Circle Methodology for Executive Committee and Country CEOs.

**Work-life Balance:** We have launched Birthday leave policy.

## Description of scope of key action

All the actions are applicable to all staff employed by Affidea.

## Time horizon under which key action is to be completed

During the course of 2025.

## Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

Key actions taken are described earlier. There are specific policies to ensure health, safety and well-being of staff, that will prevent, detect or correct any potential or actual material impacts, such as:

- Digital disconnection Policy for mental health and work life balance
- Hand Hygiene and Infection Control to prevent illness within our workforce
- Non Discrimination Policy to ensure all employees are treated equally.
- Code of conduct policy and annual training, to ensure all staff is aware of the fundamental rules and principles of working at Affidea.
- Whistle-blower policy, to provide an anonymous channel to employees to raise concerns, and feel protected against any retaliation.

## Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

No formal action plan in prior periods.

## Disclosure of the type of current and future financial and other resources allocated to the action plan

No specific resources, actions are part of existing HR initiatives for which budget is made available from general corporate HR budget.

## Current financial resources allocated to action plan (Capex)

No specific resources, actions are part of existing HR initiatives for which budget is made available from general corporate HR budget.

## Current financial resources allocated to action plan (Opex)

No specific resources, actions are part of existing HR initiatives for which budget is made available from general corporate HR budget.

## Future financial resources allocated to action plan (Capex)

No specific resources, actions are part of existing HR initiatives for which budget is made available from general corporate HR budget.

## Future financial resources allocated to action plan (Opex)

No specific resources, actions are part of existing HR initiatives for which budget is made available from general corporate HR budget.

## Does the undertaking disclose approaches and actions to taking action related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Affidea has a large set of policies & procedures related to clinical governance (i.e. medical standards), that are aligned with country medical regulations as well as group medical standards. These clinical standards are fundamental to how our staff is expected to operate our clinics, protect their own health and wellbeing while serving the patients, and ensuring high quality diagnostics and patient care.

Additionally, there are supporting policies to ensure employee's code of conduct, data protection, IT/cyber security etc., that are widely distributed and expected to be adhered to by every employee working in Affidea.

There are also specific policies to ensure health, safety and well-being of staff, such as:

- Digital disconnection Policy for mental health and work life balance
- Hand Hygiene and Infection Control to prevent illness within our workforce
- Non Discrimination Policy

Based on 2023 SES results, following actions are planned in coming year:

**Example 1** CAREER & DEVELOPMENT We are working on the Center Manager Academy.

**Example 2** DIVERSITY & INCLUSION We are about to publish a new Discrimination Policy.

**Example 3** MANAGER We launched a training action for leadership skills designed for the middle managers reporting directly to EXCO members. See enclosed email as an evidence. Target population: less than 50.

**Example 4** PERFORMANCE MANAGEMENT In 2024 we launched a survey to collect employee's feedback about our Performance Appraisal process. Based on this feedback we have implemented specific improvements and changes. We have extended the stakeholder review option from Corporate to all the countries. We have provided the employees with access to their manager's evaluation feedback before the review meeting.

**Example 5** REWARDS & RECOGNITION In 2024 we have launched EOM, quarterly Newsletter and Culture Awards.

**Example 6** LEADERSHIP We have rolled-out a specific training on the Leadership Circle Methodology for EXE COM and CEOS.

**Example 7** WORKLIFE BALANCE We have launched Birthday leave policy .

## If so, does the undertaking disclose the effectiveness of those actions

Yes, various processes and procedures in place to manage/remediate potentially material negative impacts, such as:

Clinical governance standards and policies, maintained and monitored by the global and country medical and quality team.

Global data protection policy and program, lead by global data protection officer (G-DPO), and country data protection officers (C-DPOs), who are responsible to manage patient data safely and in compliance with data protection regulations.

Cyber security policies, managed by global CISO (corporate information security officer).

## Description of action taken, planned or underway to prevent or mitigate negative impacts on own workforce

Following are instances of potential negative impact, that were identified during the double-materiality assessment.

Negative Impact 11: Affidea operates medical devices, some of which require high precision under stressful circumstances. Inappropriate or prolonged use of such equipment may affect the health and safety of staff, thereby creating a potential negative impact. Occurrence of this negative impact is considered an individual incident because Affidea has high quality standards related to operations of medical devices, effectiveness of which is regularly tested by the clinical governance and quality function. In case of occurrence of a negative impact, it is registered as an incident in the Affidea Incident Management System (AIMS). A count of occurrence of such incidents in provided elsewhere as part of relevant DR.

Negative Impact 12: Affidea code of conduct offers equality among workforce. There is an integrity line and procedure to anonymously report workplace related code of conduct breaches, which includes incidents of discrimination, harassment or violence at workplace. Any such incident has the potential to create a negative impact on the staff and company reputation. Occurrence of this negative impact is also considered an individual incident because Affidea has periodic compliance trainings, and internal controls reviews by the internal audit function. In case of occurrence of this negative impact, it is registered as an incident with the Country HR Director or Legal Counsel. A count of occurrence of such incidents in provided elsewhere as part of relevant DR.

Negative Impact 13: Affidea collects and processes a large number of staff related personal information in each country, such as staff's bank account numbers, home addresses, salary and benefits details, family situation etc. This information is subject to data protection regulations applicable in the country of operations, and Affidea has a responsibility to protect this information, otherwise this may result in potential negative impact on the staff. This type of negative impact occurrence is also an individual incident. Related control/mitigation measure: Any personal information about staff that is not deemed to be part of employment relation is not collected, and staff has rights to full privacy. A count of occurrence of such incidents in provided elsewhere as part of relevant DR.

## Disclosure on whether and how action has been taken to provide or enable remedy in relation to actual material impact

In 2024 Affidea experienced two exceptional incidents related to extreme climate, that not only impacted our clinics and offices, but also impacted the staff, these are:

In November 2024 Valencia region in Spain was affected by the severe weather and flooding brought on by the DANA phenomenon. Valencia is a key area for us and home to almost 750 Affidea colleagues in 7 centers. At least 40 of our colleagues have suffered significant material losses, and several centers in Valencia have suffered extensive damage. From day one, our main concern was to ensure the safety of our team members and their families. Fortunately, although many have experienced significant personal losses, all our colleagues and their families are safe. Affidea is offering financial and emotional assistance to all affected staff.

In May 2024, heavy floods hit Milan area in Italy. This caused significant damage to more than one facility. Among the hardest hit was the Affidea Martesana Centre in Gessate: the heavy rainfall severely impacted the Radiology department in the basement, and the clinic had to closed for a couple of weeks.

## Description of additional initiatives or actions with primary purpose of delivering positive impacts for own workforce

Discount on healthcare insurance for our employees. In Hungary, they have a discount on glasses and aids for public transportation and gym. To promote sense of belonging: wedding bonus in Hungary, baby present in Spain, Women's bonus in Romania, back to school allowance (1 time payment in September).

## Description of how effectiveness of actions and initiatives in delivering outcomes for own workforce is tracked and assessed

Effectiveness of own workforce related actions and initiatives is assessed based on the participation rate in the engagement survey, overall engagement score, number of positive comments, and number of suggestions for improvements, which can be provided via the formal engagement survey or via periodic management interaction with staff, or during the annual performance appraisal process.

## Description of process through which it identifies what action is needed and appropriate in response to particular actual or potential negative impact on own workforce

Actions and initiatives to address potential negative impacts is planned based on employee feedback, which can be provided via the formal engagement survey or via periodic management interaction with staff, or during the annual performance appraisal process.

## Description of what action is planned or underway to mitigate material risks arising from impacts and dependencies on own workforce and how effectiveness is tracked

Affidea has an enterprise risk management framework, that is managed at group level, identifying key risks and controls related to overall business model and strategy. The group risk register is updated annually via a global risk survey, in which all country managers participate and assess key risks and controls. This provides a broader understanding of potential impact, risks and opportunities also related to own workforce. E.g. lack of availability of skilled staff is one of the top-10 risks.

Additionally, functional risk registers are also maintained by: the clinical governance and quality team (to address any potential impacts or risks related to clinical processes). Cyber security team maintains a risk register for IT and cyber risks, and data protection team maintains a risk overview of potential data protection impacts, risks and opportunities.

Depending on the type of impact, risk or opportunity, actions are planned or taken by the respective functional team. For example, based on 2023 SES results the HR department is focused on the next key actions related to own workforce:

| | |
|---|---|
| **Example 1** | CAREER & DEVELOPMENT We are working on the Center Manager Academy. |
| **Example 2** | DIVERSITY & INCLUSION We are about to publish a new Discrimination Policy |
| **Example 3** | MANAGER We launched a training action for leadership skills designed for the middle managers reporting directly to EXCO members. See enclosed email as an evidence. Target population: less than 50. |
| **Example 4** | PERFORMANCE MANAGEMENT In 2024 we launched a survey to collect employee's feedback about our Performance Appraisal process. Based on this feedback we have implemented specific improvements and changes. We have extended the stakeholder review option from Corporate to all the countries. We have provided the employees with access to their manager's evaluation feedback before the review meeting. |
| **Example 5** | REWARDS & RECOGNITION In 2024 we have launched EOM, quarterly Newsletter and Culture Awards. |
| **Example 6** | LEADERSHIP We have rolled-out a specific training on the Leadership Circle Methodology for EXE COM and CEOS. |
| **Example 7** | WORKLIFE BALANCE We have launched Birthday leave policy |

## Description of what action is planned or underway to pursue material opportunities in relation to own workforce

An opportunity for Affidea is to utilize the ESG principles and create potential employment opportunities for persons with disabilities, thereby broadening the pool of qualified labour and improving the company's reputation. Another opportunity is to create policies and procedures prescribed in the ESRS, that are not yet available in Affidea.

## Disclosure of whether and how it is ensured that own practices do not cause or contribute to material negative impacts on own workforce

Actions to prevent, mitigate or remediate potential material negative impacts on workforce include:

- All medical equipment is periodically maintained and certified in accordance with country medical & clinical standards, to ensure the quality of clinical outcomes is not compromised due to equipment malfunction.
- Regular training of staff to prevent diagnostic errors or delays in reporting. When an error does occur, it is recorded in Affidea incident management system (AIMS), reported to senior management, and corrective actions are taken.
- Regular training and awareness campaigns on personal and sensitive data protection, and monthly monitoring, at group level and country level, of all data privacy breaches. When occurred, data breaches are investigated, and reported to data protection authorities in alignment with the applicable regulatory thresholds.
- Regular monitoring of patient and referring doctor's feedback, and actions planned and executed to address their comments for a better experience.
- Continuous investment in new digital tools for the digital patient journey (online booking, online results, online check in) to improve their digital experience as well as in new AI solutions to improve diagnostic accuracy or operational efficiency.

Additionally, Affidea code of conduct describes what is expected from our staff, and potential business partners, and despite not being heavily exposed to manufacturing or supply chain industry risks, we have specific policies on supplier selection & due diligence, through which all our suppliers are assessed on their commitment to human rights adherence, health, safety & environment laws etc. Our main equipment suppliers are large publicly listed firms, who have very established duty of care procedures themselves.

Third parties such as consultants and contractors are also expected to observe the same ethical standards and comply with the Affidea Code of Conduct. The relevant contracts (agency, collaboration, supply, joint venture etc.) contain explicit obligations on the third party to comply with relevant compliance regulations.

## Disclosure of resources allocated to the management of material impacts

The resources in HR for the management of material impacts are: 2 Group HRBPs and 1 HR rep per country.
HR budget at group level has key items / areas like: talent attraction, talent development and talent engagement.
As for specific budget lines for the specific actions: TBC

## Disclosure of general and specific approaches to addressing material negative impacts

Following are instances of potential negative impact, that were identified during the double-materiality assessment.

Negative Impact 11: Affidea operates medical devices, some of which require high precision under stressful circumstances. Inappropriate or prolonged use of such equipment may affect the health and safety of staff, thereby creating a potential negative impact. Occurrence of this negative impact is considered an individual incident because Affidea has high quality standards related to operations of medical devices, effectiveness of which is regularly tested by the clinical governance and quality function. In case of occurrence of a negative impact, it is registered as an incident in the Affidea Incident Management System (AIMS). A count of occurrence of such incidents in provided elsewhere as part of relevant DR.

Negative Impact 12: Affidea code of conduct offers equality among workforce. There is an integrity line and procedure to anonymously report workplace related code of conduct breaches, which includes incidents of discrimination, harassment or violence at workplace. Any such incident has the potential to create a negative impact on the staff and company reputation. Occurrence of this negative impact is also considered an individual incident because Affidea has periodic compliance trainings, and internal controls reviews by the internal audit function. In case of occurrence of this negative impact, it is registered as an incident with the Country HR Director or Legal Counsel. A count of occurrence of such incidents in provided elsewhere as part of relevant DR.

Negative Impact 13: Affidea collects and processes a large number of staff related personal information in each country, such as staff's bank account numbers, home addresses, salary and benefits details, family situation etc. This information is subject to data protection regulations applicable in the country of operations, and Affidea has a responsibility to protect this information, otherwise this may result in potential negative impact on the staff. This type of negative impact occurrence is also an individual incident. Related control/mitigation measure: Any personal information about staff that is not deemed to be part of employment relation is not collected, and staff has rights to full privacy. A count of occurrence of such incidents in provided elsewhere as part of relevant DR.

## Disclosure of initiatives aimed at contributing to additional material positive impacts

In addition to positive impacts mentioned in the double materiality assessment, a few practical examples of activities that resulted in positive impact on all types of employees in 2024 are as follows:

- Global Walking Challenge in October at Group Level for better health and sense of belonging. We had in total 1830 participants from all countries, who collectively walked 269831 km and shared their walking pictures with each other for inspiration.
- Introduction of Birthday leave in Corporate, Spain and Portugal.
- Voluntary training on mental health in Spain (Sofia Tarragon) for better health.
  -Team building events like the Affidea Day in Portugal or the local Christmas dinners for employee engagement in all countries.
- Hybrid mode or even remote work possibilities for work-life balance in various countries.

## Disclosure of how far undertaking has progressed in efforts during reporting period

This is the first year of reporting, so progress will be tracked from next reporting cycle.

## Disclosure of aims for continued improvement

This is the first year of reporting, so progress will be tracked from next reporting cycle.

## Disclosure of whether and how undertaking seeks to use leverage with relevant business relationships to manage material negative impacts affecting own workforce

Affidea periodically participates in industry conferences and seminars of international stature, such as Radiological Society of North America (RSNA) conference, where a lot of knowledge exchanges occur with industry peers.

## Disclosure of how the initiative, and its own involvement, is aiming to address the material impact concerned

When and where necessary, Affidea involves subject matter experts in a specific branch of medicine for a peer review, to ensure quality of diagnostics or analysis is not compromised and own staff judgement is substantiated to ensure best patient care, as well as staff comfort before reporting on a complex medical procedure.

## Disclosure of whether and how workers and workers' representatives play role in decisions regarding design and implementation of programs or processes whose primary aim is to deliver positive impacts for workers

In addition to positive impacts mentioned in the double materiality assessment, a few practical examples of activities that resulted in positive impact on all types of employees in 2024 are as follows:

- Global Walking Challenge in October at Group Level for better health and sense of belonging. We had in total 1830 participants from all countries, who collectively walked 269831 km and shared their walking pictures with each other for inspiration.
- Introduction of Birthday leave in Corporate, Spain and Portugal.
- Voluntary training on mental health in Spain (Sofia Tarragon) for better health.
- Team building events like the Affidea Day in Portugal or the local Christmas dinners for employee engagement in all countries.
- Hybrid mode or even remote work possibilities for work-life balance in various countries.

These initiatives were designed in consultation with a small group of employees, who shared their ideas on how to further improve employee engagement.

## Information about intended or achieved positive outcomes of programs or processes for own workforce

Improved employee engagement, productivity boost, and improved financial results.

## Initiatives or processes whose primary aim is to deliver positive impacts for own workforce are designed also to support achievement of one or more of Sustainable Development Goals

The main SDGs supported by Affidea via its workforce related activities are: ensuring 'Good health & wellbeing', 'Gender Equality', and 'Decent work & economic growth'. These are supported via providing discounted healthcare at Affidea clinics, secure employment by providing long term contracts to most staff, and ensuring no discrimination among staff members.

## Information about measures taken to mitigate negative impacts on workers that arise from transition to greener, climate-neutral economy

Affidea is working on a transition plan to reduce its impact on environment and achieve greener and climate neutral operations. So far, no material impact is expected on the workers, and if at all there will be a potential negative impact, it will be disclosed in the next reporting cycle (2025).

## Description of internal functions that are involved in managing impacts and types of action taken by internal functions to address negative and advance positive impacts

Global HR team, Global Clinical and Quality team, Group Risk & Assurance function and Global Legal team.

Affidea has an enterprise risk management framework, that is managed at group level, identifying key risks and controls related to overall business model and strategy. The group risk register is updated annually via a global risk survey, in which all country managers participate and assess key risks and controls. This provides a broader understanding of potential impact, risks and opportunities also related to own workforce. E.g. lack of availability of skilled staff is one of the top-10 risks.

Additionally, functional risk registers are also maintained by: the clinical governance and quality team (to address any potential impacts or risks related to clinical processes). Cyber security team maintains a risk register for IT and cyber risks, and data protection team maintains a risk overview of potential data protection impacts, risks and opportunities. Depending on the type of impact, risk or opportunity, actions are planned or taken by the respective functional team.

## 7.4.1.3.7 Tracking effectiveness of policies and actions through targets

### Does the undertaking disclose targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Yes, Affidea has defined ESG targets for 2025 onwards, some of which will specifically track workforce related metric, such as employee engagement score, percentage of compliance training completion, number of incidents related to health, safety and data privacy.

### If so, does the undertaking disclose the effectiveness of the targets

Affidea has defined ESG targets for 2025 onwards, some of which will specifically track workforce related metric, such as employee engagement score, percentage of compliance training completion, number of incidents related to health, safety and data privacy. These will be tracked and reported structurally from next reporting cycle.

### Relationship with policy objectives

Targets are broadly linked to Affidea's ESG principles, and commitments on social and governance (described in earlier in details).

### Measurable target

Employee engagement above 50%, percentage of compliance trainings: 85%

### Nature of target

Engagement and Compliance.

### Description of scope of target

All Affidea employees are in scope of the target.

### Baseline value

2024 is the first year, so baseline value will be 2024 value.

### Baseline year

2024

### Period to which target applies

2025 onwards

### Indication of milestones or interim targets

Improved employee engagement, productivity boost, and improved financial results for the company, that will also improve the continuity of employment for all workforce, and for eligible employees a one time performance linked incentive (STIP).

### Description of methodologies and significant assumptions used to define target

The main reason for defining staff engagement score and compliance training completion as two measurable targets is that both these topics are material for the positive impact on workforce and financial success of the company.

### Target related to environmental matters is based on conclusive scientific evidence

No, environmental target is not defined for workforce.

### Disclosure of how stakeholders have been involved in target setting

Most of the initiatives / targets described earlier were the result of staff engagement survey analysis, that provided insights on what the stakeholders (employees) would like to improve.

### Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data

This is the first year, so no changes have been done.

### Description of performance against disclosed target

This is the first year, so performance will be measured from next year.

A few practical examples of activities that resulted in positive impact on all types of employees in 2024 are as follows:

- Global Walking Challenge in October at Group Level for better health and sense of belonging. We had in total 1830 participants from all countries, who collectively walked 269831 km and shared their walking pictures with each other for inspiration.
- Introduction of Birthday leave in Corporate, Spain and Portugal.
- Voluntary training on mental health in Spain (Sofia Tarragon) for better health.
- Team building events like the Affidea Day in Portugal or the local Christmas dinners for employee engagement in all countries.
- Hybrid mode or even remote work possibilities for work-life balance in various countries.

### Disclosure of whether and how own workforce or workforce' representatives were engaged directly in setting targets

Affidea's senior management was involved in setting targets, as a representative of the workforce.

### Disclosure of whether and how own workforce or workforce' representatives were engaged directly in tracking performance against targets

Targets are yet to be launched, so their performance tracking will be applicable from next reporting cycle.

### Disclosure of whether and how own workforce or workforce' representatives were engaged directly in identifying lessons or improvements as result of undertakings performance

Targets are yet to be launched, so their performance tracking will be applicable from next reporting cycle.

### Disclosure of intended outcomes to be achieved in lives of people in its own workforce

Improved employee engagement, productivity boost, and improved financial results for the company, that will also improve the continuity of employment for all workforce, and for eligible employees a one time performance linked incentive (STIP).

### Information about stability over time of target in terms of definitions and methodologies to enable comparability

Targets are yet to be launched, so their performance tracking will be applicable from next reporting cycle.

### Disclosure of references to standards or commitments which targets are based on

Benchmarking with other healthcare companies.

## 7.4.1.3.8 Employee characteristics

### Employees, by gender (headcount)

| Gender | # of employees |
|---|---|
| Women | 7,253 |
| Men | 1,980 |
| Other | 0 |
| Not Disclosed | 0 |
| Total | 9,233 |

### Number of executive and non-executive members

Number of management board members: 2

Number of supervisory board member: 5

Number of senior leadership team members (top management): 20

Non-executive supervisory board members: 5

### Employees, by contract type, by gender (headcount)

| | Women | Men | Other | Not disclosed | Total |
|---|---|---|---|---|---|
| Number of employees | 7,253 | 1,980 | 0 | 0 | 9,233 |
| Number of permanent employees | 6,619 | 1,716 | 0 | 0 | 8,335 |
| Number of temporary employees | 672 | 226 | 0 | 0 | 898 |
| Number of non-guaranteed hours employees | 243 | 103 | 0 | 0 | 346 |
| Number of full-time employees | 5,443 | 1,354 | 0 | 0 | 6,797 |
| Number of part-time employees | 1,810 | 626 | 0 | 0 | 2,436 |

## Employees, by contract type, by country (headcount)

| | Number of employees | Number of permanent employees | Number of temporary employees | Number of non-guaranteed hours employees | Number of full-time employees | Number of part-time employees |
|---|---|---|---|---|---|---|
| Bosnia | 41 | 39 | 2 | 0 | 41 | 0 |
| Croatia | 139 | 136 | 3 | 0 | 112 | 27 |
| Czech Republic | 179 | 105 | 74 | 74 | 105 | 74 |
| Greece | 884 | 853 | 31 | 0 | 810 | 74 |
| Hungary | 360 | 360 | 0 | 16 | 309 | 51 |
| Ireland | 364 | 356 | 8 | 0 | 323 | 41 |
| Italy | 931 | 840 | 91 | 0 | 754 | 177 |
| Lithuania | 1,227 | 1,227 | 0 | 0 | 467 | 760 |
| Poland | 361 | 305 | 56 | 0 | 336 | 25 |
| Portugal | 987 | 873 | 114 | 0 | 892 | 95 |
| Romania | 1,506 | 1,458 | 48 | 0 | 1,223 | 283 |
| Spain | 954 | 841 | 113 | 0 | 451 | 503 |
| Switzerland | 371 | 369 | 2 | 21 | 134 | 237 |
| Türkiye | 530 | 176 | 354 | 0 | 496 | 34 |
| United Kingdom | 279 | 278 | 1 | 235 | 241 | 38 |
| Corporate | 120 | 119 | 1 | 0 | 103 | 17 |

## Employees, by countries with 50 or more employees (headcount)

| Country with 50 or more employees | # of employees |
|---|---|
| Bosnia | 41 |
| Croatia | 139 |
| Czech Republic | 179 |
| Greece | 884 |
| Hungary | 360 |
| Ireland | 364 |
| Italy | 931 |
| Lithuania | 1,227 |
| Poland | 361 |
| Portugal | 987 |
| Romania | 1,506 |
| Spain | 954 |
| Switzerland | 371 |
| Türkiye | 530 |
| United Kingdom | 279 |
| Corporate | 120 |

### Number of employees (headcount)

9,233

### Average number of employees (headcount)

577.06

### Number of employee who have left the undertaking

1,632

### Percentage of employee turnover

18.40%

### Description of methodologies and assumptions used to compile data (employees)

To consolidate all data, Corporate HR team reviewed the data submission from the countries ensuring consistency. Methodologies used at the country level were defined at group level, via a common data collection template, that was provided to the countries in which they could report their data. This was then consolidated using a group reporting tool.

### Employees numbers are reported in head count or full-time equivalent

Yes, both numbers are reported monthly to finance team.

### Employees numbers are reported at end of reporting period/average/other methodology

Yes, as part or year-end reporting

### Report contextual information necessary to understand the data reported on employee demographic

This is the first year of reporting, any steep fluctuations will be disclosed from next reporting cycle.

### Disclosure of cross-reference of information reported to most representative number in financial statements

This will be disclosed at the year-end while publishing final numbers.

## 7.4.1.3.9 Non-employees

### Does the undertaking disclose information of non-employees in its workforce

Yes, a large part of our workforce is contracted clinical personnel, who are either self-employed or working through an agency.

Affidea has decided to report on non-employees from 2025, so this will be a phased-in disclosure.

### Disclosure of the most common types of non-employees

Most common type of non-employees in our workforce are contracted doctors, who provide radiologist services to Affidea. They could be physically located in one of our clinic to perform a radiology service, and report to the patient or they offer tele-radiology services from their own clinics. There are also doctors who provide clinical consultation services.

Affidea has decided to report on non-employees from 2025, so this will be a phased-in disclosure.

### Description of methodologies and assumptions used to compile data (non-employees)

Affidea has decided to report this from 2025, so this will be a phased-in disclosure.

### Non-employees numbers are reported in headcount/full time equivalent

All numbers are reported in head-counts.

### Non-employees numbers are reported at end of reporting period/average/other methodology

Yes, they are also included in the periodic reporting from countries to head-office, and also at the end of ESG reporting period.

### Disclosure of contextual information necessary to understand data (non-employee workers)

This is the first year of reporting, any steep fluctuations will be disclosed from next reporting cycle.

### Description of basis of preparation of non-employees estimated number

This differs in different Affidea countries, in some countries contracted doctors are recruited and their administration is managed partly by HR and partly by operations, and in other countries it is completely managed by operations team, so HR team involvement is limited, but the information about contractors is available at each country level.

### 7.4.1.3.10 Collective bargaining coverage and social dialogue

## Does the undertaking disclose information on the extent to which the working conditions and terms of employment of its own workforce are determined or influenced by collective bargaining agreements and to the extent to which its employees are covered in social dialogue

Yes, each country has reported the number of employees covered by collective bargaining agreements, based on which a table is prepared showing percentages, in accordance with the respective AR70. On a global level approx. 39% of the own workforce is covered by collective bargaining agreements.

## Collective bargaining coverage and social dialogue per country

| | Collective Bargaining Coverage | | Social dialogue |
|---|---|---|---|
| **Coverage Rate** | **Employees - EEA** | **Employees – Non-EEA** | **Workplace representation (EEA only)** |
| 0-19% | Croatia, Czech Republic, Hungary, Ireland, Lithuania, Poland, Romania | Bosnia, Switzerland, United Kingdom | Croatia, Czech Republic, Greece, Hungary, Ireland, Italy, Lithuania, Poland, Portugal, Romania, Spain, Switzerland, Türkiye, United Kingdom, Corporate |
| 20-39% | Corporate | | |
| 40-59% | Greece | | |
| 60-79% | | Türkiye | |
| 80-100% | Italy, Portugal, Spain | | |

## Collective bargaining coverage and social dialogue - detailed per country

| | Number of employees covered by collective bargaining agreements | Percentage of total employees covered by collective bargaining agreements | Number of employees who are covered by / member of a workers' representative | Percentage of employees covered by workers' representatives |
|---|---|---|---|---|
| Bosnia | 0 | 0% | 0 | 0% |
| Croatia | 0 | 0% | 0 | 0% |
| Czech Republic | 0 | 0% | 0 | 0% |
| Greece | 380 | 42.99% | 0 | 0% |
| Hungary | 0 | 0% | 0 | 0% |
| Ireland | 0 | 0% | 0 | 0% |
| Italy | 931 | 100% | 80 | 8.59% |
| Lithuania | 0 | 0% | 0 | 0% |
| Poland | 0 | 0% | 0 | 0% |
| Portugal | 987 | 100% | 20 | 2.03% |
| Romania | 0 | 0% | 12 | 0.8% |
| Spain | 954 | 100% | 14 | 1.47% |
| Switzerland | 0 | 0% | 0 | 0% |
| Türkiye | 353 | 66.60% | 0 | 0% |
| United Kingdom | 0 | 0% | 0 | 0% |
| Corporate | 27 | 22.050% | 0 | 0% |
| **Total** | **3,632** | **39.34%** | **126** | **1.36%** |

## Working conditions and terms of employment for employees not covered by collective bargaining agreements are determined based on collective bargaining agreements that cover other employees or based on collective bargaining agreements from other undertakings

Affidea has decided to report this from 2025, so this will be a phased-in disclosure.

## Description of extent to which working conditions and terms of employment of non-employees in own workforce are determined or influenced by collective bargaining agreements

Affidea has decided to report this from 2025, so this will be a phased-in disclosure.

## Disclosure of existence of any agreement with employees for representation by European Works Council (EWC), Societas Europaea (SE) Works Council, or Societas Cooperativa Europaea (SCE) Works Council

This is depending on the country legislation, and to be verified at country level.

### 7.4.1.3.11 Diversity indicators

## Employees, by category, by gender (headcount)

| Employee category | Gender | # of employees | % employees |
|---|---|---|---|
| Top management | Women | 4 | 20 |
| Top management | Men | 16 | 80 |
| Top management | Total | 20 | 100 |

## Disclosure of own definition of top management used

Top management of Affidea includes the management board members, executive committee and the senior leadership team (SLT). Some of the people in these three committees are common.

## Employees by age group by country (headcount)

| Country | Employees under 30 years old | | Employees between 30 and 50 years old | | Employees over 50 years old | | Total | |
|---|---|---|---|---|---|---|---|---|
| | Number | % | Number | % | Number | % | Number | % |
| Bosnia | 6 | 14.6 | 25 | 61.0 | 10 | 24.4 | 41 | 100 |
| Croatia | 19 | 13.7 | 67 | 48.2 | 53 | 38.1 | 139 | 100 |
| Czech Republic | 17 | 9.5 | 65 | 36.3 | 97 | 54.2 | 179 | 100 |
| Greece | 216 | 24.4 | 520 | 58.8 | 148 | 16.7 | 884 | 100 |
| Hungary | 80 | 22.2 | 182 | 50.6 | 98 | 27.2 | 360 | 100 |
| Ireland | 89 | 24.5 | 203 | 55.8 | 72 | 19.8 | 364 | 100 |
| Italy | 154 | 16.5 | 544 | 58.4 | 233 | 25.1 | 931 | 100 |
| Lithuania | 204 | 16.6 | 646 | 52.6 | 377 | 30.7 | 1,227 | 100 |
| Poland | 68 | 18.8 | 250 | 69.3 | 43 | 11.9 | 361 | 100 |
| Portugal | 165 | 16.7 | 578 | 58.6 | 244 | 24.7 | 987 | 100 |
| Romania | 315 | 20.9 | 901 | 59.8 | 290 | 19.2 | 1,506 | 100 |
| Spain | 210 | 22.0 | 550 | 57.7 | 194 | 20.4 | 954 | 100 |
| Switzerland | 76 | 20.5 | 189 | 50.9 | 106 | 28.6 | 371 | 100 |
| Türkiye | 268 | 50.6 | 216 | 40.8 | 46 | 8.7 | 530 | 100 |
| United Kingdom | 82 | 29.4 | 140 | 50.2 | 57 | 20.4 | 279 | 100 |
| Corporate | 14 | 11.7 | 93 | 77.5 | 13 | 10.8 | 120 | 100 |
| **Total** | **1,983** | **21.5** | **5,169** | **56.0** | **2,081** | **22.5** | **9,233** | **100** |

## 7.4.1.3.12 Adequate wages

### Does the undertaking disclose information whether or not all parts of its own workforce are paid an adequate wage in line with applicable benchmarks

Yes, all Affidea employees are paid an adequate wage in line with country benchmarks.

### All employees are paid adequate wage, in line with applicable benchmarks

Yes, all Affidea employees are paid an adequate wage in line with country benchmarks. We have an agreement with Willis Towers Watson to run annual salary benchmarks for non-clinical personnel. Most clinical personnel are contractors, and we establish ad-hoc fees aligned with the market at country level.

### Percentage of  employees paid below the applicable adequate wage benchmark

0

### Percentage of non-employees paid below adequate wage

Affidea has decided to report on non-employees from 2025, so this will be a phased-in disclosure.

## 7.4.1.3.13 Social protection

### Does the undertaking disclose the coverage of its own workforce by social protection against loss of income due to major life events: (a) sickness; (b) unemployment starting from when the own worker is working for the undertaking; (c) employment injury and acquired disability; (d) maternity leave; and (e) retirement.

Yes, we have reported the number of employees covered by social protection against loss of income due to major life events including sickness and family leave, but not all details of type of events are disclosed.

### If not all workers are covered, does it disclose  the countries where this is not the case

Yes, a country by country report is available.

### All employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to sickness

We have reported the number of employees covered by social protection against loss of income due to major life events including sickness and family leave, but not all details of type of events are disclosed yet.

### All employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to unemployment starting from when own worker is working for undertaking

We have reported the number of employees covered by social protection against loss of income due to major life events including sickness and family leave, but not all details of type of events are disclosed yet.

### All employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to employment injury and acquired disability

We have reported the number of employees covered by social protection against loss of income due to major life events including sickness and family leave, but not all details of type of events are disclosed yet.

### All employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to parental leave

We have reported the number of employees covered by social protection against loss of income due to major life events including sickness and family leave, but not all details of type of events are disclosed yet.

## All employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to retirement

We have reported the number of employees covered by social protection against loss of income due to major life events including sickness and family leave, but not all details of type of events are disclosed yet.

## Disclosure of types of employees who are not covered by social protection, through public programs or through benefits offered, against loss of income due to sickness

Yes, a country by country report is available.

## Disclosure of types of employees who are not covered by social protection, through public programs or through benefits offered, against loss of income due to unemployment starting from when own worker is working for undertaking

Yes, a country by country report is available.

## Disclosure of types of employees who are not covered by social protection, through public programs or through benefits offered, against loss of income due to employment injury and acquired disability

Yes, a country by country report is available.

## Disclosure of types of employees who are not covered by social protection, through public programs or through benefits offered, against loss of income due to maternity leave

Yes, a country by country report is available.

## Disclosure of types of employees who are not covered by social protection, through public programs or through benefits offered, against loss of income due to retirement

Yes, a country by country report is available.

## Headcount and percentage of employees covered by social protection, through public programs or by the employer's benefits against loss of income

| Country | Number | Number of employees covered by social protection | Percentage of employees covered by social protection |
|---|---|---|---|
| Bosnia | 41 | 41 | 100 |
| Croatia | 139 | 139 | 100 |
| Czech Republic | 179 | 179 | 100 |
| Greece | 884 | 884 | 100 |
| Hungary | 360 | 360 | 100 |
| Ireland | 364 | 364 | 100 |
| Italy | 931 | 931 | 100 |
| Lithuania | 1,227 | 1,227 | 100 |
| Poland | 361 | 361 | 100 |
| Portugal | 987 | 987 | 100 |
| Romania | 1,506 | 1,506 | 100 |
| Spain | 954 | 954 | 100 |
| Switzerland | 371 | 371 | 100 |
| Türkiye | 530 | 0 | 0 |
| United Kingdom | 279 | 279 | 100 |
| Corporate | 120 | 120 | 100 |
| **Total** | **9,233** | **8,703** | **94.26** |

## 7.4.1.3.14 Employees with disabilities

### Percentage of persons with disabilities amongst employees subject to legal restrictions on collection of data

1.43%

### Disclosure of contextual information necessary to understand data and how data has been compiled

Yes, a country by country report is available. For example in Spain, for the retention scheme, they need to report whether and how much disabilities they have.

## 7.4.1.3.15 Employee training and education

### Does the undertaking disclose the percentage to which training and skills development is provided to the employees

Yes, a country by country report is available.

### Employees that participated in regular performance and career development reviews per country per gender

| Country | Performance and career development | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | Number of employees covered | Percentage of employees that participated | Number of Male employees covered | Percentage of male employees that participated | Number of Female employees covered | Percentage of female employees that participated | Number/ proportion of performance reviews per employee | Number of reviews in proportion to the agreed number of reviews by the management |
| Bosnia | 5 | 12.20 | 2 | 8.70 | 3 | 16.67 | 0.12 | 100 |
| Croatia | 10 | 7.19 | 3 | 11.54 | 7 | 6.19 | 0.07 | 100 |
| Czech Republic | 3 | 1.68 | 3 | 5.45 | 0 | 0 | 0.02 | 100 |
| Greece | 833 | 94.23 | 135 | 87.66 | 698 | 95.62 | 0.94 | 100 |
| Hungary | 48 | 13.33 | 16 | 31.37 | 32 | 10.36 | 0.13 | 100 |
| Ireland | 364 | 100 | 114 | 100 | 250 | 100 | 1.00 | 100 |
| Italy | 42 | 4.51 | 14 | 8.64 | 28 | 3.64 | 0.05 | 100 |
| Lithuania | 50 | 4.07 | 5 | 1.76 | 45 | 4.77 | 0.04 | 100 |
| Poland | 107 | 29.64 | 28 | 60.87 | 79 | 25.08 | 0.30 | 100 |
| Portugal | 94 | 9.52 | 24 | 18.18 | 70 | 8.19 | 0.10 | 100 |
| Romania | 113 | 7.50 | 23 | 9.43 | 90 | 7.13 | 0.08 | 100 |
| Spain | 88 | 9.22 | 29 | 11.69 | 59 | 8.36 | 0.09 | 100 |
| Switzerland | 350 | 94.34 | 77 | 90.59 | 273 | 95.45 | 0.94 | 100 |
| Türkiye | 84 | 15.85 | 45 | 25.00 | 39 | 11.14 | 0.16 | 100 |
| United Kingdom | 279 | 100 | 105 | 100 | 174 | 100 | 1.00 | 100 |
| Corporate | 112 | 93.33 | 68 | 95.77 | 44 | 89.80 | 0.93 | 100 |
| **Total** | **2,582** | **27.96** | **691** | **34.90** | **1,891** | **26.07** | **0.28** | **100** |

### Employees that participated in training per country per gender

| Country | Training | | | | | |
|---|---|---|---|---|---|---|
| | Number of hours of training that the total staff have undertaken | Average number of training hours per employee | Total number of training hours completed by male employees | Average number of training hours of male employees | Total number of training hours completed by female employees | Average number of training hours of female employees |
| Bosnia | 336 | 8.20 | 224 | 9.74 | 112 | 6.22 |
| Croatia | 1,192 | 8.58 | 152 | 5.85 | 1,040 | 9.20 |
| Czech Republic | 721 | 4.03 | 336 | 6.11 | 385 | 3.10 |
| Greece | 809.5 | 0.92 | 213 | 1.38 | 596.5 | 0.82 |
| Hungary | 12,237.87 | 33.99 | 1,978.02 | 38.78 | 10,259.85 | 33.20 |
| Ireland | 9,814 | 26.96 | 3,502.5 | 30.72 | 6,311.5 | 25.25 |
| Italy | 9,993.2 | 10.73 | 1,419.45 | 8.76 | 8,573.75 | 11.15 |
| Lithuania | 4,768 | 3.89 | 216 | 0.76 | 4,552 | 4.83 |
| Poland | 2,062 | 5.71 | 517 | 11.24 | 1,545 | 4.90 |
| Portugal | 1,5768.7 | 15.98 | 1,958.7 | 14.84 | 1,3810 | 16.15 |
| Romania | 1,4563 | 9.67 | 2,278 | 9.34 | 12,285 | 9.73 |
| Spain | 9,809 | 10.28 | 1,986 | 8.01 | 7,823 | 11.08 |
| Switzerland | 4,033 | 10.87 | 1,590 | 18.71 | 2,443 | 8.54 |
| Türkiye | 13,780 | 26.00 | 4,680 | 26.00 | 9,100 | 26.00 |
| United Kingdom | 192 | 0.69 | 60 | 0.57 | 132 | 0.76 |
| Corporate | 409 | 3.41 | 273 | 3.85 | 136 | 2.78 |
| **Total** | **100,488.3** | **10.88** | **21,383.67** | **10.80** | **79,104.6** | **10.91** |

## 7.4.1.3.16 Health and safety

### Percentage of people in its own workforce who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines

100%. All Affidea employees are covered by health and safety management system.

### Number of fatalities in own workforce as result of work-related injuries and work-related ill health

0

### Number of fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites

Affidea has decided to report on non-employees from 2025, so this will be a phased-in disclosure.

### Number of recordable work-related accidents for own workforce

95

### Rate of recordable work-related accidents for own workforce

7.42

### Number of cases of recordable work-related ill health of non-employees

8

## Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health related to employees

1,508

## Description of underlying standards for internal audit or external certification of health and safety management system

Affidea has a large set of policies & procedures related to clinical governance (i.e. medical standards), that are aligned with country medical regulations as well as group medical standards. These clinical standards are fundamental to how our staff is expected to operate our clinics, protect their own health, safety and wellbeing while serving the patients, and ensuring high quality diagnostics and patient care.

Affidea routinely participates in international quality control programs and its European centers have received ISO, UEMS/EBNM and JCI accreditations in some countries, which credit the highest level of quality standards in diagnostic imaging and nuclear medicine. 90% of our medical centers that perform CT or Xray examinations are on the Eurosafe Wall of stars, accredited with 5* by the European Society of Radiology for their high quality standards in radiation protection and patient safety.

Effectiveness of clinical governance processes and quality of clinical process outcomes is assessed by the medical council via periodic peer reviews among various medical council members, and through internal clinical governance & quality audits to ensure all applicable processes and standards are correctly followed by the clinical staff.

Effectiveness of data protection processes is monitored by the DPOs at country and group level, and periodic spot data protection audits are performed by quality and internal audit team during their clinic visits.

Effectiveness of personnel safety and security procedures is monitored by the operational and IT / cyber security teams, to ensure physical safety and cyber security of the patient data.

Effectiveness of other supporting business processes (order to cash, purchase to pay, record to report, hire to retire) and compliance trainings is audited by the internal audit department in their periodic country audits.

## Number of fatalities in own workforce as result of work-related injuries

0

## Number of fatalities in own workforce as result of work-related ill health

0

## 7.4.1.3.17 Work-life balance indicators

### All employees are entitled to family-related leaves through social policy and (or) collective bargaining agreements

Yes, a country by country report is available.

### Number and percentage of employees that took family related leave by country by gender

| Country | Number of employees who are entitled to take family-related leave | Percentage of employees who are entitled to take family-related leave | Percentage of entitled employees who took family-related leave in the reporting period | Number of male employees who took family-related leave in the reporting period | Percentage of male employees who took family-related leave in the reporting period | Number of female employees who took family-related leave in the reporting period | Percentage of female employees who took family-related leave in the reporting period |
|---|---|---|---|---|---|---|---|
| Bosnia | 41 | 100.00 | 2.44 | 0.00 | 0.00 | 1.00 | 5.56 |
| Croatia | 139 | 100.00 | 4.32 | 0.00 | 0.00 | 6.00 | 5.31 |
| Czech Republic | 179 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Greece | 884 | 100.00 | 11.09 | 4.00 | 2.60 | 94.00 | 12.88 |
| Hungary | 360 | 100.00 | 11.67 | 1.00 | 1.96 | 41.00 | 13.27 |
| Ireland | 364 | 100.00 | 8.24 | 7.00 | 6.14 | 23.00 | 9.20 |
| Italy | 931 | 100.00 | 17.51 | 20.00 | 12.35 | 143.00 | 18.60 |
| Lithuania | 1,227 | 100.00 | 7.33 | 6.00 | 2.11 | 84.00 | 8.91 |
| Poland | 361 | 100.00 | 63.99 | 37.00 | 80.43 | 194.00 | 61.59 |
| Portugal | 987 | 100.00 | 13.68 | 9.00 | 6.82 | 126.00 | 14.74 |
| Romania | 1,506 | 100.00 | 4.25 | 0.00 | 0.00 | 64.00 | 5.07 |
| Spain | 954 | 100.00 | 3.88 | 10.00 | 4.03 | 27.00 | 3.82 |
| Switzerland | 371 | 100.00 | 2.16 | 0.00 | 0.00 | 8.00 | 2.80 |
| Türkiye | 530 | 100.00 | 8 | 10.00 | 5.56 | 34.00 | 9.71 |
| United Kingdom | 279 | 100.00 | 4.66 | 2.00 | 1.90 | 11.00 | 6.32 |
| Corporate | 120 | 100.00 | 7.50 | 4.00 | 5.63 | 5.00 | 10.20 |
| **Total** | **9,233** | **100.00** | **10.52** | **110.00** | **5.56** | **861.00** | **11.87** |

## 7.4.1.3.18 Gender pay gap

### Does it disclose the ratio between the compensation of highest paid individual and the median compensation for its employees

Yes, a country by country report is available.

### Gender pay gap

31.58%

### Annual total remuneration ratio

84.44

### Disclosure of contextual information necessary to understand data, how data has been compiled and other changes to underlying data that are to be considered

Yes, a country by country report is available.

## 7.4.1.3.19 Incidents of discrimination, complaints and corrective actions taken

### Disclosure of work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders across operations in the reporting period, including incidents of harassment as a specific form of discrimination

2

### Total number of incidents of discrimination during the reporting period

2

### Number of complaints filed through channels for people in own workforce to raise concerns

0

### Number of complaints filed to National Contact Points for OECD Multinational Enterprises

0

### Amount of material fines, penalties, and compensation for damages as result of violations regarding social and human rights factors

0

### Information about reconciliation of material fines, penalties, and compensation for damages as result of violations regarding social and human rights factors with most relevant amount presented in financial statements

This will be disclosed at the year-end while publishing final numbers.

### Disclosure of contextual information necessary to understand data and how data has been compiled (work-related grievances, incidents and complaints related to social and human rights matters)

This will be disclosed at the year-end while publishing final numbers.

### Number of severe human rights issues and incidents connected to own workforce

0

### Number of severe human rights issues and incidents connected to own workforce that are cases of non respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises

0

### No severe human rights issues and incidents connected to own workforce have occurred

This will be disclosed at the year-end while publishing final numbers.

### Amount of material fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce

0

### Information about reconciliation of amount of material fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce with most relevant amount presented in financial statements

This will be disclosed at the year-end while publishing final numbers.

### Disclosure of the status of (a) incidents reviewed by the undertaking; (b) remediation plans being implemented; (c) remediation plans that have been implemented, with results reviewed through routine internal management review processes; and (d) incidents no longer subject to action

This will be disclosed at the year-end while publishing final numbers.

### Number of severe human rights cases where undertaking played role securing remedy for those affected

0

## 7.4.1.4 Social Information: Consumer and end-users

### 7.4.1.4.1 Material impacts, risks and opportunities and their interaction with strategy and business model

#### How the interests, views and rights of its consumers and/or end-users, including respect for their human rights, inform its strategy and business model. Consumers and/or end-users are a key group of affected stakeholders

Having access to healthcare is a fundamental human right, which is the main reason why Affidea exist. Hence, commitment to human rights is central to Affidea's operations, ensuring equitable access to healthcare, protecting patient privacy, and upholding individual dignity. This principle guides not only how Affidea delivers care but also which type of services it adds to its portfolio in different regions. Affidea recognizes the Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance (text extracted from Affidea Code of Conduct document).

In the beginning of 2023 Affidea conducted a full strategy review with the help of an external consulting firm (LEK), that performed a thorough analysis of healthcare markets in which Affidea operates, their consumer trends, patient needs and sector challenges.

This detailed strategic review provided insights on where and how Affidea currently plays a role, and where it can make a difference in the lives of millions of healthcare patients and their referring doctors (primary consumers and end user of Affidea are the patients & their families, as well as referring doctors, who refer patients to Affidea and use our diagnostic reports for further analysis and treatments).

Together with monthly patient satisfaction surveys that are conducted regularly in all our clinics, and yearly referring doctor's survey, Affidea identified the key challenges faced by our patients in our operating environment, and adapted its business model to provide more effective OOH (out of hospital) patient care models in multiple Affidea countries in 2024. For details on LEK findings and our business model we refer to slides 'Affidea strategy overview', that were shared with PWC.

Periodic customer surveys / feedback collected from clinics, call center and social media informs the development of new products and services that address patient needs and help identify areas for growth in different regions. This approach ensures Affidea's efforts align with its goal of making healthcare more accessible and inclusive.

Country-specific research further supports this mission. In Lithuania, market research conducted this summer revealed consumer perceptions of Affidea's services, key decision drivers, and expectations. These insights have shaped our marketing and branding strategy in the country aimed at expanding our range of services and the way we are reaching our patients. Similarly, focus groups on women's health have guided the development of a specific branding for women's health and a clear positioning.

#### How does your company identify potential and actual impacts related to your business model and strategy on your consumer / end-user and vice versa, who are your consumer / end-user

A number of consumer and end-user related IROs were identified during Affidea's DMA (double-materiality analysis). These IROs were partly based on the LEK strategy review referred in previous narrative, and partly based on our internal patient satisfaction surveys, that provide key insights on i) what our consumer / patients needs, ii) how Affidea meet those needs, and iii) where we have gaps (i.e. complaints). Most of these IROs are structurally already addressed in our business model (e.g. patient access, safety, security, privacy, quality of clinical outcomes, non-discrimination etc.), and some of them will be more regularly tracked and reported as part of ESG targets, which will be reported from 2025 onwards.

#### What is the relationship between the material risks and opportunities arising from impacts and dependencies on consumers / end-users and your strategy and business model

Yes, Affidea's material risks and opportunities related to consumers and end users are directly linked to our business model and strategy. Most of the material risks and opportunities are structurally already addressed in our business model (e.g. enhancing patient access, safety, security, privacy, quality of clinical outcomes, non-discrimination etc.), and some of these will be more regularly tracked and reported as part of ESG targets, which will be reported from 2025 onwards.

#### All consumers and end-users who can be materially impacted by undertaking are included in scope of disclosure

Yes, Affidea's materially impacted 'consumers and end-users' are the patients & their families, as well as referring doctors, who refer patients to Affidea and use our diagnostic reports for further analysis and treatments. Both these stakeholder groups are included in our IRO analysis (part of DMA), and in disclosures related to S4, as well as in ESRS2.

## Description of types of consumers and end-users subject to material impacts

Affidea's materially impacted consumers and end user are the patients & their families, as well as referring doctors, who refer patients to Affidea and use our diagnostic reports for further analysis and treatments.

## Type of consumers and end-users subject to material impacts by own operations or through value chain

Affidea's operations and value chain involve a wide range of stakeholders, with material impact from the consumer and end-user perspective being most significant for patients and referring doctors. Specific considerations regarding consumers and end-users are outlined below:

**Patients:** This stakeholder group is directly impacted by the quality, accuracy, and accessibility of Affidea's services. Vulnerable groups, such as the elderly, those with chronic diseases, or individuals in underserved regions, may face unique health risks if not able to gain access to primary healthcare services that are provided by Affidea and other similar companies. Patients are inherently dependent on accurate, accessible information about services to make informed healthcare decisions. Affidea also processes personal information of patients, which if not properly protected could lead to negative impact on the patients. Marketing of Affidea services is primarily done with the purpose of enhancing healthcare awareness, but if not adhered to respective country regulations, or breaching patient privacy, this may also lead to negative impact on patients.

**Referring Doctors:** Clinical decisions made by referring doctors rely on the accuracy and reliability of diagnostic results provided by Affidea. Misdiagnoses or delays can negatively impact patient outcomes, making precision and timeliness critical.

**Payors and Commissioners:** These entities depend on Affidea to deliver cost-effective, accurate healthcare services. Marketing and communication strategies must avoid discriminatory practices or misleading claims.

**Pharmaceutical Companies for Clinical Studies:** Collaborations with pharmaceutical companies rely on the integrity and security of clinical data. Any compromise to data privacy or research ethics could negatively impact the rights and trust of participants.

**Private Companies (Occupational Health):** Affidea's occupational health services must ensure the health and safety of the employees from the companies that we provide these services. Data related to employees is handled responsibly, avoiding risks to their privacy or potential misuse of health information.

## Material negative impacts occurrence (consumers and end-users)

Potential material negative impacts on consumers & end-users include:

**Diagnostic Errors or Delays:** These can lead to mistreatment, deterioration of patient health, or even life-threatening situations.

**Data Privacy Breaches:** Sensitive health information could be exposed, risking patient confidentiality.

Access Barriers: Certain geographic areas may have limited access to Affidea's medical services due to long waiting lists, no representation in that geographic area, leading to healthcare inequalities.

**Customer Dissatisfaction:** Negative experiences (e.g., long waiting times, unclear results) could diminish trust in healthcare services.

These are all potential negative impacts, and not widespread or systematic. When negative incidents occur they are limited to specific region, country or individual patients.

## Description of activities that result in positive impacts and types of consumers and end-users that are positively affected or could be positively affected

Positive impacts from Affidea's activities include:

**Timely and accurate Diagnostics:** Leading to better treatment outcomes and patient satisfaction.

**Implementation of innovative technologies:** AI-based diagnostic solutions that enhance precision and speed, as well as wider implementation of tele-radiology services to cater to the needs of remotely located patients.

**Expanding Healthcare Access:** New medical centers in underserved regions improve healthcare accessibility.

**Digitalization:** across the patient journey also supports better access to high-quality care as patients can make their appointment with one click and can receive their medical results safely online, being able to share them with their doctor, which improves access to faster treatment.

**Community engagement:** By supporting local communities and public health initiatives, Affidea promotes health education and better access to medical services.

Positively affected groups include:

**Patients:** Receive quicker care and better treatment outcomes.

**Referring Doctors:** Benefit from accurate, timely results to guide medical decisions.

**Payors/Commissioners:** Improve healthcare delivery efficiency through trusted medical services.

## Description of material risks and opportunities arising from impacts and dependencies on consumers and end-users

Material risks & opportunities related to consumers and end-users include:

### Risks:

**Financial:** Risk of loss of revenue if company failed to collect and make appropriate action related to the feedbacks provided by patients. Risk of health & safety-related incidents resulting in reputational and financial damage for the company.
Service disruptions: Equipment malfunctions or shortages can delay diagnostics, affecting patients and doctors.
Data breaches: Compromising patient privacy and damaging trust. Risk of penalties, damaged reputation arising from potential violations of privacy laws and potential privacy incidents related to patients and end-users.

**Reputational risks:** Service failures or mismanagement of customer complaints could harm relationships with referring doctors, patients, and payors. Additionally, risk of reputational and financial damage if company fails to implement appropriate measures against discrimination, harassment or violence at Affidea clinics.
Regulatory Compliance: Failure to adhere to health and safety standards or data privacy laws may result in fines and loss of trust.

### Opportunities:

**Financial:** improved financial results for Affidea when its services are appreciated by the patients. This can be in the form of new contracts with public health authorities, insurance companies or out of pocket patients.

**Enhanced healthcare:** Opportunity for Affidea to positively influence the social inclusion of their consumers and end-users through their social engagements which sparks dialogue and awareness around unspoken issues, thus tapping into broader customer groups and increasing customer trust and loyalty, ultimately leading to an increase in sales.
**Access to growth capital:** More confidence in Affidea's services means enhance market reputation, which results in new opportunities for growth and access to growth capital.

## Disclosure of how understanding of how consumers and end-users with particular characteristics, working in particular contexts, or undertaking particular activities may be at greater risk of harm has been developed

Affidea's approach to identify consumers and end-users with particular characteristics includes:

**Vulnerability assessments:** Identifying specific groups, such as elderly patients, those with chronic conditions, or those in underserved regions, who may be more vulnerable to healthcare access challenges or diagnostic errors.

**Clinical guidelines:** Tailored care processes for high-risk patients, ensuring that their diagnostic and treatment needs are met safely and effectively. For example, in Affidea Ireland, we used an identification yellow bracelet that is effective in identifying patients with high-risk of potential falls.

**Data analytics:** Using patient feedback to identify trends in service access, quality, and outcomes.

**Patient risk profiling:** Identifying vulnerable patients (e.g., elderly, those with chronic illnesses, rural populations) and tailoring services accordingly through the use of a CRM (For now, the CRM has been implemented in Romania and Lithuania, to be further rolled out across other countries).

**Training of staff:** Specific training for communicating with and treating vulnerable groups with utmost care.

**Partnerships with Community Organizations:** Where relevant, engaging with local NGOs to understand specific regional or demographic healthcare needs.
Affidea also has group level policies, procedures, guidelines for certain consumer groups that are at greater risk, i.e. "Care of high-risk patients policy" or "Justification of exposure of women of childbearing age to ionizing radiation", "Management of patients with cardiac implantable electronic devices during radiotherapy", "Fall Risk Reduction Guideline", etc.

## Disclosure of which of material risks and opportunities arising from impacts and dependencies on consumers and end-users are impacts on specific groups

Affidea recognizes that certain groups may experience more significant impacts, including:

**Elderly patients:** Higher risk due to increased healthcare needs and vulnerability to misdiagnosis.

Patients in rural or remote areas: Limited access to advanced healthcare services.

**Low-Income patients:** Financial constraints affecting access to medical care, without waiting long time for public access.

Individuals with disabilities: Accessibility barriers to physical medical centers.

## 7.4.1.4.2 Policies to manage material impacts, risks and opportunities related to consumers and end-users

### Does the undertaking have policies to manage its material impacts of its products and/or services on consumers and end-users

Affidea has a large set of policies & procedures related to clinical governance (i.e. medical standards), that are aligned with country medical regulations as well as group medical standards. These clinical standards are fundamental to how we operate our clinics and serve the patients, and to ensure high quality diagnostics and patient care.

Additionally, there are supporting policies to ensure patient data protection, cyber security, and employee's code of conduct that are widely distributed and expected to be adhered to by every employee working in Affidea.

### Does the undertaking disclose associated material risks and opportunities

Yes, material risks & opportunities related to consumers and end users were part of our DMA, and also mentioned in previous narratives.

### Does the undertaking provide a summary of the content of the policies and how they are communicated?

Yes, the main content of key policies is disclosed below.

All policies are distributed to all employees via the internal document management system, that is managed by the respective country quality function, and reviewed by global quality team. Also, specific departments are being trained on the newly issued policies. Moreover, regularly we conduct online training on specific topics to all employees through our Cognito platform.

### Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users

All our business and compliance policies apply to all types of consumers and end users, there is no distinction or discrimination in terms of types of consumers.

However, we also have group policies, procedures, guidelines for certain consumer groups that are at greater risk, i.e. "Care of high-risk patients policy" or "Justification of exposure of women of childbearing age to ionizing radiation", "Management of patients with cardiac implantable electronic devices during radiotherapy", "Fall Risk Reduction Guideline", etc.

For specific impacts or risks, such as personal data management, we have Data Protection Policy and Identity, Access and Information Security Policy, that manages the related IROs.

Similarly, for impacts or risks related to health, safety and security of patients, we have a Clinical Incident Management policy, that manages related IROs

Lastly, for managing impacts or risks related to non-discrimination, we have the Code of Conduct and non-discrimination policy.

All Affidea policies and procedures at country level apply to all patients including those who are considered to be at risk or vulnerable.

### Policies to manage material impacts, risks and opportunities related to consumers and end-users

Affidea has a large set of policies & procedures related to clinical governance (i.e. medical standards), that are aligned with country medical regulations as well as group medical standards. These clinical standards are fundamental to how we operate our clinics and serve the patients, and to ensure high quality diagnostics and patient care.

Additionally, there are supporting policies to ensure patient data protection, cyber security, and employee's code of conduct that are widely distributed and expected to be adhered to by every employee working in Affidea. In a formal ESG commitment document that was drafted in 2024, the management board has pledged to ESG commitments, that also include commitments towards consumers and end users.

### Description of key contents of policy

Contents of code of conduct and other policies are described in ESRS 2, ESRS S4, and ESRS G1.

Following are our ESG commitments, that also apply to consumers & end users:

**Environmental Commitment:**

We aim to minimise our impact on the planet by taking climate action, implementing energy-saving measures, digitising processes to reduce paper usage, implementing waste recycling initiatives, and partnering with suppliers that focus on reducing their and our environmental footprint.

**Social Commitment:**

We create positive social impact by delivering best-in-class services, creating development opportunities for our employees, and engaging with our suppliers and communities beyond healthcare. We foster societal development and support the communities we are part of.

**Governance commitment:**

At Affidea, we uphold our commitment to the highest ethical standards in everything we do. Our governance structure, operating model, ethics framework and robust risk management and internal control processes support this commitment.

In 2024, Affidea also developed and implemented ESG principles, including an ESG considerations framework for new capex / opex spend, that requires any large purchases above management threshold must be assessed in line with the ESG principles, including specific environmental criteria.

## Description of scope of policy or of its exclusions

Affidea policies, ESG commitments, guiding principles and considerations apply to all countries and all legal entities.

## Description of most senior level in organisation that is accountable for implementation of policy

Group CEO, CFO (Management Board), with a delegated responsibility to the senior leadership team (SLT).

## Disclosure of third-party standards or initiatives that are respected through implementation of policy

Affidea guiding principles are inspired from the ESG commitments and targets of other similar sized healthcare companies.

## Description of consideration given to interests of key stakeholders in setting policy

All commitments and guiding principles are defined keeping in mind the interests and expectations of Affidea's key stakeholders.

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

Policies and procedures relevant for Affidea management, staff and shareholders are available on intranet. Policies applicable to external stakeholders (e.g. code of conduct) are also published on the company website.

## Description of relevant human rights policy commitments relevant to consumers and/or end-users

Affidea recognizes the Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance (text extracted from Affidea Code of Conduct document).

As mentioned in a previous disclosure, Affidea is committed to ensuring equitable access to high-quality medical services for all patients, regardless of their source of reimbursement—whether public or private. We believe in true medical access for all, upholding the principle that the quality of care should remain consistent and non-discriminatory across all patient groups.

There is no differentiation in the delivery of care based on gender, income, or any other factor. This commitment to equality is reflected in our adherence to international quality standards and accreditations. Our strong governance model, supported by a comprehensive Code of Conduct and Clinical Standards and Procedures, is aligned with the European Society of Radiology Safety Standards and International Patient Safety Goals. These frameworks ensure that our operations respect and protect the rights of all patients, promoting inclusivity, safety, and the highest standards of care.

## Disclosure of general approach in relation to respect for human rights of consumers and end-users

Affidea recognizes the Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance (text extracted from Affidea Code of Conduct document).

Although Affidea does not have a specific statement aligned with the 3 mentioned standards in the CSRD, Affidea's acknowledgement of the UDHR also imply that its Code of Conduct is informed by the principles outlined there. This proves Affidea's commitment to aligning with internationally recognised Human Rights Standards. We will further develop our policies in 2025 to align them with the mentioned standards.

## Disclosure of general approach in relation to engagement with consumers and/or end-users

Engagement with consumers and end-user occurs at multiple layers of the organization and in multiple ways, for example:

**Engagement with patients:**
At clinic level engagement starts with our call center staff (on phone, prior to the visit), and with our receptionists, lab technicians, radiographers or doctors who attend to the needs of the patients during their visit.
Engagement also occurs in the form of patient feedback, that could be left at the time of leaving clinic (online form) or in the form of an email or review on social media platforms. Sometime feedback is also provided via phone.
Separately, we are engaging with our patients and potential patients through our online channels, offering educational information on our country websites, social media channels, YouTube through videos with our doctors, or targeted newsletters to the costumers that gave their signed consent to receive information from Affidea.

**Engagement with referring doctors:**
At country level, referring doctors are periodically visited by Affidea sales team or medical representatives to inform about our service capabilities and latest technological advancements.
Engagement with referring doctors also occurs annually in the form of a satisfaction survey, which is organized centrally by the group marketing team, and supported by the country management.

**Engagement with payors & commissioners:**
Occurs mainly via our sales team in each country, who strives to understand their needs, have contracts in place, and provide them the relevant reporting / invoicing.

## Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts

Affidea recognizes the Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance (text extracted from Affidea Code of Conduct document).

Affidea has various compliance policies to manage material impacts on consumer and end-users: Code of Conduct, Anti-Bribery, Business Party Selection, Conflict of Interests, Gifts and Hospitality, Whistle Blowing. They include proper definitions of offences and give practical illustrations as well as indicate red flags. Please see attached as examples: Code of Conduct, Anti-Bribery, Whistle Blowing Policy.

Compliance related concerns or incidents may be reported in accordance with Whistleblowing policy. The contact point is ethicsline or General Counsel and CEO and corporate HR. The Whistleblowing policy covers all compliance related topics. Besides that Affidea established a specific reporting tool for clinical incidents called AIMS. We have also various, dedicated reporting lines regarding clinical incidents, PDBs, claims & litigation etc.

## Description of whether and how policies are aligned with relevant internationally recognised instruments

Affidea has committed to international commitments or standards (ICC and ISO). Affidea routinely participates in international quality control programs and its European centers have received ISO, UEMS/EBNM and JCI accreditations in some countries, which credit the highest level of quality standards in diagnostic imaging and nuclear medicine.

The company has a strong governance model in place, supported by its code of conduct, and clinical standards and procedures that follow the European Society of Radiology Standard Safety Standards and International Patient Safety Goals.

## Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve consumers and/or end-users

If any cases are observed, they will be reported in year end.

## Disclosure of explanations of significant changes to policies adopted during reporting year

No specific changes to consumer and end-related approached or policies in 2024.

### The policy may take the form of a stand-alone policy regarding consumers and/or end-users or be included in a broader document such as a code of ethics or a general sustainability policy that has already been disclosed by the undertaking as part of another ESRS. In those cases, the undertaking shall provide an accurate cross-reference to identify the aspects of the policy that satisfy the requirements of this Disclosure Requirement.

Affidea has various compliance policies to manage material impacts on consumer and end-users: Code of Conduct, Anti-Bribery, Privacy, Conflict of Interests, Gifts and Hospitality, Whistle Blowing. They include proper definitions of offences and give practical illustrations as well as indicate red flags. Please see attached as examples: Code of Conduct, Anti-Bribery, Whistle Blowing Policy.

### In disclosing its alignment of its policies with the UN Guiding Principles on Business and Human Rights, the undertaking shall consider that the Guiding Principles refer to the International Bill of Human Rights, which consists of the Universal Declaration of Human Rights and the two Covenants that implement it, and may disclose its alignment with these instruments.

Affidea has committed to international commitments or standards (ICC and ISO). Affidea routinely participates in international quality control programs and its European centers have received ISO, UEMS/EBNM and JCI accreditations in some countries, which credit the highest level of quality standards in diagnostic imaging and nuclear medicine.

The company has a strong governance model in place, supported by its code of conduct, and clinical standards and procedures that follow the European Society of Radiology Standard Safety Standards and International Patient Safety Goals.

### When disclosing how external facing policies are embedded, the undertaking may, for example, consider internal facing sales and distribution policies and alignment with other policies relevant to consumers and/or end-users. The undertaking shall also consider its policies for safeguarding the veracity and usefulness of information provided to potential and actual consumers and/or end-users, both before and after sale.

Affidea has various compliance policies to manage material impacts on consumer and end-users: Code of Conduct, Anti-Bribery, Privacy, Conflict of Interests, Gifts and Hospitality, Whistle Blowing. They include proper definitions of offences and give practical illustrations as well as indicate red flags. Please see attached as examples: Code of Conduct, Anti-Bribery, Whistle Blowing Policy.

### Disclosure on an illustration of the types of communication of its policies to those individuals, group of individuals or entities for whom they are relevant

Voluntary disclosure, to be disclosed in 2025.

## 7.4.1.4.3 Processes for engaging with consumers and end-users about impacts

### Does the undertaking disclose general processes for engaging with consumers & end user representatives regarding actual and potential material impacts on them

Yes, the engagement occurs at various layers and in multiple ways as disclosed earlier.

### Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts

In addition to strategic review performed by LEK, that resulted in revised business model and strategy, our clinics periodically receive feedback from patients or referring doctors. Such feedback, whether positive or negative, is recorded in a formal compliment and complaints register, and country quality team independently reviews every complaint, assigns actions to respective functional owner to address the feedback.
E.g. majority of complaints relate to waiting times in our clinics after the patient arrives, which are discussed with the operations team to understand why a certain patient (if identified) complained, and how we can further improve the appointment booking process, so that patients don't have to wait longer than needed. Waiting times will also be an ESG target that will be tracked and reported in 2025.

### Engagement occurs with consumers and end-users or their legitimate representatives directly, or with credible proxies

Engagement mostly occurs directly with the consumers and end users to understand our own operational performance, but for strategic decision making, e.g. market dynamics, healthcare trends etc. engagement is performed by an independent third-party, who collects data from credible proxies, such as consumer focus groups, other healthcare service providers, and payors & commissioners.

### Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement

Engagement with consumers and end-user occurs at multiple levels and stages of the patient journey within organization and in multiple ways, for example:

**Engagement with patients:**
At clinic level engagement starts with our call center staff (on phone, prior to the visit), and with our receptionists, lab technicians, radiographers or doctors who attend to the needs of the patients during their visit.
Engagement also occurs in the form of patient feedback, that could be left at the time of leaving clinic (online form) or in the form of an email or review on social media platforms. Sometime feedback is also provided via phone.
Separately, we are engaging on a daily basis with our patients and potential patients through our online channels, offering educational information on our country websites, social media channels, YouTube through videos with our doctors, or targeted newsletters to the customers that gave their signed consent to receive information from Affidea.

**Engagement with referring doctors:**
At country level, referring doctors are periodically visited by Affidea sales team or medical representatives to inform them about our service capabilities and latest technological advancements.
Engagement with referring doctors also occurs annually in the form of a satisfaction survey, which is organized centrally by the group marketing team, and supported by the country management.

**Engagement with payors & commissioners:**
Occurs mainly via our sales team in each country, who strives to understand their needs, have contracts in place, and provide them the relevant reporting / invoicing.

### Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens and that results inform undertakings approach

Most senior executive to ensure engagement with patients occurs: Senior Vice President of Marketing & Communications. At countries level this is the country CEO together with the Country Marketing Director and Country Operational Director.

Most senior executive to ensure engagement results inform undertakings strategy & approach: Senior Vice President of Strategic Business Projects as well as the Clusters CEOs.

**Overall responsible:** Group CEO

## Disclosure of how effectiveness of engagement with consumers and end-users is assessed

Effectiveness of engagement, and related actions is assessed in two ways:

Financial results of a new business approach (informed by strategic business review), and

Improvement in NPS score (net promoter score), which is bases on patient satisfaction survey and referring doctors survey results.
On the online channels, we are tracking certain KPIs that are showing us the engagement level: Number of followers per country on social media channels, engagement rate, Click through Rate (CTR), on our websites - number of users per month and YoY, Bounce Rate, time spent on website, the number of pages the user visited; on the newsletters we are looking at Open Rate, CTR.

## Disclosure of steps taken to gain insight into perspectives of consumers and end-users / consumers and end-users that may be particularly vulnerable to impacts and (or) marginalised

Affidea's approach to identify needs / perspectives of consumers and end-users with particular characteristics include:

**Vulnerability assessments:** Affidea is committed to delivering high-quality medical services to all patients, regardless of their origin or source of reimbursement. Each year, in most countries where we operate, national healthcare statistics reports are published. These reports, often provided by national authorities, detail the prevalence of co-morbidities based on factors such as disease type, geographical region, and income level. Such data is highly relevant for Affidea as it enables us to identify specific vulnerable groups—such as elderly patients, individuals with chronic conditions, or those living in underserved regions—who may face challenges in accessing healthcare or receiving accurate diagnoses. For instance, in Romania, the National Institute of Statistics publishes annual reports that offer valuable insights into healthcare trends and vulnerabilities. Similarly, data from organizations such as the OECD provides a broader context, helping us to benchmark and better understand healthcare disparities across different regions. These insights inform our strategies to enhance accessibility and ensure equitable care for all patient demographics.

**Clinical guidelines:** Tailored care processes for high-risk patients, ensuring that their diagnostic and treatment needs are met safely and effectively. For example, in Affidea Ireland, we used an identification yellow bracelet that is effective in identifying potential falls among high-risk patients.

**Data analytics:** Using patient feedback to identify trends in service access, quality, and outcomes

**Personalisation:** We have created specific clinical patient-pathways for different specialties (breast, neurology, gastro, cancer care etc.) that addresses the specific medical needs and the clinical journey recommended for each area. Moreover, we have started in some of our countries (i.e. Romania and Lithuania) to personalise our marketing approaches, profiling patients that gave their marketing consent and targeting them with personalised and relevant information for them and for their medical needs.

**Training of staff:** Specific training for communicating and treating vulnerable groups with utmost care.

**Partnerships with Community Organizations:** Where relevant, engaging with local NGOs to understand specific regional or demographic healthcare needs.

## Statement in case the undertaking has not adopted a general process to engage with consumers and/or end-users

Not applicable as Affidea has already adopted process.

## 7.4.1.4.4 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

### Does the undertaking disclose processes it has in place to provide for or cooperate in the remediation of negative impacts on consumers and end-users that the undertaking is connected with

Yes, various processes and procedures in place to manage/remediate potentially material negative impacts, such as:

Clinical governance standards and policies, maintained and monitored by the global and country medical and quality team.

Global data protection policy and program, lead by global data protection officer (G-DPO), and country data protection officers (C-DPOs), who are responsible to manage patient data safely and in compliance with data protection regulations.

Cyber security policies, managed by global CISO (corporate information security officer).

### Does the undertaking disclose information on channels available to consumers and end-users to raise concerns and have them addressed?

Yes, consumers and end users can raise their concerns in following ways:

Call us anonymously or with identity at our call centers;

Raise a concern at the reception of the clinic;

Report via anonymous or with identified email address, dedicated email accessible to quality team in every country;

Write an email to our integrity/ethics line, if related to whistleblowing;

Lastly, they can publicly raise their concerns via social media platforms, such as our company google page, Facebook or Instagram or through the Patient Satisfaction Survey which they can complete after their visit.

### Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has identified that it connected with a material negative impact on consumers and end-users

Relevant clinical, data protection, and cyber security standards and policies mentioned above contain approach and processes to remedy material negative impacts.

All concerns or complaints raised by consumers and end users are recorded in a country specific complaints register, which is independently reviewed by the country quality team members, and directed for action / remediation to relevant function or department manager. Where relevant, the reporting consumer is informed about the actions that the company is taking to address their concerns, on a case by case basis.

### Disclosure of specific channels in place for consumers and end-users to raise concerns or needs directly with undertaking and have them addressed

Consumers and end users can raise their concerns in following ways:

Call us anonymously or with identity at our call centers;

Raise a concern at the reception of the clinic;

Report via anonymous or with identified email address, dedicated email accessible to quality team in every country;

Write an email to our integrity/ethics line, if related to whistleblowing;

Lastly, they can publicly raise their concerns via social media platforms, such as our company google page, Facebook or Instagram, or through the Patient Satisfaction Survey which they can complete after their visit.

### Disclosure of processes through which undertaking supports or requires availability of channels

As explained in previous disclosure, various channels are available for reporting and addressing consumer concerns.

## Disclosure of how issues raised and addressed are tracked and monitored and how effectiveness of channels is ensured

All concerns or complaints raised by consumers and end users are recorded in a country specific complaints register, which is independently reviewed by the country quality team members, and directed for action / remediation to relevant function or department manager. Where relevant, the reporting consumer is informed about the actions that the company is taking to address their concerns, on a case by case basis.

Effectiveness of such channels is ensured by reporting all complaints, their status, action taken in the monthly management report the country management, and to the management board in bi-monthly country board meetings.

## Disclosure of how it is assessed that consumers and end-users are aware of and trust structures or processes as way to raise their concerns or needs and have them addressed

Every clinic has a feedback mechanism (online form, or paper form), which is visible at the reception desk, so that consumers can provide general feedback or raise a complaint. Social media pages (on Google, Facebook) are open to general public, anyone can write a feedback to Affidea.

When a formal complaint is received (e.g. via email), it is acknowledged by responding to the complainant, and when a remediation action is taken for that specific complaint, the complainant is informed of the action.

## Policies regarding protection against retaliation for individuals that use channels to raise concerns or needs are in place

Non-retaliation process is mainly applicable for whistleblower or anonymous serious concerns, these are addressed in accordance with the whistleblower procedures, that ensure no retaliation. The policy applies to both internal as well as external stakeholders.

## Statement in case the undertaking has not adopted a general process to engage with consumers and/or end-users

Not applicable as Affidea has already adopted process

## Disclosure of timeframe for channel or processes for raising concerns to be in place

Not applicable as Affidea has already adopted process

## Disclosure of whether and how consumers and/or end-users are able to access channels at level of undertaking they are affected by

Various channels available to consumers to raise concern, as explained in a previous disclosure.

## Consumers and end-users are allowed to use anonymously channels to raise concerns or needs

Various channels available to consumers to raise concern, as explained in a previous disclosure.

## Number of complaints received from consumers and/or end users during the reporting period

Number will be reported at the end of the year.

## 7.4.1.4.5 Action plans and resources to manage its material impacts, risks, and opportunities related to consumers and end-users

### Does the undertaking disclose action to address material impacts on consumers and end-users, and to manage material risks and pursue material opportunities related to consumers and end-users

Yes, there is periodic monitoring and actions to manage and mitigate potential positive and negative impacts on consumers & end-users, such as ensuring: quality of diagnostic imaging and clinical outcomes, privacy of medical and personal data, safety and security of patients while visiting our clinics, providing reliable and quality care to communities in which we operate, providing feedback channels to consumers & end-users, and taking action on their feedback.

### If so, does the undertaking disclose the effectiveness of those actions?

Yes, the effectiveness of actions is tracked via internal and external audits, and results are disclosed to country management and the group supervisory committees.

### Description of action planned or underway to prevent, mitigate or remediate material negative impacts on consumers and end-users

Actions to prevent, mitigate or remediate potential material negative impacts on consumers & end-users include:

All medical equipment is periodically maintained and certified in accordance with country medical & clinical standards, to ensure the quality of clinical outcomes is not compromised due to equipment malfunction.

Regular training of staff to prevent diagnostic errors or delays in reporting. When an error does occur, it is recorded in Affidea incident management system (AIMS), reported to senior management, and corrective actions are taken.

Regular training and awareness campaigns on personal and sensitive data protection, and monthly monitoring, at group level and country level, of all data privacy breaches. When occurred, data breaches are investigated, and reported to data protection authorities in alignment with the applicable regulatory thresholds.

Regular monitoring of patient and referring doctor's feedback, and actions planned and executed to address their comments for a better experience.

Continuous investment in new digital tools for the digital patient journey (online booking, online results, online check in) to improve their digital experience as well as in new AI solutions to improve diagnostic accuracy or operational efficiency.

### Description of action to provide or enable remedy in relation to an actual material impact

An example of an actual negative impact is 'erroneous mis-delivery of a patient diagnostic report', which means a reception employee at Affidea clinics by mistake handed the medical report of one patient to another, which if read by the other patient, could result in a potential data breach. In such cases, the remedial action is to notify the correct patient about a potential data breach, inform the country DPO (data protection officer), who in turn informs the global DPO and collectively it is decided whether such incident requires a data protection authority notification. All such incidents are recorded and reported in the global PDB (personal data breach) register.

### Disclosure of key action

Periodic patient satisfaction survey, and timely addressing any complaints received from patients.

### Description of scope of key action

All patients visiting Affidea clinics.

### Time horizon under which key action is to be completed

One month after a complaint is received.

## Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

When a complaint is received it is analysed by the quality function, medical team and administrative staff, and results are communicated back to the patient.

## Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

2024 is the first year.

## Disclosure of the type of current and future financial and other resources allocated to the action plan

No specific resources, budget for patient satisfaction survey, referring doctors survey, and addressing patient complaints is managed within the country / clinic general budget.

## Current financial resources allocated to action plan (Capex)

No specific resources, budget for patient satisfaction survey, referring doctors survey, and addressing patient complaints is managed within the country / clinic general budget.

## Current financial resources allocated to action plan (Opex)

No specific resources, budget for patient satisfaction survey, referring doctors survey, and addressing patient complaints is managed within the country / clinic general budget.

## Future financial resources allocated to action plan (Capex)

No specific resources, budget for patient satisfaction survey, referring doctors survey, and addressing patient complaints is managed within the country / clinic general budget.

## Future financial resources allocated to action plan (Opex)

No specific resources, budget for patient satisfaction survey, referring doctors survey, and addressing patient complaints is managed within the country / clinic general budget.

## Description of additional initiatives or processes with primary purpose of delivering positive impacts for consumers and end-users

Positive impacts from Affidea's activities include:

- Timely and accurate Diagnostics: Leading to better treatment outcomes and patient satisfaction.
- Innovative Technologies: AI-based diagnostic solutions that enhance precision and speed.
- Digitisation: A digital patient journey with possibility to make online appointments, to get the results quickly and safely online and do the online check-in improve significantly patients experience, offering them a swift access to care and avoiding waiting time at the reception for registration.
- Expanding Healthcare Access: New medical centers in underserved regions improve healthcare accessibility. Digitisation across the patient journey also supports better access to high-quality care as patients can make their appointment with one click and can receive their medical results safely online, being able to share them with their doctor, which improves access to faster treatment.
- Community engagement: By supporting local communities and public health initiatives, Affidea promotes health education and better access to medical services.

Positively affected groups include:

- Patients: Receive quicker care and better treatment outcomes.
- Referring Doctors: Benefit from accurate, timely results to guide medical decisions.
- Payors/Commissioners: Improve healthcare delivery efficiency through trusted medical services.

## Description of how effectiveness of actions or initiatives in delivering outcomes for consumers and end-users is tracked and assessed

Effectiveness of actions is tracked and assessed in multiple ways:

Effectiveness of clinical governance processes and quality of clinical process outcomes is assessed by the medical council via periodic peer reviews among various medical council members, and through internal clinical governance & quality audits to ensure all applicable processes and standards are correctly followed by the clinical staff.

Effectiveness of data protection processes is monitored by the DPOs at country and group level, and periodic spot data protection audits are performed by quality and internal audit team during their clinic visits.

Effectiveness of safety and security procedures is monitored by the operational and IT teams, to ensure physical safety and cyber security of the patient data.

Effectiveness of other supporting business processes (order to cash, purchase to pay, record to report, hire to retire) and compliance trainings is audited by the internal audit department in their periodic country audits.

## Description of approach to identifying what action is needed and appropriate in response to particular actual or potential material negative impact on consumers and end-users

Affidea has an enterprise risk management framework, that is managed at group level, identifying key risks and controls related to overall business model and strategy. The group risk register is updated annually via a global risk survey, in which all country managers participate and assess key risks and controls. This provides a broader understanding of potential impact, risks and opportunities to serve our consumers and end-users.

Additionally, functional risk registers are also maintained by: the clinical governance and quality team (to address any potential impacts or risks related to clinical processes). Cyber security team maintains a risk register for IT and cyber risks, and data protection team maintains a risk overview of potential data protection impacts, risks and opportunities.

Depending on the type of impact, risk or opportunity, actions are planned or taken by the respective functional team.

## Description of approach to taking action in relation to specific material impacts on consumers and end-users

### Marketing Practices

**Transparency:** All marketing materials are clear, concise, and free of misleading claims, ensuring consumers understand the medical services, their potential benefits or risks.
**Accessibility of Information:**
We have redesigned our websites to enhance accessibility, incorporating font options for users with readability challenges, such as dyslexia. In addition, we are working on audio functionality to make our website accessible to visually impaired users, ensuring an inclusive experience for all.
Consumer Education: Our marketing campaigns educate consumers on the importance of prevention, early diagnosis and how to take care of their health and well-being effectively and responsibly, empowering them to make informed decisions.
Sustainability Integration: In several countries, we have replaced physical CDs with online results and resources, significantly reducing plastic usage and contributing to a more sustainable consumption model. This shift benefits both the environment and consumers by providing convenient, digital access to results.

## Description of approach to ensuring that processes to provide or enable remedy in event of material negative impacts on consumers and end-users are available and effective in their implementation and outcomes

Relevant clinical, data protection, whistleblower and cyber security standards and policies mentioned above contain approach and processes to remedy material negative impacts. All concerns or complaints raised by consumers and end users are recorded in a country specific complaints register, which is independently reviewed by the country quality team members, and directed for action / remediation to relevant function or department manager. Where relevant, the reporting consumer is informed about the actions that the company is taking to address their concerns, on a case by case basis.

As mentioned earlier, depending on the type of impact, risk or opportunity, remedial actions are planned or taken by the respective functional team.

Effectiveness of actions is tracked and assessed in multiple ways:

- Effectiveness of clinical governance processes and quality of clinical process outcomes is assessed by the medical council via periodic peer reviews among various medical council members, and through internal clinical governance & quality audits to ensure all applicable processes and standards are correctly followed by the clinical staff.
- Effectiveness of data protection processes is monitored by the DPOs at country and group level, and periodic spot data protection audits are performed by quality and internal audit team during their clinic visits.
- Effectiveness of safety and security procedures is monitored by the operational and IT teams, to ensure physical safety and cyber security of the patient data.
- Effectiveness of other supporting business processes (order to cash, purchase to pay, record to report, hire to retire) and compliance trainings is audited by the internal audit department in their periodic country audits.

## Description of what action is planned or underway to mitigate material risks arising from impacts and dependencies on consumers and end-users and how effectiveness is tracked

As mentioned earlier, depending on the type of impact, risk or opportunity, remedial actions are planned or taken by the respective functional team. Effectiveness of actions is tracked and assessed in multiple ways:

- For specific impacts or risks, such as personal data management, we have Data Protection Policy and Identity, Access and Information Security Policy, that manages the related IROs. Similarly, for impacts or risks related to health, safety and security of patients, we have a Clinical Incident Management policy, that manages related IROs. Lastly, for managing impacts or risks related to non-discrimination, we have the Code of Conduct and non-discrimination policy.
- Effectiveness of clinical governance processes and quality of clinical process outcomes is assessed by the medical council via periodic peer reviews among various medical council members, and through internal clinical governance & quality audits to ensure all applicable processes and standards are correctly followed by the clinical staff.
- Effectiveness of data protection processes is monitored by the DPOs at country and group level, and periodic spot data protection audits are performed by quality and internal audit team during their clinic visits.
- Effectiveness of safety and security procedures is monitored by the operational and IT teams, to ensure physical safety and cyber security of the patient data.
- Effectiveness of other supporting business processes (order to cash, purchase to pay, record to report, hire to retire) and compliance trainings is audited by the internal audit department in their periodic country audits.

## Description of what action is planned or underway to pursue material opportunities in relation to consumers and end-users

Consumers and end users related opportunities, that were identified during the double material assessment relate mainly to following topics. Affidea will analyse these opportunities in each of its markets and will implement relevant actions, where applicable:
**Financial:** improved financial results for Affidea when its services are appreciated by the patients. This can be in the form of new contracts with public health authorities, insurance companies or out of pocket patients.
**Enhanced healthcare:** Opportunity for Affidea to positively influence the social inclusion of their consumers and end-users through their social engagements which sparks dialogue and awareness around unspoken issues, thus tapping into broader customer groups and increasing customer trust and loyalty, ultimately leading to an increase in sales.
**Access to growth capital:** More confidence in Affidea's services means enhance market reputation, which results in new opportunities for growth and access to growth capital.

Some examples of potential actions, that provide opportunities to create further positive impacts from Affidea's activities include:

- Improving timely and accurate diagnostic reporting: Leading to better treatment outcomes and patient satisfaction, which in the end results in better financial returns for the company.
- Implementation of innovative technologies: AI-based diagnostic solutions that enhance precision and speed, as well as wider implementation of tele-radiology services to cater to the needs of remotely located patients, also extending our financial portfolio of returns.
- Expanding Healthcare Access: New medical centers in underserved regions improve healthcare accessibility. Also, in several countries we introduced the home care service, which allows us to see and offer certain medical services to patients who cannot leave their homes or have difficulty in travelling to the center.
- Digitisation across the patient journey also supports better access to high-quality care as patients can make their appointment with one click and can receive their medical results safely online, being able to share them with their doctor, which improves access to faster treatment.
- Community engagement: By supporting local communities and public health initiatives, Affidea promotes health education and better access to medical services.

## Disclosure of how it is ensured that own practices do not cause or contribute to material negative impacts on consumers and end-users

Affidea has a large set of policies & procedures related to clinical governance (i.e. medical standards), that are aligned with country medical regulations as well as group medical standards. These clinical standards are fundamental to how we operate our clinics and serve the patients, and to ensure high quality diagnostics and patient care, without negatively impacting consumers & end-users.

Additionally, there are supporting policies to ensure patient data protection, cyber security, and employee's code of conduct that are widely distributed and expected to be adhered to by every employee working in Affidea.

Affidea routinely participates in international quality control programs and its European centers have received ISO, UEMS/EBNM and JCI accreditations in some countries, which credit the highest level of quality standards in diagnostic imaging and nuclear medicine.

## Disclosure of severe human rights issues and incidents connected to consumers and/or end-users

Incidents (if any), will be disclosed at the end of the year.

## Disclosure of resources allocated to management of material impacts

The main resources to manage material impacts so far have been in ensuring sufficient staff levels in clinical governance and quality teams. Each country has, at minimum, a quality manager, who sometime also acts as the data protection officer. They monitor / mitigate potential impacts on consumers related to quality of clinical outcomes and data protection. Actual service quality is delivered and monitored by a dedicated operations team to ensure independence of quality team actions.

Quality team also organizes periodic trainings and internal audits to ensure processes are known and followed by the staff.

There are also resources invested in sales and marketing teams in each country, that are the primary contacts for managing and monitoring referring doctors' needs and service satisfaction, as well as periodically reviewing the patient satisfaction results, and taking necessary actions. The marketing teams at country level are also the ones ensuring the engagement with patients on our online channels (website, social media, CRM, Newsletters).

## Disclosure of general and specific approaches to addressing material negative impacts

Affidea has a large set of policies & procedures related to clinical governance (i.e. medical standards), that are aligned with country medical regulations as well as group medical standards. These clinical standards are fundamental to how we operate our clinics and serve the patients, and to ensure high quality diagnostics and patient care, without negatively impacting consumers & end-users.

Additionally, there are supporting policies to ensure patient data protection, cyber security, and employee's code of conduct that are widely distributed and expected to be adhered to by every employee working in Affidea.

Affidea routinely participates in international quality control programs and its European centers have received ISO, UEMS/EBNM and JCI accreditations in some countries, which credit the highest level of quality standards in diagnostic imaging and nuclear medicine.

For specific impacts or risks, such as personal data management, we have Data Protection Policy and Identity, Access and Information Security Policy, that manages the related IROs. Similarly, for impacts or risks related to health, safety and security of patients, we have a Clinical Incident Management policy, that manages related IROs. Lastly, for managing impacts or risks related to non-discrimination, we have the Code of Conduct and non-discrimination policy.

## Disclosure of initiatives aimed at contributing to additional material positive impacts

Affidea's main contribution towards society in general and our patients in particular is our understanding of what the patients need, and whether Affidea fulfills those needs is important for us to be able to deliver a seamless consumer experience, that is why all Affidea clinics provide an opportunity to share patient feedback via a satisfaction survey mechanism, both online and offline, thereby creating potential positive impact on health of patients.

Affidea also offers health seminars and information sessions for both patients and referring doctors to share latest trends and positive health behaviours. Medical information diagnosed by Affidea is crucial from the patient's health status point of view, and enables referring doctor to make a better-informed decision, therefore creating a positive impact for the referring doctors and for the patients.

Affidea treats all patients equally. There is an integrity line and procedure to anonymously report workplace related code of conduct breaches, which includes incidents of discrimination, harassment or violence at Affidea clinics. Providing the patients equal opportunity creates a positive impact on the consumers and the company reputation.

## Disclosure of how far undertaking has progressed in efforts during reporting period

Managing our consumers and end-users, and preventing any material negative impacts is an ongoing activity, which is part of various business procedures. This remains a continuous activity.

## Disclosure of aims for continued improvement

As a purpose-driven company, at Affidea, we believe it is our responsibility, to create sustainable value for our patients, employees, our partners, the communities we are part of and our shareholders. We will continue investing in innovative and digital solutions to improve our operational efficiency and enhance medical outcomes while offering an outstanding patient experience. Further, our management has pledged to following commitments:

**Environmental Commitment**
We aim to minimise our impact on the planet by taking climate action, implementing energy-saving measures, digitising processes to reduce paper usage, implementing waste recycling initiatives, and partnering with suppliers that focus on reducing their and our environmental footprint.

**Social Commitment**
We create positive social impact by delivering best-in-class services, creating development opportunities for our employees, and engaging with our suppliers and communities beyond healthcare. We foster societal development and support the communities we are part of.

**Governance commitment**
At Affidea, we uphold our commitment to the highest ethical standards in everything we do. Our governance structure, operating model, ethics framework and robust risk management and internal control processes support this commitment.

# 7.4.1.4.6 Targets set to manage material impacts, risks and opportunities related to consumers and end-users

## Does the undertaking disclose targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Yes, Affidea has defined ESG targets for 2025 onwards, some of which will specifically track consumers and end users related metric, such as waiting times, number of incidents related to data privacy, and safety of patients.

## Targets set to manage material impacts, risks and opportunities related to consumers and end-users

Affidea has defined ESG targets for 2025 onwards, some of which will specifically track consumers and end users related metric, such as waiting times, number of incidents related to data privacy, and safety of patients. These will be tracked and reported structurally from next reporting cycle. We have a process of engaging with patients and referring doctors to understand what and where we can improve.

Moreover, through our Patients and Referrals Satisfaction Survey we collect detailed feedback from both patients and caregivers who, in some cases, accompany the patients from the first step, as well as from referring doctors, once per year.

We treat feedback from both patients and caregivers with equal importance, recognizing that caregivers often accompany and support patients throughout their journey. These insights are analyzed continuously to identify actionable improvements in our services. This holistic approach ensures that the needs of all stakeholders are reflected in our targets.

## Relationship with policy objectives

Aligned with Affidea ESG commitments.

## Measurable target

Annual patient satisfaction score, and referring doctors satisfaction score.

## Nature of target

Qualitative and quantitative.

## Description of scope of target

All Affidea clinics participate in satisfaction survey.

## Baseline value

This is the first year, so baseline will be 2024 data.

## Baseline year

2024

## Period to which target applies

Annual patient satisfaction score, and referring doctors satisfaction score.

## Indication of milestones or interim targets

This is the first year, so baseline will be 2024 data.

## Description of methodologies and significant assumptions used to define target

Affidea has defined ESG targets for 2025 onwards, some of which will specifically track consumers and end users related metric, such as waiting times, number of incidents related to data privacy, and safety of patients. These will be tracked and reported structurally from next reporting cycle. We have a process of engaging with patients and referring doctors to understand what and where we can improve.

Moreover, through our Patients and Referrals Satisfaction Survey we collect detailed feedback from both patients and caregivers who, in some cases, accompany the patients from the first step, as well as from referring doctors, once per year.

We treat feedback from both patients and caregivers with equal importance, recognizing that caregivers often accompany and support patients throughout their journey. These insights are analyzed continuously to identify actionable improvements in our services. This holistic approach ensures that the needs of all stakeholders are reflected in our targets.

## Target related to environmental matters is based on conclusive scientific evidence

Environmental targets will be mostly related to reduction of GHG emissions, which are indeed based on scientific GHG protocol.

## Disclosure of how stakeholders have been involved in target setting

Patient satisfaction survey results and patient complaints are the main source of understanding what the patients need and how they perceive our service. This gives us the indication on what targets we should set and which metrics we should aim to continuously improve.

Similarly, referring doctors satisfaction survey results provide us opportunities for further improving our service towards them.

## Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data

No changes in 2024.

## Description of performance against disclosed target

This is the first year, so performance will be monitored next year.

## Disclosure of how consumers and end-users were engaged directly in setting targets

Patient satisfaction survey results and patient complaints are the main source of understanding what the patients need and how they perceive our service. This gave us the indication on what targets we should set and which metrics we should aim to continuously improve.

Similarly, referring doctors satisfaction survey results provide us opportunities for further improving our service towards them.

## Disclosure of how consumers and end-users were engaged directly in tracking performance against targets

Satisfaction surveys organized at clinic level, and verbal feedback received in the call center or clinic reception.

## Disclosure of how consumers and end-users were engaged directly in identifying lessons or improvements as result of undertaking's performance

Affidea actively engages consumers and end-users to identify lessons and drive improvements in its services. Our ongoing satisfaction surveys are analysed on a weekly basis and are part of the country management meetings discussions, where management can identify the pain points of our patients and they can decide on the required improvements. The same is valid for referring doctors satisfaction survey which we are undertaking once per year and from which we can understand where we can improve our services, based on doctors' feedback, as well as which new services we should introduce, as per their suggestions.

### Disclosures to be reported if the undertaking has not adopted targets

Affidea has defined ESG targets for 2025 onwards, some of which will specifically track consumers and end users related metric, such as waiting times, number of incidents related to data privacy, and safety of patients. These will be tracked and reported structurally from next reporting cycle.

## 7.4.1.5 Governance Information: Business Conduct

## 7.4.1.5.1 Ethical conduct oversight

### Disclosure of role of administrative, management and supervisory bodies related to business conduct

Affidea's group CEO, who is also the chairman of Management/Executive Board, is overall responsible for business conduct. Specific administrative and compliance related responsibilities are delegated to Country Managers, General Counsel, Chief Financial Officer, Chief Operations Officer, Chief HR Officer, Chief Medical Officer, Data Protection Officer, Director of Risk, Assurance & ESG, and Clinical Governance & Quality function at group and in the countries.

Affidea's administrative, management and supervisory bodies are committed to business conduct policies applicable to Affidea Group and their promotion among employees and contractors.

The management board, comprising the CEO and CFO, supported by the senior leadership team (SLT), proposes and executes actions related to business conduct, which are monitored by the supervisory board. Both are committed to ensure compliance with applicable regulations and internal policies.

The supervisory board has a dedicated Audit, Risk & Compliance (ARC) committee, comprising the selected members of the supervisory board, General Counsel and the Director of Risk & Assurance are permanent invitees. The committee reviews any business concerns, risks or audit findings periodically.

### Disclosure of expertise of administrative, management and supervisory bodies on business conduct matters

Affidea's Supervisory Board (SVB) has 5 members, 4 of which are representatives of the principal shareholder (GBL); each having broad financial, administrative and business management experience in managing/supervising multi-national companies for several years. One independent board member was until recently CEO of a global healthcare and consumer goods company. He has broad experience in leading multi-cultural, high performance teams, with hands-on financial and administrative management expertise, including issues related to compliance and business conduct. Three members of the supervisory board are part of the audit, risk and compliance committee (ARC), supervising any business conduct related concerns. Two are members of remuneration committee, and all are members of the investment committee.

Affidea's Management Board (MB) consists of the CEO and CFO, supported by the General Counsel, who acts as the secretary to both the supervisory and management board. The CEO and CFO have vast experience in leading large healthcare companies, including supervising and controlling matters of financial and business conduct. The chief general counsel periodically advises the management board on matters related to business conduct and compliance, and seeks external legal support where needed.

Affidea's Senior Leadership Team (SLT) comprising Country Managers, and corporate function leaders described earlier, acts as guardians of their respective country and functional compliance matters, ensuring overall Affidea business conduct.

### When describing the process to identify and assess material IROs, does the undertaking disclose all relevant criteria used in the process, including location, activity, sector and the structure of the transaction?

Yes, this was part of the double-materiality assessment, which was based on the ESRS guidance. For example, while identifying and assessing the impacts, risks and opportunities in Affidea's value chain to determine their materiality, we first focused on areas where impacts, risks and opportunities are most likely to arise, based on the nature of Affidea activities, business relationships, geographies and other concerned factors, such as the business model of the company, main sources of revenue and growth capital, governance structure and processes, including the codes of business conduct etc.

The identification of upstream, downstream and own operations related Affidea stakeholders was done in a collective manner, involving the management board as well as country management. The following stakeholder groups were identified as main stakeholders:

**Upstream:** i) Global equipment manufacturers or suppliers of related medical systems or spare parts or maintenance services, ii) Medical material suppliers, iii) Lenders or debt holders.

Downstream: i) patients & their families, ii) referring doctors, iii) payors and commissioners, iv) pharmaceutical companies for clinical studies, v) private companies for occupational health, vi) Waste collection companies, vii) general public infrastructure companies for employee and patient commute.

**Own operations:** i) Clinical & non-clinical staff, ii) management, iii) board members and shareholders.

Based on their involvement and influence on Affidea's business model, decision making, and ease of reach, key stakeholders, whose input is significant for double-materiality assessment were identified, and their input was assessed to arrive at the IROs. The detailed impact, risks and opportunities are described in the double-materiality assessment document. Some examples of business conduct related IROs are as follows:

- Affidea has a structured governance model, two-tier board structure, documented code of conduct, and open culture with regards to communication and adherence to our corporate values (our company name itself signifies our three values, Affinity, Fidelity, and Idea). Our staff is encouraged to raise concerns or complaints regarding non-adherence to values or code of conduct, thereby empowering them and creating a positive impact on own workforce.
- Our staff is annually trained on corporate code of conduct and other regulatory compliance matters, and they are encouraged to raise concerns or complaints regarding non-adherence to values or code of conduct. These are considered as incidents, and are recorded and investigated as per our incident / compliance management procedures.
- If Affidea fails to provide relevant trainings or if some employees do not participate on such trainings related to Affidea's values and code of conduct, then it can result in employees engaging in a bribery or corruption activities thereby leading to a negative impact on the broader society (including local community and on the regulators).
- Affidea has global procurement policy for large equipment. We only buy high quality, certified equipment, from large companies (e.g. GE, Siemens, Philips) that pay equal, if not higher attention to ESG matters. The equipment procured through these suppliers provide reliable diagnostic images or other type of health analysis, thereby creating a positive impact on the patients, own workforce, and referring doctors.

## 7.4.1.5.2 Policies and procedures

### Description of how the undertaking establishes, develops, promotes and evaluates its corporate culture, i.e. the strategy to foster the corporate culture and how this strategy is implemented and how the outcomes is evaluated

At Affidea, we uphold our commitment to the highest ethical standards in everything we do. This is how we demonstrate our culture to care about our patients, colleagues, partners, stakeholders and society. We strive to communicate transparently, to act fairly and responsible, and to foster a safe and diverse work environment. We share our vision and processes openly - because we believe people deserve to know what we do to improve their life.

There is a comprehensive Code of Conduct document, that is widely distributed and expected to be adhered to by all employees. Our Code of Conduct represents our promise to always to do the things right. It is vital to our ongoing success, and is supported by other policies, such as Anti-bribery; Gifts and Hospitality; Conflict of Interest; Business Partner Selection Process; Whistle Blowing; Claims Reporting.

Affidea has established a whistleblowing reporting mechanism (ethics@affidea.com); which accommodates reporting both from internal and external stakeholders. Employees are trained on compliance related policies via dedicated platform as per Compliance Training (Cognito) Policy. Compliance related policies and ethicsline channel is easily available for employees via dedicated document management system (ADMS, and Cognito), and the code of conduct is also published on Affidea global website.
Retaliation against whistleblowers is strictly forbidden (Whistle Blowing policy). General Counsel should be informed on any retaliation actions and must ensure relevant protection of a whistleblower. Periodic internal audits are performed to ensure adherence to code of conduct, and other business policies and procedures.

### Description of the mechanisms for identifying, reporting and investigating concerns about unlawful behaviour or behaviour in contradiction of its code of conduct or similar internal rules

Country management and line management is in principle responsible to ensure Affidea conducts its business in line with internal and external policies, procedures and applicable regulations.

In case of breaches of business conduct that are not identified or reported via the management, anonymous whistle-blower / ethics line is designed to report matters of concern. Concerns may also be reported via yearly compliance questionnaire or directly to General Counsel or Supervisor. Internal and external audits are also targeted to identify any actual or potential unlawful behaviours. Compliance related incidents may be reported in accordance with Whistleblowing policy and procedure. The contact point is ethicsline or General Counsel and CEO and corporate HR.

The Whistleblowing policy covers all compliance related topics. Besides that Affidea established a specific reporting tool for clinical incidents called AIMS. We have also various, dedicated reporting lines regarding clinical incidents, Personal Data Breaches, Claims & litigation etc., under separate policies.

When identified and reported, investigation led by General Counsel and HR function starts in accordance with Whistle-Blowing procedure. First, an initial assessment is done to determine the scope of any investigation and will inform the Whistle Blower of the outcome of the assessment. The reporter may be required to attend additional meetings in order to provide further information. In some cases, Affidea may appoint an investigator or team of investigators (which may include other appropriate Affidea Personnel with relevant experience of investigations or specialist knowledge of the subject matter). The investigator(s) may make recommendations for change to enable the Affidea Group to minimise the risk of future wrongdoing. The Affidea Group keeps Whistle Blowers informed of the progress of any investigation and its likely timescale.

## Description of how the undertaking establishes, develops, promotes and evaluates its corporate culture

Affidea is committed to delivering high-quality care and exceptional patient experiences to achieve the outcomes that matter to patients while creating opportunities for our employees and generating sustainable shareholder value. We believe everyone deserves better access to high-quality care. Our mission is to empower patients to make informed choices for their health and well-being, providing them fast access to a complete integrated care pathway from consultation, laboratory analysis and diagnostic services, in an out-of-hospital setting, close to home.

We have a large set of policies & procedures related to corporate governance, risk management and compliance, including medical standards, that are aligned with country medical regulations as well as group standards. These policies, procedures and standards are fundamental to how we operate our clinics and serve the patients, and to ensure high quality diagnostics and patient care.

Our commitment to responsible and sustainable business practices is embedded in our daily operations and deeply rooted in our culture and business Code of Conduct. Our structured governance model, two-tier board structure, documented code of conduct, and open culture with regards to communication and adherence to our corporate values (our company name itself signifies our three values, Affinity, Fidelity, and Idea) encourages staff to feel comfortable and confident about their work, and where necessary raise concerns or complaints regarding non-adherence to values or code of conduct.

The supervisory board has a dedicated Audit, Risk & Compliance (ARC) committee, comprising the selected members of the supervisory board, General Counsel and the Director of Risk & Assurance are permanent invitees. The committee is informed about any business concerns, risks or audit findings periodically. General Counsel and the Director of Risk & Assurance regularly report to the management board on audit, risks and compliance matters (board meetings) and have access to all operational data and information from all functions of the company.

Following are other measures to promote and evaluate corporate culture:

- Periodic code of conduct and other corporate culture trainings are organised for all staff, facilitated through a dedicated compliance training platform (Cognito).
- Annual compliance declaration by Cognito users in all countries.
- Quarterly high level re-validation of country risks, including people related risks.
- Detailed business process audits, as per annual internal audit plan.
- Periodic clinical and quality audits in each country, and globally.
- External financial, quality and safety audits.
- Anonymous whistle-blower / ethics line to report matters of concern.

## No policies on anti-corruption or anti-bribery consistent with United Nations Convention against Corruption are in place

Affidea has relevant policies on anti-corruption and anti-bribery, which are consistent with United Nations Convention against Corruption.

## Timetable for implementation of policies on anti-corruption or anti-bribery consistent with United Nations Convention against Corruption

Already implemented.

## Disclosure of safeguards for reporting irregularities including whistleblowing protection

Affidea has established a whistleblowing reporting mechanism (ethics@affidea.com); which accommodates and safeguards reporting both from internal and external stakeholders on any misconduct. All employees are periodically trained on code of conduct, that has references to whistle-blower policy. It is specifically mentioned in the whistle-blower policy that: the Whistle Blowing Policy applies to all employees, legal entities and business units belonging directly or indirectly to the Affidea Group. Protection under this Whistle Blowing Policy shall be also granted to natural persons such as candidates for employment; persons whose work-based relationship has ended; persons seeking to provide services for Affidea Group; volunteers and paid or unpaid trainees; shareholders and persons belonging to the administrative, management or supervisory bodies; consultants and self-employed persons providing their services for Affidea Group; freelance workers, contractors, subcontractors and suppliers as well as any persons working under the supervision and direction of contractors, subcontractors and suppliers.

Retaliation against whistleblowers is strictly forbidden (Whistle Blowing policy). General Counsel should be informed on any retaliation actions and must ensure relevant protection of a whistleblower. Periodic internal audits are performed to ensure adherence to code of conduct, and other business policies and procedures.

## No policies on protection of whistleblowers are in place

Relevant policies on protection of whistle-blowers are in place (Whistle-Blowing Policy and Whistle-Blowing Procedure)

## Timetable for implementation of policies on protection of whistleblowers

Already implemented.

## Undertaking is committed to investigate business conduct incidents promptly, independently and objectively

Yes, our whistle-blowing policy has the following purpose / commitments:

a) To encourage Affidea Personnel to report actual or suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
b) To provide Affidea Personnel with guidance as to how to raise those concerns.
c) To reassure Affidea Personnel that they should be able to raise genuine concerns in good faith (even if they turn out to be mistaken) without fear of reprisals.

When identified and reported, investigation led by General Counsel and HR function starts in accordance with Whistle-Blowing procedure, as follows:

**Stage 1:** An initial assessment is done to determine the scope, and whether an independent investigation is needed.

**Stage 2:** Whistle Blower is informed of the outcome of the initial assessment.

**Stage 3:** If an investigation is required, the reporter may be required to attend additional meetings in order to provide further information.

Stage 4: When required, Affidea may appoint an investigator or team of investigators (which may include other appropriate Affidea Personnel with relevant experience of investigations or specialist knowledge of the subject matter). The investigation team keeps Whistle Blowers informed of the progress of any investigation and its likely timescale.

Stage 5: The investigator(s) may make recommendations for change to enable the Affidea Group to minimise the risk of future wrongdoing.

## Where applicable, policies with respect to animal welfare are in place

Although there is no dedicated policy related to animal welfare, it is Affidea's commitment to conduct business in compliance with the applicable law and widely accepted norms of fairness and human decency, and we require our suppliers to act similarly. No animals are harmed directly or indirectly due to our business operations.

## Information about policy for training within organisation on business conduct

Affidea policies define the values, standards and rules by which our compliance program works. Cognito is our Compliance Training Program, which is designed to provide all Affidea staff with clear understanding of their tasks and responsibilities related to the compliance training program of the Affidea Group.

We have a dedicated policy on Cognito training platform, through which Affidea periodically launches training campaigns, aiming to equip all staff working at Affidea with the knowledge necessary for maintaining best-practice within the boundaries of proper ethics and legal compliance.

There are both group and local awareness-raising trainings and campaigns in Cognito platform. Each year we organise global compliance campaigns in Cognito platform (at least 4x per year). Once per year our employees and contractors are also asked to fill in code of conduct compliance certification.

## Disclosure of the functions that are most at risk in respect of corruption and bribery

The employees that are considered at most risk of non-compliance with statutory regulations, and internal compliance procedures, including corruption and bribery are:

- senior leadership team members (group & country level);
- staff working in HR (recruitment) functions;
- staff working in sales / business development positions;
- staff working in procurement/contracting roles;
- staff managing or administering key IT systems.
- staff working in selected finance roles (e.g. invoice processing, bank account management / treasury etc.).

All of these employees are required to complete bi-annual code of conduct / compliance trainings, and declare their compliance via annual compliance certificate.

### Entity is subject to legal requirements with regard to protection of whistleblowers

Yes, relevant legal requirements both at European Union and countries level are respected.

### Description of key contents of policy

These are disclosed in climate change disclosures.

### Description of scope of policy or of its exclusions

These are disclosed in climate change disclosures.

### Description of most senior level in organisation that is accountable for implementation of policy

These are disclosed in climate change disclosures.

### Disclosure of third-party standards or initiatives that are respected through implementation of policy

These are disclosed in climate change disclosures.

### Description of consideration given to interests of key stakeholders in setting policy

These are disclosed in climate change disclosures.

### Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

These are disclosed in climate change disclosures.

## 7.4.1.5.3 Management of relationships with suppliers

### Does the undertaking provide information about the management of its relationships with its suppliers and its impacts (social and environmental) on its supply chain and associated supply chain risks

Affidea has global procurement policy for large equipment. We only buy high quality, certified equipment, from large companies (e.g. GE, Siemens, Philips) that pay equal, if not higher attention to ESG matters. The equipment procured through these suppliers provide reliable diagnostic images or other type of health analysis, thereby creating a positive impact on the patients, own workforce, and referring doctors.

Affidea has local / country level procurement procedures for purchasing medical materials and services. These medical materials or services, although of high quality and highly reliable, are mostly bought from local / country suppliers, thereby creating opportunities, jobs and overall a positive impact on local communities.

The payment terms for suppliers is in accordance with globally acceptable payment terms and contractually agreed periods with the suppliers. This can create a positive impact on the suppliers and among all upstream actors/in the entire supply chain as reduces the risk of chain of debt.

Risks related to supply chain:
If not properly planned, there is a risk of limited or no availability of high quality medical equipment and spare parts - resulting in hindered revenue-generating capability (can be either due to poor management of supplier relations or to global supply chain issues).

There is also a risk of limited or no availability of high quality medical materials (including contrast material and radioactive substances needed to perform examinations) - resulting in hindered revenue-generating capability (can be either due to poor management of supplier relations or to global supply chain issues).

Risk of supply chain issues in case suppliers not treating their workforce employees fairly, or not complying with all applicable human rights, corporate governance and other regulations resulting in operational disruptions and financial difficulties, and not being able to supply Affidea.

Risk of chain of debt in the supply chain if the payment terms for suppliers are not in accordance with locally acceptable payment terms and with the contractually agreed period with the supplier.

## Description of policy to prevent late payments, especially to SMEs

Affidea Procurement policy requires Affidea personnel to deal with suppliers professionally, ethically and fairly. This is also applicable when dealing with SMEs.

Code of Conduct obliges all employees and contractors to conduct business in compliance with the law and widely accepted norms of fairness and human decency, and we require our suppliers to act similarly.

## Description of approaches in regard to relationships with suppliers, taking account risks related to supply chain and impacts on sustainability matters

It is Affidea's policy to conduct business in compliance with the law and widely accepted norms of fairness and human decency, and we require our suppliers to act similarly. As a condition of doing business with Affidea, we expect suppliers to conform to these requirements and expect their sources in the supply chain to do so as well. We assess conformity to these requirements and consider a supplier's progress in meeting these requirements and their ongoing performance in making sourcing decisions.

We run due diligence process during business partner or vendor selection, to assess any potential concerns or risks related to supply chain or the vendor itself, and address them in consultation with the purchasing department. Affidea's Business Partners Selection Process document states that: Affidea seeks to collaborate with Business Partners who:

- Comply with all applicable laws and regulations where they conduct business;
- Do not engage in bribery of any kind;
- Do not engage in illegal activities or operations of any kind;
- Maintain responsible Environment, Health and Safety policies and practices;
- Do not engage in unlawful discrimination or harassment or allow unlawful discrimination or harassment in the workplace;
- Demonstrate a commitment to universally recognized human rights and freedoms and who do not employ children, bonded or illegal immigrant labor as defined by the International Labor Organization (ILO), or use mental or physical coercion.

## Disclosure of how social and environmental criteria are taken into account for selection of supply-side contractual partners

Our code of conduct describes what is expected from our staff, and potential business partners, and despite not being heavily exposed to manufacturing or supply chain industry risks, we have specific policies on supplier selection & due diligence, through which all our suppliers are assessed on their commitment to human rights adherence, health, safety & environment laws etc. Our main equipment suppliers are large publicly listed firms, who have very established duty of care procedures themselves.

In 2024, Affidea developed and implemented ESG principles, including an ESG considerations framework for new capex / opex spend, that requires any large purchases above management threshold must be assessed in line with the ESG principles, including specific environmental criteria.

Further, Affidea's Business Partners Selection Process document states that: Affidea seeks to collaborate with Business Partners who:

- Comply with all applicable laws and regulations where they conduct business;
- Do not engage in bribery of any kind;
- Do not engage in illegal activities or operations of any kind;
- Maintain responsible Environment, Health and Safety policies and practices;
- Do not engage in unlawful discrimination or harassment or allow unlawful discrimination or harassment in the workplace;
- Demonstrate a commitment to universally recognized human rights and freedoms and who do not employ children, bonded or illegal immigrant labor as defined by the International Labor Organization (ILO), or use mental or physical coercion.

## Does it provide a description of the undertaking's practices implemented to support vulnerable suppliers and improve their social and environmental performance?

Affidea's ESG principles in general require a fair treatment of all involved stakeholders, there is a specific text in the capex / opex spend related ESG considerations framework that where applicable, small/vulnerable suppliers are selected and paid in time, to extend our support to them.

## 7.4.1.5.4 Prevention and detection of corruption and bribery

### Information about procedures in place to prevent, detect, and address allegations or incidents of corruption or bribery

The organization has issued proper compliance policies: Code of Conduct, Anti-Bribery, Business Party Selection, Conflict of Interests, Gifts and Hospitality, Whistle Blowing. They include proper definitions of offences and give practical illustrations as well as indicate red flags. The policies contain provisions regarding gifts and hospitality, conflicts of interest, facilitation payments. Countries implement as well local policies on travel expenditures.
Sponsorship agreements and charitable contributions, if any, are under strict monitoring in accordance with Delegation of Authority.

### Investigators or investigating committee are separate from chain of management involved in prevention and detection of corruption or bribery

Yes, investigations if any, are mainly led by General Counsel, who is independent of chain of management, with support of external counsels and experts when needed.

### Information about process to report outcomes to administrative, management and supervisory bodies

The supervisory board has a dedicated Audit, Risk & Compliance (ARC) committee, comprising the selected members of the supervisory board, General Counsel and the Director of Risk & Assurance are permanent invitees. The committee reviews any business concerns, risks or audit findings periodically.

General Counsel regularly gives a reports to the top management on compliance matters (board meetings) and has access to operational data and information from all functions of the company. General Counsel is a main contact for any compliance related questions, and is in charge of ethicsline. Employees are instructed to contact General Counsel in case of any compliance related questions.

### Disclosure of plans to adopt procedures to prevent, detect, and address allegations or incidents of corruption or bribery in case of no procedure

Whistle-Blowing policy already in place with the purpose:

a) To encourage Affidea Personnel to report actual or suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
b) To provide Affidea Personnel with guidance as to how to raise those concerns.
c) To reassure Affidea Personnel that they should be able to raise genuine concerns in good faith (even if they turn out to be mistaken) without fear of reprisals.

### Information about how policies are communicated to those for whom they are relevant (prevention and detection of corruption or bribery)

All policies and procedures are available for each employee and contracted staff in a SharePoint based document management system (ADMS). Relevant training on these policies is part of onboarding process. Every year at least 4 compliance trainings dedicated to various policies and procedures.

The message to promote compliance policies is also communicated on our platform for compliance trainings called Cognito. The message is regularly reaffirmed during global compliance campaigns. Each year we ask our personnel to provide certification of compliance which is demanded by Code of Conduct. The importance of Compliance is also affirmed in our Code of Conduct, which is part of the on-boarding program.

### Information about nature, scope and depth of anti-corruption or anti-bribery training programs offered or required

Training program on anti-corruption and anti-bribery consists of: 1) Cognito training including video materials, interactive exercises, examples and knowledge test, 2) Certification of Compliance in which employees are requested to confirm compliance or report non-compliance with Affidea Anti-Bribery policy.

### Percentage of functions-at-risk covered by training programs

100%

### Information about members of administrative, supervisory and management bodies relating to anti-corruption or anti-bribery training

Affidea's administrative, management and supervisory bodies are committed to business conduct policies applicable to Affidea Group and their promotion among employees and contractors.

Members of administrative, supervisory and management bodies are also enrolled in Cognito platform and requested to run relevant trainings, they also promote importance of Cognito trainings among all employees.

### Disclosure of an analysis of its training activities by, for example, region of training or category

This is voluntary (may disclose), hence no specific analysis is performed this year. In general, all trainings apply to all regions, and there are no differences.

| Results of Affidea's annual online "Code of Conduct certification" training - February 2024 | | | | | |
|---|---|---|---|---|---|
| Countries | Total users who completed the training | Incomplete Users | Total number of Users invited for training | Overall completion ratio | Top management completion rate |
| Bosnia Herzegovina | 34 | 2 | 36 | 94% | 100% |
| Corporate HQ | 82 | 14 | 96 | 85% | 100% |
| Croatia | 64 | 39 | 103 | 62% | 100% |
| Czech Republic | 120 | 11 | 131 | 92% | 100% |
| Greece | 438 | 123 | 561 | 78% | 100% |
| Hungary | 303 | 147 | 450 | 67% | 100% |
| Ireland | 305 | 81 | 386 | 79% | 100% |
| Italy | 744 | 48 | 792 | 94% | 100% |
| Lithuania | 364 | 90 | 454 | 80% | 100% |
| Poland | 823 | 67 | 890 | 92% | 100% |
| Portugal | 719 | 109 | 828 | 87% | 100% |
| Romania | 315 | 279 | 594 | 53% | 100% |
| Spain | 384 | 32 | 416 | 92% | 100% |
| Switzerland | 171 | 21 | 192 | 89% | 100% |
| Turkey | 270 | 204 | 474 | 57% | 100% |
| UK | 76 | 42 | 118 | 64% | 100% |
| **Grand Total** | **5,212** | **1,309** | **6,521** | **80%** | **100%** |

## 7.4.1.5.5 Incidents of corruption or bribery

### Does the undertaking disclose information on reported bribery or corruption incidents during the reporting period

Yes, any incidents will be disclosed in the quantitative data.

### Number of convictions for violation of anti-corruption laws

None

### Number of convictions for violation of anti-bribery laws

None

### Amount of fines for violation of anti-corruption laws

None

### Amount of fines for violation of anti-bribery laws

None

## Any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery

There were no such incidents reported until the writing of this narrative, hence no actions were necessary. However, Affidea has a global anti-bribery policy, that states that: *Any violation of the anti-bribery policy will be treated extremely seriously and may result in disciplinary action up to and including termination of employment and/or termination of contract. Affidea Personnel may also be liable to criminal prosecution. Any person who knows or suspects a potential violation of this Policy should immediately report it to the General Counsel and/or their Responsible Manager.*

In case of allegations of any violation of code of conduct or anti-bribery policy, the management board will be notified and an investigation will be conducted internally or through an external party within a reasonable timeframe. If the allegations are found true then the involved parties will be subject to disciplinary action, as per internal policy or local legislation.

## Number of confirmed incidents of corruption or bribery

None

## Information about nature of confirmed incidents of corruption or bribery

There were no such incidents reported until the writing of this narrative.

## Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents

None

## Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery

None

## Information about details of public legal cases regarding corruption or bribery brought against undertaking and own workers and about outcomes of such cases

There were no such incidents reported until the writing of this narrative.

## Disclose incidents involving actors in its value chain only where the undertaking or its employees are directly involved

There were no such incidents reported until the writing of this narrative.

## Disclosure of key action

Periodic patient satisfaction survey, and timely addressing any complaints received from patients.

## Description of scope of key action

All patients visiting Affidea clinics.

## Time horizon under which key action is to be completed

One month after a complaint is received.

### Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

When a complaint is received it is analysed by the quality function, medical team and administrative staff, and results are communicated back to the patient.

### Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

2024 is the first year.

### Disclosure of the type of current and future financial and other resources allocated to the action plan

No specific resources, budget for addressing patient complaints is managed within the country / clinic general budget.

### Current financial resources allocated to action plan (Capex)

No specific resources, budget for addressing patient complaints is managed within the country / clinic general budget.

### Current financial resources allocated to action plan (Opex)

No specific resources, budget for addressing patient complaints is managed within the country / clinic general budget.

### Future financial resources allocated to action plan (Capex)

No specific resources, budget for addressing patient complaints is managed within the country / clinic general budget.

### Future financial resources allocated to action plan (Opex)

No specific resources, budget for addressing patient complaints is managed within the country / clinic general budget.

## 7.4.1.5.6 Lobbying practices

### Does the undertaking disclose information on the activities and commitments related to exerting its political influence, including its lobbying activities related to its material impacts, risks and opportunities

Affidea does not engage in any lobbying or political activities. The Gift and Hospitality policy strictly regulates this matter.

### Information about representative(s) responsible in administrative, management and supervisory bodies for oversight of political influence and lobbying activities

Affidea does not engage in any lobbying or political activities. The Gift and Hospitality policy strictly regulates this matter.

### Information about financial or in-kind political contributions

Affidea does not engage in any lobbying or political activities. No financial or in-kind political contributions.

### Disclosure of how monetary value of in-kind contributions is estimated

Affidea does not engage in any lobbying or political activities. No financial or in-kind political contributions.

### Disclosure of main topics covered by lobbying activities and undertaking's main positions on these topics

Affidea does not engage in any lobbying or political activities. No financial or in-kind political contributions.

### Undertaking is registered in EU Transparency Register or in equivalent transparency register in Member State, the name of any such register and its identification number in the register

No Affidea is not registered in EU transparency register. Affidea does not engage in any lobbying or political activities. No financial or in-kind political contributions.

### The entity is legally obliged to be a member of a chamber of commerce or other organisation that represents its interests

Yes, in each country of operation, all legal entities that operate Affidea clinics are registered in relevant chamber of commerce register.

### Information about appointment of any members of administrative, management and supervisory bodies who held comparable position in public administration (including regulators) in two years preceding such appointment in the current reporting period

No such appointments.

## 7.4.1.5.7 Payment practices

### Does the undertaking disclose information on its payment practices, especially with respect to legal proceedings for late payments?

Affidea's standard payment terms are payment on receipt of invoice for medical materials, which is generally within 30 days. For larger purchases for global / large suppliers, payments are between 45-60 days.

### Average number of days to pay invoice from date when contractual or statutory term of payment starts to be calculated

71.25

### Description of undertakings standard payment terms in number of days by main category of suppliers

Large global suppliers: 45-60 days. Contrast media is 90 days.

Small local suppliers: up to 30 days.

### Percentage of payments aligned with standard payment terms

Data not available in detail for 2024, will be compiled in 2025.

### Number of outstanding legal proceedings for late payments

None

### Disclosure of contextual information regarding payment practices

Affidea has global procurement policy for large equipment, such as MRI machine, CT scanners. We only buy high quality, certified equipment, from large companies (e.g. GE, Siemens, Philips) that pay equal, if not higher attention to ESG matters. The payment terms for such global suppliers is in accordance with globally acceptable payment terms.

Affidea has local / country level procurement procedures for purchasing medical materials and services (e.g. general medicines, gloves, personal protection equipment). These medical materials or services, although of high quality and highly reliable, are mostly bought from local / country suppliers, thereby creating opportunities, jobs and overall a positive impact on local communities. The payment terms for such local suppliers is in accordance with contractually agreed periods with the suppliers or on receipt of invoice.

## 7.4.2 Appendix II - Sanoptis

### 7.4.2.1 General Information

#### 7.4.2.1.1 Reporting scope and boundaries

**Basis for preparation of sustainability statement (consolidated or individual basis)**

This sustainability statement is prepared in accordance with the European Sustainability Reporting Standards (ESRS) issued by the European Financial Reporting Advisory Group (EFRAG).

**Scope of consolidation of consolidated sustainability statement is same as for financial statements**

Sanoptis S.à.r.l is a fully consolidated subsidiary of Groupe Bruxelles Lambert SA. The scope of consolidation of this sustainability statement is the same as for financial statements.

**Disclosure of extent to which sustainability statement covers upstream and downstream value chain**

Unless otherwise specified, this sustainability statement covers Sanoptis' entire upstream and downstream value chain.

**Option to omit specific piece of information corresponding to intellectual property, know-how or results of innovation has been used**

**In social information:** Consumer and end-users, Action 2, "Enhancing Patient Care and Wellbeing through Targeted Investments," Sanoptis highlights its investment in "RetinAI", supported by a substantial allocation of OPEX/CAPEX to advance this initiative. Due to confidentiality, specific Euro amounts invested remain undisclosed.

#### 7.4.2.1.2 Specific circumstances related to time horizons

**Disclosure of definitions of medium- or long-term time horizons**

In accordance with ESRS 1, §77, the short-term time horizon is defined as up to a 12-month period.

In accordance with ESRS 1, §77, the medium-term time horizon is defined as the period ranging from the end of the short-term reporting period defined above up to 5 years.

In accordance with ESRS 1, §77, the long-term time horizon is defined as any period beyond 5 years.

**Disclosure of reasons for applying different definitions of time horizons**

Not applicable, as the time horizons have been applied in accordance with the ESRS

#### 7.4.2.1.3 Value chain estimation

**Disclosure of metrics that include value chain data estimated using indirect sources**

Not applicable, as no such metrics will be disclosed.

**Description of basis for preparation of metrics that include value chain data estimated using indirect sources**

Not applicable, as no such metrics will be disclosed.

**Description of resulting level of accuracy of metrics that include value chain data estimated using indirect sources**

Not applicable, as no such metrics will be disclosed.

### Description of planned actions to improve accuracy in future of metrics that include value chain data estimated using indirect sources

Not applicable, as no such metrics will be disclosed.

## 7.4.2.1.4 Sources of estimation and outcome uncertainty

### Disclosure of quantitative metrics and monetary amounts disclosed that are subject to high level of measurement uncertainty

Not applicable, as no such metrics will be disclosed.

### Disclosure of sources of measurement uncertainty

Not applicable, as no such metrics will be disclosed.

### Disclosure of assumptions, approximations and judgements made in measurement

Not applicable, as no such metrics will be disclosed.

## 7.4.2.1.5 Changes in preparation or presentation of sustainability information

### Explanation of changes in preparation and presentation of sustainability information and reasons for them

Not applicable, as this is Sanoptis' first sustainability statement, with no prior changes in the preparation or presentation of sustainability information to disclose.

### Disclosure of revised comparative figures

Not applicable, as this is Sanoptis' first sustainability statement, with no prior changes in the preparation or presentation of sustainability information to disclose.

### Disclosure of difference between figures disclosed in preceding period and revised comparative figures

Not applicable, as this is Sanoptis' first sustainability statement, with no prior changes in the preparation or presentation of sustainability information to disclose.

## 7.4.2.1.6 Reporting errors in prior periods

### Disclosure of nature of prior period material errors

Not applicable, as this is Sanoptis' first sustainability statement, with no material errors from a prior period to disclose.

### Disclosure of corrections for prior periods included in sustainability statement

Not applicable, as this is Sanoptis' first sustainability statement, with no material errors from a prior period to disclose.

### Disclosure of why correction of prior period errors is not practicable

Not applicable, as this is Sanoptis' first sustainability statement, with no material errors from a prior period to disclose.

## 7.4.2.1.7 Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

### Disclosure of other legislation or generally accepted sustainability reporting standards and frameworks based on which information has been included in sustainability statement

Not applicable, as no such information will be disclosed.

### Disclosure of reference to paragraphs of standard or framework applied

Not applicable, as no such information will be disclosed.

## 7.4.2.1.8 Incorporation by reference

### List of disclosure requirements (DRs) or datapoints (DPs) mandated by a Disclosure Requirement that have been incorporated by reference

Not applicable, as no such information is incorporated by reference.

## 7.4.2.1.9 Use of phase-in provisions

### Topics (E4, S1, S2, S3, S4) have been assessed to be material

Sanoptis does not apply the phase-in provisions, rendering this disclosure not applicable.

### List of sustainability matters assessed to be material (phase-in)

Sanoptis does not apply the phase-in provisions, rendering this disclosure not applicable.

### Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)

Sanoptis does not apply the phase-in provisions, rendering this disclosure not applicable.

### Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets

Sanoptis does not apply the phase-in provisions, rendering this disclosure not applicable.

### Description of policies related to sustainability matters assessed to be material (phase-in)

Sanoptis does not apply the phase-in provisions, rendering this disclosure not applicable.

### Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions

Sanoptis does not apply the phase-in provisions, rendering this disclosure not applicable.

### Disclosure of metrics related to sustainability matters assessed to be material (phase-in)

Sanoptis does not apply the phase-in provisions, rendering this disclosure not applicable.

## 7.4.2.1.10 Governance structure and composition

### Information about representation of employees and other workers

As of 31 December 2024, none of the bodies included employee or other worker representatives.

### Information about member's experience relevant to sectors, products and geographic locations of undertaking

Sanoptis' management team consists of five professionals with expertise in the European healthcare sector. The Board of Directors includes the Chief Executive Officer, who brings 25 years of experience in European healthcare, three representatives from the majority shareholder, Groupe Bruxelles Lambert SA, with a background in European investment management, and an independent member with experience in both the pharmaceutical and healthcare industries.

### Board diversity, by gender

| Gender | Number of board members | Percentage of the board |
|---|---|---|
| Women | 0 | 0.00 |
| Men | 5 | 100.00 |

### Board independence ratio

| Type of board member | Number | Percentage |
|---|---|---|
| Independent | 1 | 20.00 |
| Executive | 1 | 20.00 |
| Non-Executive | 3 | 60.00 |

## 7.4.2.1.11 Roles and responsibilities of administrative, management and supervisory bodies

### Information about identity of administrative, management and supervisory bodies or individual(s) within a body responsible for oversight of impacts, risks and opportunities

Each local Commercial Director of Sanoptis' Network partners (e.g., majority-owned subsidiaries of Sanoptis) is responsible for material impacts related to S1 – Own Workforce and S4 – Patient Safety at the clinics or practices they oversee. ES1 - Doctor succession is overseen by the Group Chief Executive Officer, in collaboration with the Group Chief of Staff. The Board of Directors is ultimately responsible for overseeing the company's overall governance, strategic direction, and ensuring that all material risks and opportunities, including those related to sustainability and ESG, are effectively managed.

### Disclosure on how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies

The Board of Directors is responsible for overseeing the company's strategy, including the identification, management, and monitoring of impacts, risks, and opportunities. Responsibility for ESG matters has been delegated to the Chief Services Officer, who oversees these at the senior management level.

### Description of how oversight is exercised over management-level position or committee to which management's role is delegated to

The Group Chief Executive Officer exercises oversight of the Group Chief Services Officer, who is responsible for all ESG-related topics at the senior management level. The Board of Directors receives updates on these developments during Business Update and Board meetings, held typically eight times per year.

Doctor succession (an entity-specific topic) is overseen directly by the Group Chief Executive Officer in collaboration with the Group Chief of Staff.

In line with Sanoptis' decentralized business model, each local Commercial Director oversees material impacts related to S1 – Own Workforce and S4 – Patient Safety for the clinics and practices they oversee, reporting to the respective Country Head. The Country Heads of Sanoptis' key markets, Germany and Switzerland, report to the Group Chief Operating Officer, while the Country Heads of Italy, Spain, Austria and Greece report directly to the Group Chief Executive Officer.

### Information about reporting lines to administrative, management and supervisory bodies

Sanoptis' administrative body overseeing ESG topics holds weekly meetings with the Group Chief Services Officer, who, in turn, meets one-on-one with the Group Chief Executive Officer on a weekly basis. The Board of Directors is updated quarterly or on an ad-hoc basis when necessary. Additionally, the management team receives at least one formal update per year on ESG matters. The administrative body holds bi-weekly meetings with the ESG team of Sanoptis' majority shareholder, Groupe Bruxelles Lambert SA, with updates and meeting minutes shared with the Board of Directors when deemed necessary.

### Disclosure of how dedicated controls and procedures are integrated with other internal functions

Sanoptis conducted its first Double Materiality Assessment in 2024, marking an important step toward aligning ESG practices with its operations. Sanoptis aims to integrate dedicated controls and procedures with other internal functions in the years to come.

### Disclosure of how administrative, management and supervisory bodies and senior executive management oversee setting of targets related to material impacts, risks and opportunities and how progress towards them is monitored

Sanoptis has not yet formally adopted targets relating to material impacts, risks and opportunities. Any potential future targets will be proposed, discussed, and ultimately approved by the Executive Team and the Board of Directors.

## 7.4.2.1.12 Skills and expertise to oversee sustainability matters

### Disclosure of how administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee sustainability matters

Annual performance reviews are conducted for the administrative and management body overseeing ESG matters. The Board of Directors (supervisory body) monitors the performance and progress related to sustainability matters.

### Information about sustainability-related expertise that bodies either directly possess or can leverage

The administrative, management, and supervisory bodies draw upon a broad range of insights and resources to address sustainability-related topics effectively. These include internal expertise, such as the People Team's guidance on material impacts outlined in social information: own workforce and the Operations Team, including local Commercial Directors, who provide operational depth for social information: consumer and end-users. The Board of Directors, comprising seasoned professionals with experience in non-financial reporting, offers strategic oversight. Furthermore, in-house expertise is being continuously developed to strengthen internal capabilities. When necessary, Sanoptis also engages external experts across various domains, including sustainability and ESG, to ensure access to specialized knowledge.

### Disclosure of how sustainability-related skills and expertise relate to material impacts, risks and opportunities

**See Information about sustainability-related expertise that bodies either directly possess or can leverage**

### Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them

Sanoptis' Board of Directors and Senior Management team receives updates on sustainability matters on an ad-hoc basis or when developments render such communication necessary or beneficial; however, at least once a year. These updates are delivered by the Group Chief Services Officer.

The administrative body has so far not been updated on sustainability matters.

In accordance with the German Supply Chain Act, the Board of Directors is briefed on supplier risk assessments if significant supply chain risks are identified. In 2024, no such risks were identified, and therefore, no updates were provided.

### Disclosure of how administrative, management and supervisory bodies consider impacts, risks and opportunities when overseeing strategy, decisions on major transactions and risk management process

**See Disclosure on how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies**

### Disclosure of list of material impacts, risks and opportunities addressed by administrative, management and supervisory bodies or their relevant committees

**See Information about identity of administrative, management and supervisory bodies or individual(s) within a body responsible for oversight of impacts, risks and opportunities**

## 7.4.2.1.13 Integration of sustainability-related performance in incentive schemes

### Description of key characteristics of incentive schemes

Not applicable, as no sustainability-related performance is currently integrated into incentive schemes.

### Description of specific sustainability-related targets and (or) impacts used to assess performance of members of administrative, management and supervisory bodies

No such targets are currently used to assess the performance of administrative, management and supervisory bodies.

### Disclosure of how sustainability-related performance metrics are considered as performance benchmarks or included in remuneration policies

No such targets are currently considered in remuneration policies.

### Percentage of variable remuneration dependent on sustainability-related targets and (or) impacts

0.00 %

### Description of level in undertaking at which terms of incentive schemes are approved and updated

Not applicable, as no sustainability-related performance is currently integrated into incentive schemes.

## 7.4.2.1.14 Risk management and internal controls over sustainability reporting

### Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting

Risks associated with internal control processes for sustainability reporting may arise due to the decentralized structure of Sanoptis, where a strict avoidance of a top-down corporate culture supports autonomy across the individual Network Partners. This approach means that providing comprehensive statements covering the entire Sanoptis Network requires careful consideration, focusing on providing only information applicable to all Network Partners.

Additionally, the high level of detail and specificity required by the European Sustainability Reporting Standards (ESRS) presents challenges, particularly in aligning data collection and reporting processes across a decentralized Network. As a private entity with limited experience in non-financial reporting, Sanoptis is addressing these new requirements by leveraging internal expertise, engaging external consultants to provide specialized guidance, and further strengthening collaboration across its Network.

Sanoptis is among the first cohort of businesses required to report under the CSRD. The lack of established benchmarks or CSRD-compliant reports to serve as guidance adds an additional layer of complexity to the reporting process.

Key risks and mitigation measures identified by Sanoptis:

a) **Decentralized Network structure:** To address the nuances of a decentralized setup, mitigation efforts include strengthening collaboration with Network Partners, aligning processes, and ensuring the active involvement of local management teams.
b) **Timely information delivery:** To ensure timely reporting, the ESG department provides continuous support for data collection and raises awareness among stakeholders about the importance of meeting reporting timelines.

### Description of risk assessment approach followed

**See Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting**

### Description of main risks identified and their mitigation strategies

**See Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting**

### Description of how findings of risk assessment and internal controls as regards sustainability reporting process have been integrated into relevant internal functions and processes

**See Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting**

### Description of periodic reporting of findings of risk assessment and internal controls to administrative, management and supervisory bodies

**See Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting**

## 7.4.2.1.15 Operating sector

### List of ESRS sectors that are significant for undertaking

At the time of writing this sustainability statement, no sector-specific European Sustainability Reporting Standards (ESRS) have been published. Therefore, sector-specific standards are currently not applicable.

### Undertaking is active in fossil fuel (coal, oil and gas) sector

No

### Undertaking is active in chemicals production

No

### Undertaking is active in controversial weapons

No

### Undertaking is active in cultivation and production of tobacco

No

## 7.4.2.1.16 About the company's activities

### Description of business model and value chain

Sanoptis is a European leader in ophthalmology services, with a network of over 400 ophthalmological practices and clinics across Germany, Switzerland, Austria, Italy, Greece, and Spain. Sanoptis' mission is clear: first-class ophthalmology for everyone – collaboratively within a strong network. Sanoptis is dedicated to enhancing the quality of life and visual performance of patients. This is achieved by equipping doctors with advanced technology, fostering their professional development, and encouraging close collaboration within the Network. Through majority participation, Sanoptis partners with entrepreneurial ophthalmologists to drive growth within their region of operation.

Federalism and operational independence are central to Sanoptis' business model. Sanoptis focuses its influence solely on areas where real value can be added, empowering Network Partners to maintain their operational autonomy while leveraging the resources, expertise, and economies of scale of a larger organization. This partnership of equals places patients firmly at the center of every activity.

**Value chain: See Description of main features of upstream and downstream value chain and undertakings position in value chain**

### Description of inputs and approach to gathering, developing and securing inputs

Sanoptis' Network Partners source medical equipment, diagnostic machinery, pharmaceuticals, medical consumables, and intellectual services. Network Partners independently gather inputs based on their specific needs. Framework agreements with OEMs are in place for certain equipment (machinery and lenses) to ensure access to high-quality products at competitive rates.

### Description of significant groups of products and (or) services offered

- **Consultations:** Expert consultations for diagnosing and managing a variety of eye conditions.
- **Cataract surgeries:** Advanced procedures to restore vision impaired by cataracts (grey star).
- **Glaucoma surgeries:** Specialized surgical interventions aimed at controlling glaucoma and preserving vision.
- **Refractive surgeries:** Procedures such as SMILE, aimed at correcting vision issues like myopia, hyperopia, and astigmatism.
- **Treatment for age-related macular degeneration (AMD):** Comprehensive care to manage and treat AMD, a leading cause of vision loss in more senior adults.
- **Retinal detachment surgeries:** Surgical solutions to reattach the retina and prevent permanent impairment of the vision.
- **Corneal surgeries:** Procedures to address a range of corneal disorders, from transplants to corrective surgeries, ensuring clear and healthy vision.
- **Strabology services:** Treatment for strabismus (misaligned eyes), providing both surgical and non-surgical solutions for patients of all ages.
- **Medical eyelid surgeries:** Procedures designed to address functional or aesthetic issues of the eyelids, enhancing both vision and appearance.

### Description of significant markets and (or) customer groups served

At the time of publication of this sustainability statement, Sanoptis has partnered with ophthalmologists across Germany, Switzerland, Austria, Greece, Italy, and Spain. Sanoptis' Network Partners welcome all individuals in need of ophthalmological care.

### Description of products and services that are banned in certain markets

None of the services provided by Sanoptis' Network Partners are banned in any market.

## 7.4.2.1.17 About the value chain

### Description of outputs and outcomes in terms of current and expected benefits for customers, investors and other stakeholders

Sanoptis' patients benefit from improved vision and overall eye health through the care provided by Sanoptis' Network Partners. Access to modern equipment at competitive conditions and the expertise of experienced medical professionals promotes high standards of ophthalmological treatment.

Investors benefit from Sanoptis' stable growth and strong market presence across currently six countries.

### Description of main features of upstream and downstream value chain and undertakings position in value chain

Sanoptis operates within the healthcare value chain as a provider of ophthalmological services.

#### Upstream:

Sanoptis sources medical equipment, diagnostic machinery, pharmaceuticals, intellectual services, and medical consumables. Each surgeon independently selects the equipment they use, as they are ultimately responsible for the patient's wellbeing. Sanoptis' Network Partners are obliged to exclusively use pharmaceuticals that have been approved by the relevant regulatory authorities.

#### Downstream:

Sanoptis' downstream activities include patient aftercare (if conducted outside of the Sanoptis Network), follow-up consultations (if conducted outside of the Sanoptis Network), and waste management, adhering to regulatory standards.

Sanoptis' role in the value chain is to deliver ophthalmological services through a decentralized network of clinics and practices.

## 7.4.2.1.18 Income statement

### Total Revenue/Gross Revenue

665,711,396.00 EUR

## 7.4.2.1.19 Sustainability-related goals

### Description of sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders

Not applicable, as currently no specific sustainability-related goals have been approved by the Board of Directors.

### Disclosure of assessment of current significant products and (or) services, and significant markets and customer groups, in relation to sustainability-related goals

Not applicable, as currently no specific sustainability-related goals have been approved by the Board of Directors.

### Disclosure of elements of strategy that relate to or impact sustainability matters

Sanoptis' strategy is centered on delivering high-quality eye care by leveraging advanced technology and personalized treatment, provided through locally managed teams. Medical personnel benefit from predictable working hours, modern equipment, and a secure working environment. By combining operational independence with shared resources, Sanoptis aims to contribute to a sustainable business model that considers the needs of both patients (ESRS S4) and employees (ESRS S1 and ES1).

## 7.4.2.1.20 Interests and views of stakeholders

### Description of key stakeholders

Sanoptis' key stakeholders include patients, Network Partners, employees, suppliers, and investors. Patients rely on Sanoptis for high-quality ophthalmological care. Network Partners provide medical services within the decentralized network. Employees contribute to the delivery of healthcare services. Suppliers provide medical equipment, consumables, and pharmaceuticals while investors support Sanoptis' growth and market presence.

### Description of categories of stakeholders for which engagement occurs

**Patients:** Engagement occurs in person throughout the care process, allowing for direct feedback.

Engagement with Network Partners is maintained through regular collaboration with local Commercial Directors, supplemented by ad-hoc interactions as needed. An annual in-person meeting is held at the Sanoptis Medical Board, bringing together leading doctors from all Sanoptis Network Partners.

**Employees:** Engagement takes place directly at the Network Partner level through open communication channels. Meetings can be scheduled on an ad-hoc basis at employees' request. Employee engagement across the Sanoptis Network is tailored to each Network Partner, with individual approaches rather than a standardized, universal process.

**Investors:** Board- and business update meetings are held typically eight times a year, supplemented by bi-weekly calls and ad-hoc meetings.

**Suppliers:** Engagement with suppliers commonly occurs during congresses, such as DOG and ESCRS, as well as during contract renewal discussions or when other collaboration opportunities arise.

### Description of how stakeholder engagement is organised

**See Description of categories of stakeholders for which engagement occurs**

### Description of purpose of stakeholder engagement

The purpose of stakeholder engagement is to encourage open communication, address specific needs or concerns, and help ensure alignment across all parties involved. Engagement focuses on transparency, informed decision-making, and collaboration to enhance outcomes, whether for patients, employees, Network Partners, investors, or suppliers.

### Description of how outcome of stakeholder engagement is taken into account

The outcomes of stakeholder engagement are shared with relevant parties, including those responsible or directly interested, ensuring integration into decision-making and operational improvements.

### Description of understanding of interests and views of key stakeholders as they relate to undertaking's strategy and business model

Patients prioritize high-quality care, transparency, safety, and access to treatment. Sanoptis' decentralized structure allows network partners to adapt to the specific needs of their local patient base. Identifying the relevance of S4 consumers and end-users to patient care was a clear process, and stakeholder interviews further validated this assessment.

Network Partners value professional independence, access to a network of peers, modern equipment at competitive conditions to further enhance patient care, opportunities for continued professional development, and access to capital to support the growth and expansion of their clinics or practices.

Employees value stability and predictability. Sanoptis and its Network Partners seek to provide secure employment with structured working hours. Interviews with stakeholders representing employees were conducted, and their feedback was incorporated into Sanoptis' Double Materiality Assessment.

Investors prioritize financial stability and long-term growth. Interviews with investors were conducted, and their feedback was incorporated into Sanoptis' double materiality assessment.

### Description of how strategy and (or) business model have been amended or are expected to be amended to address interests and views of stakeholders

Sanoptis currently does not deem any adjustments to the business model necessary.

### Description of any further steps that are being planned and in what timeline

Sanoptis will prioritize enhancing its sustainability-related disclosures in the coming years, with a focus on quantitative data. Specific steps will be defined and implemented within appropriate timelines to improve alignment with regulatory requirements and reporting standards.

### Further steps that are being planned are likely to modify relationship with and views of stakeholders

Sanoptis currently does not expect future actions to modify its relationship with stakeholders.

### Description of how administrative, management and supervisory bodies are informed about views and interests of affected stakeholders with regard to sustainability-related impacts

**See Description of key stakeholders and Further steps that are being planned are likely to modify relationship with and views of stakeholders**

## 7.4.2.1.21 Material impacts, risks and opportunities and their interaction with strategy and business model

### Description of material impacts resulting from materiality assessment

#### S4 Patient Safety (Own Operations)

- **Potential negative impact:** Potential negative impact on patient's health due to unforeseen complications or an unexpected outcome during treatment or surgery.
- **Positive impact:** Sanoptis' Network Partners focus on treating eye conditions and improving vision, which positively contributes to enhancing patients' quality of life.

#### ES1 – Doctor Succession (Own Operations)

**Potential negative impact:** If succession planning and recruitment of doctors are not adequately prioritized, there is a risk that successors may be identified too late or not at all. This could result in a (temporary) reduction in the site's capacity to deliver services. In the absence of adequate numbers of qualified doctors, the affected Network Partner may experience operational disruptions, potentially leading to reduced service availability, longer waiting times, or requiring patients to travel greater distances for the care they need.

#### S1 – Own Workforce (Own Operations)

**Negative impact:** Mental stress or illnesses among employees (e.g., due to workload, time pressure, deadlines)

### Description of material risks and opportunities resulting from materiality assessment

#### ES1 – Doctor succession (Own Operations)

If successors are identified too late or not at all, Network Partners' ability to provide sufficient revenue-generating services may be limited

### Disclosure of current and anticipated effects of material impacts, risks and opportunities on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Currently, no significant impact on business model, value chain, strategy or decision-making is expected.

### Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment

**Environment:** No material impacts have or are likely to affect the environment.

**People:** Impacts and potential impacts on people are thoroughly reported on in the following paragraphs of this sustainability statement.

## Disclosure of how impacts originate from or are connected to strategy and business model

As providers of healthcare services, material impacts identified in ESRS S1 and ESRS S4 originate from the business model.

The entity-specific, potential material impact identified originates from Sanoptis' strategy.

## Disclosure of reasonably expected time horizons of impacts

**ESRS S1:** Medium-term

**ESRS S4:** Long-term

**ES1:** Long-term

## Description of nature of activities or business relationships through which undertaking is involved with material impacts

### S4 – Patient Safety (Own Operations)

Sanoptis' Network Partners provide specialized ophthalmological services. This core activity carries a potential impact on patient safety (S4), as all surgical procedures inherently carry some degree of risk.

### ES1 – Doctor Succession (Own Operations)

Doctor Succession is essential to ensure continuous quality care. Sanoptis collaborates with Network Partners to proactively manage succession, reducing and avoiding potential service disruptions and maintaining patient access to qualified doctors.

### S1 – Own Workforce (Own Operations)

Sanoptis spans over 400 locations, each with its own workforce. Following a decentralized business model, each local Commercial Director is responsible for overseeing workforce well-being, with support from Sanoptis Group's People team for framework agreements and initiatives.

## Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows and material risks and opportunities for which there is significant risk of material adjustment within next annual reporting period to carrying amounts of assets and liabilities reported in related financial statements

Doctor Succession has been identified as a material financial risk for Sanoptis. However, no significant risk of material adjustments to the carrying amounts of assets or liabilities is expected within the next annual reporting period. Likewise, Sanoptis does not anticipate material effects on its financial position, performance, or cash flows related to doctor succession.

## Information about resilience of strategy and business model regarding capacity to address material impacts and risks and to take advantage of material opportunities

Sanoptis maintains streamlined decision-making processes, enabling adaptability and a swift response to emerging impacts, risks and opportunities.

## Disclosure of changes to material impacts, risks and opportunities compared to previous reporting period

Not applicable, as this is Sanoptis' first sustainability statement, with no prior changes in the preparation or presentation of sustainability information to disclose.

## Disclosure of specification of impacts, risks and opportunities that are covered by ESRS Disclosure Requirements as opposed to those covered by additional entity-specific disclosures

Sanoptis addresses S4 – Patient Safety and S1 – Own Workforce in line with ESRS disclosure requirements. Additionally, Doctor Succession (ES1) is disclosed as an entity-specific topic due to its importance in maintaining service continuity. While ESRS standards guide our primary disclosures, this specific focus reflects risks and potential impacts unique to Sanoptis.

## 7.4.2.1.22 Processes to identify and assess material impacts, risks and opportunities

### Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities

#### Identification of Sustainability Landscape

The first phase of the Double Materiality Assessment (DMA) focuses on defining Sanoptis' sustainability landscape and its relevance to core operations, as well as identifying key stakeholders and their roles. This step lays the foundation for determining potential material ESG topics to be assessed in the subsequent phases. Key activities include:

- Mapping business relationships across the value chain, detailing their type and nature.
- Identifying affected stakeholders and understanding their potential interests.
- Analyzing publicly available information from industry peers for benchmarking and insights.

This structured approach ensures a comprehensive understanding of Sanoptis' sustainability context and stakeholder dynamics, setting the stage for effective prioritization of material topics.

#### Stakeholder Engagement

Stakeholder engagement is essential for identifying and defining sustainability topics and related IROs for Sanoptis, applying criteria to assess impacts, financial materiality, and determining material disclosures. This process involved direct engagement with internal stakeholders, while internal proxies were used to incorporate the perspectives of external stakeholders.

Interviews were conducted with internal stakeholders to gather insights directly from those involved in Sanoptis' corporate activities. Internal proxies were engaged to incorporate the views of external stakeholders who may be affected by specific sustainability matters.

These stakeholders were involved throughout several phases, including:

(i) the identification and validation of potential ESG topics and related IROs;

(ii) validation of the assessments and scores during the impact materiality phase; and

(iii) validation of the assessments and scores during the financial materiality phase.

#### Assumptions

Key assumptions include that the perspectives from interviewed stakeholders sufficiently capture the opinions of the broader stakeholder landscape.

#### Monitoring of Impacts, Risks and Opportunities

Sanoptis will monitor its IROs annually and update its double materiality assessment in alignment with the ESRS.

#### Impact Materiality Assessment

In line with CSRD requirements and EFRAG IG 1, all potential material ESG topics and related IROs identified are scored based on the scale (1 'minimal' to 5 'maximal'), scope (1 'limited' to 5 'global'), level of irremediability (0 'easy to remedy' to 5 'irreversible'), and likelihood (0.05 'highly improbable' to 0.95 'highly probable') of the impact.

An aggregated score is then calculated by multiplying the severity (the severity of the impact is determined by adding the scores for scale, scope, and remedy, and then calculating the average) with the likelihood of the impact. Sanoptis retained "Equal to or above 3.5" as the impact materiality threshold.

The assessment of material impacts based on the criteria above is carried out for each impact identified within the sustainability topics:

(i) a scoring is attributed to each criterion: scale, scope, irremediability, and likelihood;

(ii) a calculation is made using the appropriate method; and

(iii) each impact with a score equal to or above 3.5 is considered material and is reported on in this sustainability statement.

### Financial Materiality

In order to identify risks and opportunities within the sustainability topics, the following factors were taken into account:

(i) Impact materiality and financial materiality assessment being interrelated, interdependencies between the two dimensions are initially considered through the identification of the financial effects of the impacts previously identified.

(ii) the analysis of dependencies and the identification of specific business relationships that contribute to additional risks or opportunities is carried out to complete the list. Sanoptis' potential dependency on natural, human, and/or social resources is assessed based on its business processes and specific business relationships; and

(iii) Stakeholder engagement supports the assessment, validation, and completeness of the list of material risks and opportunities, as well as the evaluation of financial effects and likelihood of the topics in line with the ESRS criteria.

In line with CSRD requirements, all potential material ESG topics and related IROs identified are scored by considering the magnitude of the financial effect (1 'insignificant' to 5 'critical') and likelihood (0.05 'highly improbable' to 0.95 'highly probable') of the impact over the defined time horizons. In line with EFRAG IG 1 Materiality Assessment implementation guidance, "Equal to or above 3.5" has been retained as the financial materiality threshold.

The financial materiality assessment based on the criteria detailed above is carried out for each sustainability matter identified:

(i) a scoring is attributed to each criterion (magnitude and likelihood);

(ii) a calculation is made in application of the appropriate calculation method subject to the risk or opportunity qualification; and

(iii) each risk and opportunity with a score equal to or above 3.5 is considered financially material and is reported on in this sustainability statement.

### Material ESG Topics and Related IROs

Based on the lists of ESG topics and related IROs, a consolidated list of material ESG topics and related IROs for Sanoptis has been produced. This list forms the basis for the preparation of the sustainability statement and supports the production of the DMA matrix. The list of material ESG topics, related IROs, and DMA matrix has been validated by Sanoptis' senior management and representatives of Sanoptis' majority shareholders, Groupe Bruxelles Lambert SA.

## Description of process to identify, assess, prioritise and monitor potential and actual impacts on people and environment, informed by due diligence process

**See Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities**

## Description of how process focuses on specific activities, business relationships, geographies or other factors that give rise to heightened risk of adverse impacts

**See Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities**

## Description of how process considers impacts with which undertaking is involved through own operations or as result of business relationships

**See Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities**

## Description of how process includes consultation with affected stakeholders to understand how they may be impacted and with external experts

External stakeholders were not directly involved in the assessment process; instead, their perspectives were represented through internal proxies. Representatives from Sanoptis' largest network partners participated to ensure their realities were accurately reflected in the Double Materiality Assessment (DMA).

### Description of how process prioritises negative impacts based on their relative severity and likelihood and positive impacts based on their relative scale, scope and likelihood and determines which sustainability matters are material for reporting purposes

To integrate the ESRS provision that "Any of the three characteristics (scale, scope, and irremediable character) can make a negative impact severe" (ESRS 1 - 3.4) into impact materiality decisions, Sanoptis conducted a severity analysis. Negative impacts meeting the highest category for one of these characteristics but not exceeding the materiality threshold were separately listed and reviewed to assess if they should be deemed material based on severity alone. To comply with ESRS 1 Paragraph 45, where "the severity of the impact takes precedence over its likelihood" for potential negative human rights impacts, likelihood for such impacts was set to "1," treating them as actual impacts to prioritize severity. Definitions of human rights violations align with the Universal Declaration of Human Rights (UDHR).

### Description of process used to identify, assess, prioritise and monitor risks and opportunities that have or may have financial effects

**See Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities**

### Description of how connections of impacts and dependencies with risks and opportunities that may arise from those impacts and dependencies have been considered

**See Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities**

### Description of how likelihood, magnitude, and nature of effects of identified risks and opportunities have been assessed

**See Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities**

### Description of how sustainability-related risks relative to other types of risks have been prioritised

**See Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities**

### Description of decision-making process and related internal control procedures

**See Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities**

### Description of extent to which and how process to identify, assess and manage impacts and risks is integrated into overall risk management process and used to evaluate overall risk profile and risk management processes

**See Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities**

### Description of extent to which and how process to identify, assess and manage opportunities is integrated into overall management process

No material opportunities relevant to the ESRS framework were identified in 2024, rendering this disclosure not applicable.

### Description of input parameters used in process to identify, assess and manage material impacts, risks and opportunities

**See Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities**

### Description of how process to identify, assess and manage impacts, risks and opportunities has changed compared to prior reporting period

Not applicable, as this is Sanoptis' first sustainability statement, with no prior changes in the preparation or presentation of sustainability information to disclose.

## 7.4.2.1.23 Disclosure Requirements included in the undertaking's sustainability statement and of the topics that have been omitted as not material

### Disclosure of list of data points that derive from other EU legislation and information on their location in sustainability statement

| Disclosure requirement | Data point | Sustainability statement Appendix | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| ESRS 2 GOV-1 | 21 (d) | Board's gender diversity | Indicator number 13 of Table #1 of Annex 1 | | Commission Delegated Regulation (EU) 2020/1816 ( 27 ), Annex II | | material | [7.4.2.1.10] |
| ESRS 2 GOV-1 | 21 (e) | Percentage of board members who are independent | | | Delegated Regulation (EU) 2020/1816, Annex II | | material | [7.4.2.1.10] |
| ESRS 2 GOV-4 | 30 | Statement on due diligence | Indicator number 10<br>Table #3 of Annex 1 | | | | material | |
| ESRS 2 SBM-1 | 40 (d) i | Involvement in activities related to fossil fuel activities | Indicators number 4<br>Table #1 of Annex 1 | – Article 449a Regulation (EU) No 575/2013;<br>– Commission Implementing Regulation (EU) 2022/2453 ( 28 )<br>– Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk | Delegated Regulation (EU) 2020/1816, Annex II | | material | [7.4.2.1.15] |
| ESRS 2 SBM-1 | 40 (d) ii | Involvement in activities related to chemical production | Indicator number 9<br>Table #2 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II | | material | [7.4.2.1.15] |
| ESRS 2 SBM-1 | 40 (d) iii | Involvement in activities related to controversial weapons | Indicator number 14<br>Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1818 ( 29 ), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | | material | [7.4.2.1.15] |
| ESRS 2 SBM-1 | 40 (d) iv | Involvement in activities related to cultivation and production of tobacco | | | Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | | material | [7.4.2.1.15] |
| ESRS E1-1 | 14 | Transition plan to reach climate neutrality by 2050 | | | | Regulation (EU) 2021/1119, Article 2(1) | non-material | |
| ESRS E1-1 | 16 (g) | Undertakings excluded from Paris-aligned Benchmarks | | – Article 449a Regulation (EU) No 575/2013;<br>– Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2 | | non-material | |

| Disclosure requirement | Data point | Sustainability statement Appendix | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| ESRS E1-4 | 34 | GHG emission reduction targets | Indicator number 4<br><br>Table #2 of Annex 1 | – Article 449a<br>– Regulation (EU) No 575/2013;<br>– Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 6 | | non-material | |
| ESRS E1-5 | 38 | Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors ) | Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1 | – | | | non-material | |
| ESRS E1-5 | 37 | Energy consumption and mix | Indicator number 5<br><br>Table #1 of Annex 1 | – | | | non-material | |
| ESRS E1-5 | 40-43 | Energy intensity associated with activities in high climate impact sectors | Indicator number 6<br><br>Table #1 of Annex 1 | – | | | non-material | |
| ESRS E1-6 | 44 | Gross Scope 1, 2, 3 and Total GHG emissions | Indicators number 1 and 2<br><br>Table #1 of Annex 1 | – Article 449a;<br>– Regulation (EU) No 575/2013;<br>– Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1 | | non-material | |
| ESRS E1-6 | 53-55 | Gross GHG emissions intensity | Indicators number 3<br><br>Table #1 of Annex 1 | – Article 449a<br>– Regulation (EU) No 575/2013;<br>– Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 8(1) | | non-material | |
| ESRS E1-7 | 56 | GHG removals and carbon credits | | – | | Regulation (EU) 2021/1119, Article 2(1) | non-material | |
| ESRS E1-9 | 66 | Exposure of the benchmark portfolio to climate-related physical risk | | – | – Delegated Regulation (EU) 2020/1818, Annex II<br>– Delegated Regulation (EU) 2020/1816, Annex II | | non-material | |

| Disclosure requirement | Data point | Sustainability statement Appendix | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| ESRS E1-9 | 66 (a); 66 (c) | Disaggregation of monetary amounts by acute and chronic physical risk; Location of significant assets at material physical risk | | – Article 449a<br>– Regulation (EU) No 575/2013;<br>– Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk. | | | non-material | |
| ESRS E1-9 | 67 (c) | Breakdown of the carrying value of its real estate assets by energy-efficiency classes | | – Article 449a<br>– Regulation (EU) No 575/2013;<br>– Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral | | | non-material | |
| ESRS E1-9 | 69 | Degree of exposure of the portfolio to climate-related opportunities | | – | Delegated Regulation (EU) 2020/1818, Annex II | | non-material | |
| ESRS E2-4 | 28 | Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil | Indicator number 8<br>Table #1 of Annex 1<br>Indicator number 2<br>Table #2 of Annex 1<br>Indicator number 1<br>Table #2 of Annex 1<br>Indicator number 3<br>Table #2 of Annex 1 | – | | | non-material | |
| ESRS E3-1 | 9 | Water and marine resources | Indicator number 7<br>Table #2 of Annex 1 | – | | | non-material | |
| ESRS E3-1 | 13 | Dedicated policy | Indicator number 8<br>Table 2 of Annex 1 | – | | | non-material | |
| ESRS E3-4 | 14 | Sustainable oceans and seas | Indicator number 12<br>Table #2 of Annex 1 | – | | | non-material | |
| ESRS E3-4 | 28 c | Total water recycled and reused | Indicator number 6.2<br>Table #2 of Annex 1 | – | | | non-material | |
| ESRS E3-4 | 29 | Total water consumption in $m^3$ per net revenue on own operations | Indicator number 6.1<br>Table #2 of Annex 1 | – | | | non-material | |

| Disclosure requirement | Data point | Sustainability statement Appendix | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| ESRS 2 - IRO 1 -E4 | 16 (a) | | Indicator number 7<br>Table #1 of Annex 1 | – | | | non-material | |
| ESRS 2 - IRO 1 -E4 | 16 (b) | | Indicator number 10<br>Table #2 of Annex 1 | – | | | non-material | |
| ESRS 2 - IRO 1 -E4 | 16 (c) | | Indicator number 14<br>Table #2 of Annex 1 | – | | | non-material | |
| ESRS E4-2 | 24 (b) | Sustainable land / agriculture practices or policies | Indicator number 11<br>Table #2 of Annex 1 | – | | | non-material | |
| ESRS E4-2 | 24 (c) | Sustainable oceans / seas practices or policies | Indicator number 12<br>Table #2 of Annex 1 | – | | | non-material | |
| ESRS E4-2 | 24 (d) | Policies to address deforestation | Indicator number 15<br>Table #2 of Annex 1 | – | | | non-material | |
| ESRS E5-5 | 37 (d) | Non-recycled waste | Indicator number 13<br>Table #2 of Annex 1 | – | | | non-material | |
| ESRS E5-5 | 39 | Hazardous waste and radioactive waste | Indicator number 9<br>Table #1 of Annex 1 | – | | | non-material | |
| ESRS 2- SBM3 - S1 | 14 (f) | Risk of incidents of forced labour | Indicator number 13<br>Table #3 of Annex I | – | | | material | [7.4.2.2.1] |
| ESRS 2- SBM3 - S1 | 14 (g) | Risk of incidents of child labour | Indicator number 12<br>Table #3 of Annex I | – | | | material | [7.4.2.2.1] |
| ESRS S1-1 | 20 | Human rights policy commitments | Indicator number 9<br>Table #3 and Indicator number 11<br>Table #1 of Annex I | – | | | material | [7.4.2.2.3] |
| ESRS S1-1 | 21 | due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | | – | Delegated Regulation (EU) 2020/1816, Annex II | | material | [7.4.2.2.3] |
| ESRS S1-1 | 22 | Processes and measures for preventing trafficking in human beings | Indicator number 11<br>Table #3 of Annex I | – | | | material | [7.4.2.2.3] |
| ESRS S1-1 | 23 | Workplace accident prevention policy or management system | Indicator number 1<br>Table #3 of Annex I | – | | | material | [7.4.2.2.3] |
| ESRS S1-3 | 32 (c) | Grievance/ complaints handling mechanisms | Indicator number 5<br>Table #3 of Annex I | – | | | material | [7.4.2.2.5] |
| ESRS S1-14 | 88 (b) and (c) | Number of fatalities and number and rate of work-related accidents | Indicator number 2<br>Table #3 of Annex I | – | Delegated Regulation (EU) 2020/1816, Annex II | | non-material | |

| Disclosure requirement | Data point | Sustainability statement Appendix | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| ESRS S1-14 | 88 (e) | Number of days lost to injuries, accidents, fatalities or illness | Indicator number 3<br>Table #3 of Annex I | – | | | non-material | |
| ESRS S1-16 | 97 (a) | Unadjusted gender pay gap | Indicator number 12<br>Table #1 of Annex I | – | Delegated Regulation (EU) 2020/1816, Annex II | | non-material | |
| ESRS S1-16 | 97 (b) | Excessive CEO pay ratio | Indicator number 8<br>Table #3 of Annex I | – | | | non-material | |
| ESRS S1-17 | 103 (a) | Incidents of discrimination | Indicator number 7<br>Table #3 of Annex I | – | | | material | [7.4.2.2.13] |
| ESRS S1-17 | 104 (a) | Non-respect of UNGPs on Business and Human Rights and OECD | Indicator number 10<br>Table #1 and Indicator n. 14<br>Table #3 of Annex I | – | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1) | | material | [7.4.2.2.15] |
| ESRS 2-SBM3-S2 | 11 (b) | Significant risk of child labour or forced labour in the value chain | Indicators number 12 and n. 13<br>Table #3 of Annex I | – | | | non-material | |
| ESRS S2-1 | 17 | Human rights policy commitments | Indicator number 9<br>Table #3 and Indicator n. 11<br>Table #1 of Annex 1 | – | | | non-material | |
| ESRS S2-1 | 18 | Policies related to value chain workers | Indicator number 11 and n. 4<br>Table #3 of Annex 1 | – | | | non-material | |
| ESRS S2-1 | 19 | Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines | Indicator number 10<br>Table #1 of Annex 1 | – | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | non-material | |
| ESRS S2-1 | 19 | Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | | | Delegated Regulation (EU) 2020/1816, Annex II | | non-material | |
| ESRS S2-4 | 36 | Human rights issues and incidents connected to its upstream and downstream value chain | Indicator number 14<br>Table #3 of Annex 1 | | | | non-material | |
| ESRS S3-1 | 16 | Human rights policy commitments | Indicator number 9<br>Table #3 of Annex 1 and Indicator number 11<br>Table #1 of Annex 1 | | | | non-material | |
| ESRS S3-1 | 17 | Non-respect of UNGPs on Business and Human Rights, and OECD guidelines | Indicator number 10<br>Table #1 Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | non-material | |

| Disclosure requirement | Data point | Sustainability statement Appendix | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| ESRS S3-4 | 36 | Human rights issues and incidents | Indicator number 14<br>Table #3 of Annex 1 | | | | non-material | |
| ESRS S4-1 | 16 | Policies related to consumers and end-users | Indicator number 9<br>Table #3 and Indicator number 11<br>Table #1 of Annex 1 | | | | material | [7.4.2.3.2] |
| ESRS S4-1 | 17 | Non-respect of UNGPs on Business and Human Rights and OECD guidelines | Indicator number 10<br>Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | material | [7.4.2.3.2] |
| ESRS S4-1 | 35 | Human rights issues and incidents | Indicator number 14<br>Table #3 of Annex 1 | | | | material | [7.4.2.3.2] |
| ESRS G1-1 | 10 (b) | United Nations Convention against Corruption | Indicator number 15<br>Table #3 of Annex 1 | | | | non-material | |
| ESRS G1-1 | 10 (d) | Protection of whistle- blowers | Indicator number 6<br>Table #3 of Annex 1 | | | | non-material | |
| ESRS G1-4 | 24 (a) | Fines for violation of anti-corruption and anti-bribery laws | Indicator number 17<br>Table #3 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II) | | non-material | |
| ESRS G1-4 | 24 (b) | Standards of anti- corruption and anti-bribery | Indicator number 16<br>Table #3 of Annex 1 | | | | non-material | |

## Explanation of negative materiality assessment for ESRS E1 Climate change

Sanoptis conducted a Double Materiality Assessment in accordance with the ESRS, concluding that ESRS E1 – Climate Change is non-material for FY 2024. Sanoptis has been measuring its carbon footprint since 2022 (inside-out perspective) and will continue to do so voluntarily. Stakeholder interviews unanimously confirmed the non-materiality of E1, a conclusion further supported by an external physical climate risk analysis conducted with the climate consultancy firm South Pole (outside-in perspective). The Double Materiality Assessment will be periodically updated in line with ESRS requirements.

## Explanation of how material information to be disclosed in relation to material impacts, risks and opportunities has been determined

### See Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities

## 7.4.2.2 Social Information: Own Workforce

### 7.4.2.2.1 Material impacts, risks and opportunities and their interaction with strategy and business model

#### Description of types of employees and non-employees in its own workforce subject to material impacts

Sanoptis and its Network Partners' workforce (employees) includes ophthalmologists, opticians, optometrists, orthoptists, surgical technologists, medical staff, and administrative and support personnel.

Sanoptis defines non-employees as individuals who contribute to its operations but are not employed by Sanoptis or its Network Partners. This includes, but is not limited to, independent contractors, consultants, affiliated doctors (self-employed physicians working within the Network), and third-party personnel such as anesthetists engaged through external service providers.

At the holding level, Sanoptis provides its Network Partners with support in key areas such as Finance, People (HR), Marketing and M&A.

#### Material negative impacts occurrence (own workforce)

The material negative impact is limited to individual incidents.

#### Description of activities that result in positive impacts and types of employees and non-employees in its own workforce that are positively affected or could be positively affected

No material risks or opportunities have been identified under S1 – Own Workforce, rendering this disclosure not applicable.

#### Description of material risks and opportunities arising from impacts and dependencies on own workforce

No material risks or opportunities have been identified under S1 – Own Workforce, rendering this disclosure not applicable.

#### Description of material impacts on workers that may arise from transition plans for reducing negative impacts on environment and achieving greener and climate-neutral operations

Sanoptis does not anticipate any material impacts on its own workforce related to efforts to reduce environmental impacts and achieve greener, climate-neutral operations.

#### Information about type of operations at significant risk of incidents of forced labour or compulsory labour

Sanoptis' Network Partners provide ophthalmological services in Central Europe, which are not considered at significant risk of incidents of forced labour or compulsory labour.

#### Information about countries or geographic areas with operations considered at significant risk of incidents of forced labour or compulsory labour

Sanoptis' Network Partners provide ophthalmological services in Central Europe, which are not considered at significant risk of incidents of forced labour or compulsory labour.

#### Information about type of operations at significant risk of incidents of child labour

Sanoptis' Network Partners provide ophthalmological services in Central Europe, which are not considered at significant risk of incidents of child labour.

#### Information about countries or geographic areas with operations considered at significant risk of incidents of child labour

Sanoptis' Network Partners provide ophthalmological services in Central Europe, which are not considered at significant risk of incidents of child labour.

### Disclosure of how understanding of people in its own workforce / value chain workers with particular characteristics, working in particular contexts, or undertaking particular activities may be at greater risk of harm has been developed

No specific group of employees has been identified as being at greater risk.

### Disclosure of which of material risks and opportunities arising from impacts and dependencies on people in its own workforce relate to specific groups of people

Not applicable, as no material risks or opportunities have been identified under ESRS S1 – Own workforce.

### All people in its own workforce who can be materially impacted by undertaking are included in scope of disclosure

Sanoptis recognizes that all employees within its workforce may potentially face mental health challenges, such as stress and anxiety, stemming from factors like high workloads, time constraints, and deadline pressures. These challenges may originate from Sanoptis' own operations or from effects across the value chain, including related services and business relationships. Regardless of their source, Sanoptis is dedicated to supporting mental health by implementing measures designed to mitigate these risks, enhance the work environment, and reduce stress factors.

## 7.4.2.2.2 Policies to manage material impacts, risks and opportunities related to its own workforce

### Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce

Sanoptis has not adopted a specific policy to address this negative impact. Mental health is a highly individual topic, with varied factors influencing each person's experience. As such, Sanoptis believes that a single, standardized policy would not effectively address these challenges. Instead, Sanoptis provides support through measures *(See Description of action taken, planned or underway to prevent or mitigate negative impacts on own workforce)* offering practical resources and solutions to assist its workforce.

### Description of key contents of policy

No policy has been adopted at this time, rendering this disclosure not applicable.

### Description of scope of policy or of its exclusions

**See Description of key contents of policy**

### Description of most senior level in organisation that is accountable for implementation of policy

**See Description of key contents of policy**

### Disclosure of third-party standards or initiatives that are respected through implementation of policy

**See Description of key contents of policy**

### Description of consideration given to interests of key stakeholders in setting policy

**See Description of key contents of policy**

### Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

**See Description of key contents of policy**

## 7.4.2.2.3 Policies related to own workforce

### Description of relevant human rights policy commitments relevant to own workforce

At the time of writing this sustainability statement, Sanoptis has not established any formal human rights policy commitments specifically addressing its own workforce.

### Disclosure of general approach in relation to respect for human rights including labour rights, of people in its own workforce

Not applicable, as Sanoptis has not made any formal human rights policy commitments specific to its own workforce.

### Disclosure of general approach in relation to engagement with people in its own workforce

**See Statement in case the undertaking has not adopted a general process to engage with its own workforce**

### Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts

Sanoptis has not been made aware of any human rights impact within its workforce in 2024. Consequently, a specific general approach to providing or enabling remedies has not been established at the time of writing this sustainability statement.

### Disclosure of whether and how policies are aligned with relevant internationally recognised instruments

Not applicable, as no such policies have been developed at the time of writing this sustainability statement.

### Policies explicitly address trafficking in human beings, forced labour or compulsory labour and child labour

Sanoptis' Code of Conduct explicitly addresses forced labour and child labour; however, human trafficking and compulsory labour are not specifically addressed as standalone topics.

### Workplace accident prevention policy or management system is in place

Sanoptis and its Network Partners strive to meet regulatory requirements, including those related to workplace safety, which are mandated by law in all countries where Sanoptis operates. While Sanoptis has not implemented a network-wide workplace accident prevention policy, its Network Partners independently determine the appropriate actions to fulfill these legal obligations. To support their efforts, the Sanoptis Academy offers a training course on workplace safety and accident prevention, which Network Partners can utilize as part of their approach to meeting these requirements.

Furthermore, Sanoptis' Code of Conduct states that "Conducting our business in a sustainable way is one of our highest priorities. We consistently observe the regulations around environment, safety and health and try to exceed the applicable standards wherever possible. Certifications such as ISO 45001 Occupational Health and Safety are encouraged and supported. We treat natural resources with care and aspire to provide our services in the most sustainable way possible. By complying with occupational health and safety regulations and practices, we ensure that the safety, health and personal integrity of our employees, our patients, and the general public are not endangered.

### Specific policies aimed at elimination of discrimination are in place

Sanoptis' Diversity, Equality, and Inclusion Policy aims to promote true diversity, equality, and inclusion throughout the Sanoptis Network.

### Grounds for discrimination are specifically covered in policy

Grounds for discrimination are explicitly addressed in Sanoptis' Diversity, Equality, and Inclusion (D&I) Policy.

### Disclosure of specific policy commitments related to inclusion and (or) positive action for people from groups at particular risk of vulnerability in own workforce

No specific policy commitments are included in Sanoptis' Diversity, Equality and Inclusion Policy.

### Disclosure of whether and how policies are implemented through specific procedures to ensure discrimination is prevented, mitigated and acted upon once detected, as well as to advance diversity and inclusion

Sanoptis shared its Diversity, Equality, and Inclusion (D&I) Policy with Network Partners via email and presented its content during business update meetings. The policy includes contact information for the Compliance Manager, and employees can seek support from the People (HR) and the Compliance departments for related queries.

## 7.4.2.2.4 Processes for engaging with own workers and workers' representatives about impacts

### Engagement occurs with own workforce or their representatives

**See Statement in case the undertaking has not adopted a general process to engage with its own workforce**

### Disclosure of the stage at which engagement occurs, type of engagement and frequency of engagement

**See Statement in case the undertaking has not adopted a general process to engage with its own workforce**

### Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens and that results inform undertaking's approach

**See Statement in case the undertaking has not adopted a general process to engage with its own workforce**

### Disclosure of Global Framework Agreement or other agreements related to respect of human rights of workers

**See Statement in case the undertaking has not adopted a general process to engage with its own workforce**

### Disclosure of how the effectiveness of engagement with its workforce is assessed

**See Statement in case the undertaking has not adopted a general process to engage with its own workforce**

### Disclosure of steps taken to gain insight into perspectives of people in its own workforce that may be particularly vulnerable to impacts and (or) marginalised

**See Statement in case the undertaking has not adopted a general process to engage with its own workforce**

### Statement in case the undertaking has not adopted a general process to engage with its own workforce

The Sanoptis Network spans over 400 locations, each with its own workforce and distinct workplace culture. Adopting a decentralized approach, Sanoptis intentionally limits its involvement in day-to-day operations to honor this diversity and empower local leadership. Consequently, a centralized, network-wide workforce engagement process has not been adopted. Instead, local Commercial Directors are responsible for developing engagement practices tailored to the specific needs of their teams.

## 7.4.2.2.5 Processes to remediate negative impacts and channels for own workers to raise concerns

### Disclosure of general approach to and processes for providing or contributing to remedy where an undertaking has caused or contributed to a material negative impact on people in its workforce

Sanoptis acknowledges the potential for employees to experience mental health challenges, such as stress and anxiety, due to factors like high workloads, time constraints, and deadline pressures. Under the General Data Protection Regulation (GDPR), specifically Article 9, processing health-related data is prohibited. As health data is considered sensitive, Sanoptis does not collect or access such information and therefore has no knowledge or information to provide regarding material negative impacts on employees' mental health.

### Disclosure of specific channels in place for its workforce to raise concerns or needs directly with undertaking and have them addressed

Sanoptis has established a whistleblowing hotline accessible through four channels: email, telephone, post, and anonymously via an online tool. These channels are available to all employees across the Sanoptis Network, providing secure and confidential options for raising concerns.

Additionally, Sanoptis provides a dedicated form on its website, allowing individuals to report instances of inhumane working conditions, environmental misconduct, or other misconduct.

### Grievance or complaints handling mechanisms related to employee matters exist

**See Disclosure of specific channels in place for its workforce to raise concerns or needs directly with undertaking and have them addressed**

### Disclosure of processes through which undertaking supports or requires the availability of channels

Sanoptis seeks to promote the availability and awareness of its whistleblowing channels through clear communication and regular reinforcement. Each local Commercial Director was informed about the whistleblowing channels via email, and this information is reiterated during exchanges with local Commercial Directors or during other business events to maintain awareness and accessibility.

### Disclosure of how issues raised and addressed are tracked and monitored and how effectiveness of channels is ensured

Sanoptis monitors issues raised through its whistleblowing channels. The ESG & Compliance Manager oversees reports submitted via email, telephone, post, the anonymous online tool, and the website.

Reports submitted through the anonymous tool are assigned a unique case number, allowing the reporter to log in and monitor the status of their submission. Access to these reports is strictly limited to the ESG & Compliance Manager to ensure confidentiality.

### Disclosure of whether and how it is assessed that its own workforce is aware of and trust structures or processes as way to raise their concerns or needs and have them addressed

Sanoptis seeks to ensure that its workforce trusts the structures and processes in place for raising concerns or needs by offering the option to submit reports anonymously. Awareness is reinforced through communication with local Commercial Directors via email and regularly reiterated by Sanoptis' People team during HR-round tables, which are typically conducted on a quarterly basis.

### Statement in case the undertaking has not adopted a channel for raising concerns

Not applicable, as channels for raising concerns are in place.

## 7.4.2.2.6 Policies related to own workforce

### Policies regarding protection against retaliation for individuals that use channels to raise concerns or needs are in place

Sanoptis has not yet adopted a standalone whistleblowing policy. However, in the countries where Sanoptis operates, whistleblowers are protected from retaliation under various national regulations:

- **Germany:** Hinweisgeberschutzgesetz (“HinSchG”)
- **Austria:** HinweisgeberInnenschutzgesetz (“HSchG”)
- **Greece:** Law 4990/2022
- **Spain:** Act 2/2023 on the Protection of Persons Who Report Regulatory Breaches and Anti-Corruption Measures
- **Italy:** Legislative Decree No. 24 of March 10, 2023

In Switzerland, while no standalone whistleblowing regulation exists, protections against unjustified dismissals are provided under the Swiss Code of Obligations, Article 336, which prohibits dismissals that violate good faith or constitutional rights.

## 7.4.2.2.7 Actions and resources in relation to own workforce

### Description of action taken, planned or underway to prevent or mitigate negative impacts on own workforce

To address the material IRO identified, Sanoptis has partnered with “OpenUp” to provide free access to mental well-being resources. This includes one-on-one sessions with professional psychologists, regular mental health check-ins, live and on-demand masterclasses, mindfulness exercises, and a curated library of expert articles and tools. Additionally, Sanoptis’ People Team is actively developing a framework agreement with “OpenUp” to extend these benefits to Sanoptis’ Network Partners under attractive conditions.

### Description of scope of key action

As of December 31, 2024, this offering is exclusively available to employees of Sanoptis Holding companies.

### Time horizon under which key action is to be completed

Ongoing (Long-term)

### Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

**See Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has caused or contributed to a material negative impact on people in its own workforce**

### Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

Not applicable, as no prior periods exist.

## 7.4.2.2.8 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

### Disclosure on whether and how action has been taken to provide or enable remedy in relation to actual material impact

**See Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has caused or contributed to a material negative impact on people in its own workforce**

### Description of additional initiatives or actions with primary purpose of delivering positive impacts for own workforce

Each of Sanoptis’ network partners independently manages fringe benefits for their workforce, tailored to their specific needs.

### Description of how effectiveness of actions and initiatives in delivering outcomes for own workforce is tracked and assessed

**See Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has caused or contributed to a material negative impact on people in its own workforce**

### Description of process through which it identifies what action is needed and appropriate in response to particular actual or potential negative impact on own workforce

Sanoptis' People Team identifies necessary actions based on employee feedback and market research. Mental health emerged as a key focus area, resulting in an agreement with 'OpenUp' to provide resources to Sanoptis Holding employees. Following the conclusions of the 2024 Double Materiality Assessment, Sanoptis is developing a framework agreement to make these resources available to Network Partners under favorable terms.

### Description of what action is planned or underway to mitigate material risks arising from impacts and dependencies on own workforce and how effectiveness is tracked

Sanoptis did not identify any material risks or opportunities related to its own workforce, rendering this disclosure requirement not applicable.

### Description of what action is planned or underway to pursue material opportunities in relation to own workforce

Sanoptis did not identify any material risks or opportunities related to its own workforce, rendering this disclosure requirement not applicable.

### Disclosure of whether and how it is ensured that own practices do not cause or contribute to material negative impacts on own workforce

**See Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce**

### Disclosure of resources allocated to the management of material impacts

Sanoptis has determined that the resources allocated to the management of material impacts are not material. Consequently, a disclosure regarding these allocations is not warranted.

## 7.4.2.2.9 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

### Disclosure of whether and how own workforce or workforce' representatives were engaged directly in setting targets

Not applicable, as no targets have been set.

### Disclosure of whether and how own workforce or workforce' representatives were engaged directly in tracking performance against targets

Not applicable, as no targets have been set.

### Disclosure of whether and how own workforce or workforce' representatives were engaged directly in identifying lessons or improvements as result of undertakings performance

Not applicable, as no targets have been set.

## 7.4.2.2.10 If a target(s) has not been set

### Effectiveness of policies and actions is tracked in relation to material sustainability-related impact, risk and opportunity

Sanoptis is unable to track the effectiveness of its action related to this material impact due to GDPR restrictions, particularly concerning the processing of sensitive health data as defined under Article 9 of the GDPR. Sanoptis seeks to formalize a framework agreement with "OpenUp" in 2025 to facilitate access to mental health support services for its Network Partners.

### Description of processes through which effectiveness of policies and actions is tracked in relation to material sustainability-related impact, risk and opportunity

See Effectiveness of policies and actions is tracked in relation to material sustainability-related impact, risk and opportunity

### Base year from which progress is measured

See Effectiveness of policies and actions is tracked in relation to material sustainability-related impact, risk and opportunity

## 7.4.2.2.11 Characteristics of the undertaking's employees

### Employees, by gender

| Gender | # of employees |
|---|---|
| Women | 3,888 |
| Men | 804 |
| Other | 0 |
| Not Disclosed | 0 |
| Total | 4,692 |

### Employees, by contract type, by gender

| Type | Gender | # of employees |
|---|---|---|
| Permanent employees | Women | 3,596 |
| Permanent employees | Men | 728 |
| Permanent employees | Other | 0 |
| Permanent employees | Not Disclosed | 0 |
| Temporary employees | Women | 155 |
| Temporary employees | Men | 32 |
| Temporary employees | Other | 0 |
| Temporary employees | Not Disclosed | 0 |
| Non-guaranteed hours employees | Women | 137 |
| Non-guaranteed hours employees | Men | 44 |
| Non-guaranteed hours employees | Other | 0 |
| Non-guaranteed hours employees | Not Disclosed | 0 |

### Headcount of employees by geographical areas

| Geographical area | # of employees |
|---|---|
| Germany | 3,828 |
| Switzerland | 511 |
| Spain | 167 |
| Greece | 98 |
| Italy | 66 |
| Austria | 22 |

**Describe the methodologies and assumptions used to compile the data, including whether the numbers are reported: i. in headcount, full-time equivalent (FTE), or using another methodology; ii. at the end of the reporting period, as an average across the reporting period, or using another methodology**

Numbers are recorded as headcounts as of December 31st, 2024.

**Number of employees (headcount)**

4,692

### 7.4.2.2.12 Turnover rate

**Number of employees who have left the undertaking**

938

**Percentage of employee turnover**

20%

### 7.4.2.2.13 Incidents of discrimination, complaints and corrective actions taken

**Total number of incidents of discrimination, including harassment, during the reporting period**

5

**Number of complaints filed through channels for people in own workforce to raise concerns**

0

**Number of complaints filed to National Contact Points for OECD Multinational Enterprises**

0

**Disclosure of contextual information necessary to understand data and how data has been compiled (work-related grievances, incidents and complaints related to social and human rights matters)**

Not applicable

### 7.4.2.2.14 Legal proceedings, fines and settlements associated with employment discrimination

**Amount of material fines, penalties, and compensation for damages as result of violations regarding social and human rights factors**

0 EUR

**Information about reconciliation of material fines, penalties, and compensation for damages as result of violations regarding social and human rights factors with most relevant amount presented in financial statements**

Not applicable

## 7.4.2.2.15 Incidents, complaints and severe human rights impacts

### Number of severe human rights issues and incidents connected to own workforce

0

### Number of severe human rights issues and incidents connected to own workforce that are cases of non respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises

0

### No severe human rights issues and incidents connected to own workforce have occurred

Sanoptis has no knowledge of any severe human rights issues or incidents occurring in 2024.

### Amount of material fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce

0 EUR

### Information about reconciliation of amount of material fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce with most relevant amount presented in financial statements

Not applicable

## 7.4.2.3 Social Information: Consumer and end-users

### 7.4.2.3.1 Material impacts, risks and opportunities and their interaction with strategy and business model

#### Description of types of consumers and end-users subject to material impacts

All patients undergoing surgery at a Sanoptis Network Partner could theoretically be impacted by the potential material negative impact, as all surgeries carry a certain degree of risk. All patients benefit from the positive impact of receiving high-quality care across the Network.

#### Type of consumers and end-users subject to material impacts by own operations or through value chain

None of the categories of consumers and end-users listed in ESRS S4 10a) i-iv accurately reflect the types of consumers and end-users subject to the identified material impacts.

#### Material negative impacts occurrence (consumers and end-users)

Potential material negative impact is related to individual incidents

#### Description of activities that result in positive impacts and types of consumers and end-users that are positively affected or could be positively affected

Sanoptis' Network Partners focus on treating eye conditions and improving vision, or preventing further deterioration, which positively contributes to enhancing patients' quality of life.

#### Disclosure of how understanding of how consumers and end-users with particular characteristics, working in particular contexts, or undertaking particular activities may be at greater risk of harm has been developed

Each patient is evaluated individually by specialized doctors, drawing on medical documentation provided by their general practitioner or general healthcare provider. This approach allows Sanoptis' Network Partners to identify which patients may be more susceptible to adverse outcomes based on their unique characteristics or medical history, enabling the medical teams to apply targeted safeguards.

#### How the interests, views and rights of its consumers and/or end-users, including respect for their human rights, inform its strategy and business model

Providing the best possible care for patients naturally informs the business model and strategy of Sanoptis. Sanoptis' Network Partners aim to prioritize patient satisfaction, as it supports long-term relationships and aligns with the broader goal of sustainable financial success.

#### How does your company identify potential and actual impacts related to your business model and strategy on your consumer / end-user and vice versa, who are your consumer / end-user

The material impacts identified are connected to Sanoptis' business model, as they are directly related to Sanoptis' core activities (providing ophthalmological services). These activities naturally inform Sanoptis' strategy and business model.

Consumers and end-users are patients seeking ophthalmological care at a Sanoptis Network Partner's practice or clinic.

#### What is the relationship between the material risks and opportunities arising from impacts and dependencies on consumers / end-users and your strategy and business model

No material risks or opportunities related to dependencies on consumers or end-users were identified in Sanoptis' Double Materiality Assessment, rendering this disclosure requirement not applicable.

## 7.4.2.3.2 Policies to manage material impacts, risks and opportunities related to consumers and end-users

### Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users

Adhering to Sanoptis' decentralized business model, no harmonized, network-wide patient safety policy is in place. As providers of ophthalmological services in Germany, Switzerland, Austria, Italy, Spain, and Greece, regulatory requirements govern every aspect of Sanoptis' Network Partners' operations, including those related to patient safety and quality management. Each Network Partner is responsible for ensuring compliance with the regulatory requirements in their respective jurisdictions. This structure enables Network Partners to address patient care in a way that aligns with their specific operational needs and local standards.

### Description of key contents of policy

No harmonized, standardized policy has been adopted at this time, rendering this disclosure not applicable.

### Description of scope of policy or of its exclusions

**See Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users**

### Description of most senior level in organisation that is accountable for implementation of policy

**See Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users**

### Disclosure of third-party standards or initiatives that are respected through implementation of policy

**See Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users**

### Description of consideration given to interests of key stakeholders in setting policy

**See Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users**

### Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

**See Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users**

### Description of relevant human rights policy commitments relevant to consumers and/or end-users

Sanoptis currently does not have a standalone, standardized patient safety policy in place but has incorporated certain human rights, as they relate to patient safety, into its Code of Conduct:

#### Right to Freedom of Torture

The Right to Freedom from Torture is reflected in Sanoptis' commitment to prohibiting any form of restraint on patients. Additionally, no treatment is administered without the patient's informed consent.

#### Right to Freedom of Expression

The Right to Freedom of Expression is reflected in the patient's Right of Free Choice. While this human right may not directly translate to the healthcare delivery context, the ability of patients to freely choose their healthcare professional or facility represents an important aspect of patient autonomy. For outpatient treatments, patients have the right to decide where and by whom they wish to be treated.

### Right to Education

The Right to Education encompasses several key aspects of patient rights, all of which are aimed at ensuring patients are fully informed and empowered in their healthcare decisions:

1. Right to Information – Patients are informed in a clear and appropriate manner about their health, medical examinations, treatment options, risks, prognosis, and the financial aspects of their care.
2. Free and Informed Consent – Treatments are prescribed only with the patient's free and informed consent, provided they are capable of sound judgment. Patients have the right to refuse care, interrupt treatment, or leave a healthcare facility if they choose.
3. Access to Case Files – Patients may consult their own case file, have its contents explained to them, and request originals or copies of these documents free of charge. These documents can be forwarded to the healthcare professional of the patient's choice.

### Right to Privacy

Sanoptis strives to uphold the Right to Privacy through a strong emphasis on patient confidentiality. Healthcare professionals are required to maintain professional secrecy, also referred to as medical confidentiality. Information obtained during professional activities is treated with strict confidentiality and is not shared without the patient's consent, unless required by law. This obligation also extends to communications between healthcare professionals.

## Disclosure of general approach in relation to respect for human rights of consumers and end-users

Sanoptis has no knowledge of any human rights impacts related to consumers or end-users.

## Disclosure of general approach in relation to engagement with consumers and/or end-users

Engagement with patients occurs in person throughout the care process.

## Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts

Sanoptis has no knowledge of any human rights impacts related to consumers or end-users and therefore cannot disclose a general approach to providing or enabling remedies for potential future impacts.

## Description of whether and how policies are aligned with relevant internationally recognised instruments

Sanoptis' Code of Conduct integrates key elements of relevant internationally recognized instruments, such as the Universal Declaration of Human Rights, focusing on the sections most relevant to Sanoptis' operations.

## Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve consumers and/or end-users

**See Disclosure of general approach in relation to respect for human rights of consumers and end-users**

Sanoptis has no knowledge of non-respect of human rights involving consumers or end-users occurring in its downstream value chain.

### 7.4.2.3.3 Processes for engaging with consumers and end-users about impacts

#### Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts

**See Engagement occurs with consumers and end-users or their legitimate representatives directly, or with credible proxies and Disclosure of how effectiveness of engagement with consumers and end-users is assessed**

#### Engagement occurs with consumers and end-users or their legitimate representatives directly, or with credible proxies

**See Disclosure of general approach in relation to engagement with consumers and/or end-users**

#### Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement

As providers of ophthalmological services, the primary mode of engagement is face-to-face throughout the care process, starting from the initial consultation, continuing throughout treatment, and, for patients undergoing surgery, follow-up care is scheduled the day after the procedure. The frequency of interactions depends on the complexity of the treatment, with more complex cases requiring more frequent consultation and communication.

#### Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens and that results inform undertakings approach

Within Sanoptis' decentralized Network, local management teams, including Commercial Directors and lead physicians, take responsibility for patient engagement at their respective clinics and practices. This approach allows each Network Partner to develop patient care strategies that are tailored to the specific needs and feedback of their patients.

#### Disclosure of how effectiveness of engagement with consumers and end-users is assessed

Each Network Partner within Sanoptis' decentralized Network has its own approach to engaging with consumers and end-users. As a result, no generalized approach to assessing the effectiveness of engagement can be disclosed.

#### Disclosure of steps taken to gain insight into perspectives of consumers and end-users / consumers and end-users that may be particularly vulnerable to impacts and (or) marginalised

**See Disclosure of whether and how understanding of how consumers and end-users with particular characteristics, working in particular contexts, or undertaking particular activities may be at greater risk of harm has been developed**

#### Statement in case the undertaking has not adopted a general process to engage with consumers and/or end-users

**See Disclosure of how effectiveness of engagement with consumers and end-users is assessed**

## 7.4.2.3.4 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

### Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has identified that it connected with a material negative impact on consumers and end-users

Sanoptis' Network Partners provide or contribute remedy on a case-by-case basis, guided by the findings of their medical teams. There is no general approach, as each situation is unique, and actions are determined based on the specific circumstances and professional judgment of the medical staff involved.

### Disclosure of specific channels in place for consumers and end-users to raise concerns or needs directly with undertaking and have them addressed

Each Network Partner within Sanoptis' decentralized Network maintains its own channels for consumers and end-users to raise concerns or needs. These include in-person interactions throughout the care process, as well as email, telephone, and, where available, online channels.

### Disclosure of processes through which undertaking supports or requires availability of channels

**See Disclosure of specific channels in place for consumers and end-users to raise concerns or needs directly with undertaking and have them addressed**

### Disclosure of how issues raised and addressed are tracked and monitored and how effectiveness of channels is ensured

Within Sanoptis' decentralized Network, local management teams, including Commercial Directors and lead physicians, are responsible for addressing and tracking the issues raised and ensuring the effectiveness of the channels in place. These efforts are supported by Sanoptis' Group functions, conducting online review analyses on a monthly basis.

### Disclosure of how it is assessed that consumers and end-users are aware of and trust structures or processes as way to raise their concerns or needs and have them addressed

Sanoptis does not have a formalized process in place to assess whether consumers and end-users are aware of and trust the structures or processes available for raising concerns or needs. However, as patients interact directly with Network Partners throughout the care process, it is assumed they are naturally aware of the available channels for communication. These commonly include email, telephone, in-person interactions during the care process, and, where available, online platforms.

### Policies regarding protection against retaliation for individuals that use channels to raise concerns or needs are in place

Sanoptis does not have a network-wide policy in place that directly prohibits retaliation against individuals who use channels to raise concerns or needs.

### Statement in case the undertaking has not adopted a general process to engage with consumers and/or end-users

**See Disclosure of how effectiveness of engagement with consumers and end-users is assessed**

## 7.4.2.3.5 Taking action on material impacts on consumers and end-users

### Description of action planned or underway to prevent, mitigate or remediate material negative impacts on consumers and end-users

#### Selecting Network Partners Diligently

Sanoptis strives to follow a selective acquisition process, evaluating potential Network Partners to assess their alignment with Sanoptis' standards and values. As part of this process, legal due diligence is conducted by lawyers specialized in healthcare to evaluate the potential partner's legal standing and reputational background before any binding agreement is signed. If concerns regarding business practices arise, the transaction may not proceed.

Sanoptis expects this measure to help ensure only partners aligned with its standards and values are integrated into the Network, reducing potential legal and reputational risks.

| Time horizon | Scope |
|---|---|
| Ongoing (Long-term) | Sanoptis Holding Companies |

#### Enhancing Patient Care and Wellbeing through Targeted Investments

Sanoptis focuses on advancing patient care by making strategic investments. Framework agreements with manufacturers of ophthalmological equipment seek to provide Network Partners with access to advanced technology on competitive terms. Investments in facilities further improve the patient environment while supporting operational efficiency.

In 2024, Sanoptis partnered with RetinAI, a provider of AI and data management solutions, which seek to enhance diagnostic capabilities. This partnership aims to improve diagnostic accuracy for conditions such as age-related macular degeneration (AMD), diabetic retinopathy, and retinal vein occlusion through Artificial Intelligence (AI) and advanced Optical Coherence Tomography (OCT) imaging. These tools aim to assist Network Partners in detecting early signs of disease progression and supporting timely treatment decisions.

In 2024, RetinAI was introduced at two locations in Hamburg and Augsburg, with plans for a network-wide rollout starting 2025.

These investments seek to enhance diagnostic accuracy and support early detection of conditions, thereby enabling more timely treatment decisions.

| Time horizon | Scope | Significant OPEX/CAPEX allocation |
|---|---|---|
| Ongoing (Long-term) | Framework agreements: Sanoptis majority-owned network partners RetinAI Software access: As outlined above | Yes (not public knowledge, statement included in General information) |

#### Compliance with Regulatory Requirements

As providers of ophthalmological services in Germany, Switzerland, Austria, Greece, Italy, and Spain, Sanoptis operates within a framework of strict regulatory standards governing all aspects of its operations. Sanoptis' Network Partners strive to meet all applicable requirements within their jurisdictions.

To support these efforts, Sanoptis offers Network Partners access to the "Sanoptis Academy," an e-learning platform featuring courses on anatomy, medical imaging, equipment usage, practice procedures, and patient interaction. Additionally, regulatory-required training - such as GDPR, IT Security, Occupational Health and Safety, First Aid for Medical Emergencies, and Hygiene and Infection Control - is available to all Network Partners.

In alignment with Sanoptis' decentralized business model, these training programs are currently optional. Many Network Partners have developed their own training initiatives, often in collaboration with external providers, to meet regulatory requirements. Sanoptis offers these resources as a supplementary option for Network Partners seeking additional support to streamline compliance efforts.

These measures seek to assist Network Partners in meeting regulatory obligations, helping to ensure consistent training standards and supporting overall compliance efforts.

| Time horizon | Scope |
|---|---|
| Ongoing (Long-term) | Sanoptis majority-owned network partners |

### Securing Qualified Medical Professionals for Patient-Facing Care

Sanoptis' Network Partners strive to fill all patient-facing positions with qualified medical professionals who undergo a thorough selection process. For surgeons, the lead physician reviews each candidate's qualifications and experience to assess their suitability. Sanoptis supports its doctors by offering paid leave for Continuing Medical Education, helping them stay up to date with medical advancements and best practices.

These measures seek to ensure that patients receive care from qualified professionals who stay current on medical advancements and best practices.

| Time horizon | Scope |
|---|---|
| Ongoing (Long-term) | Sanoptis majority-owned network partners |

## Description of action to provide or enable remedy in relation to an actual material impact

**See Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has identified that it connected with a material negative impact on consumers and end-users**

## Description of additional initiatives or processes with primary purpose of delivering positive impacts for consumers and end-users

While the key actions described above represent the important measures in place, they do not encompass all efforts undertaken by Sanoptis' Network Partners to support patient safety. Reporting on every individual operational procedure would not be practical or purposeful. Instead, these highlighted actions reflect some of the core practices and standards that guide Sanoptis' Network Partners' comprehensive approach to patient safety.

## Description of how effectiveness of actions or initiatives in delivering outcomes for consumers and end-users is tracked and assessed

Each local Commercial Director, in collaboration with the lead physician, is responsible for upholding patient safety measures within their respective practices and clinics. While approaches to tracking effectiveness vary across the Network, patient satisfaction questionnaires and in-person feedback are commonly used by Sanoptis' Network Partners. At the group level, Sanoptis Holding conducts online review analyses to identify significant declines in service quality, implementing targeted actions as needed.

## Description of approach to identifying what action is needed and appropriate in response to particular actual or potential material negative impact on consumers and end-users

**See Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has identified that it connected with a material negative impact on consumers and end-users**

## Description of approach to taking action in relation to specific material impacts on consumers and end-users

In light of the material impacts identified, Sanoptis does not consider any actions necessary regarding product design, marketing, sales, or broader industry collaboration with relevant parties.

## Description of approach to ensuring that processes to provide or enable remedy in event of material negative impacts on consumers and end-users are available and effective in their implementation and outcomes

Sanoptis' Network Partners staff surgical rooms with experienced, specialized medical professionals who are prepared to identify and address negative impacts as they occur, thereby helping to ensure that remedy processes are available and effectively implemented.

## Description of what action is planned or underway to mitigate material risks arising from impacts and dependencies on consumers and end-users and how effectiveness is tracked

No material risks related to consumers and end-users were identified in Sanoptis' Double Materiality Assessment, rendering this disclosure not applicable.

### Description of what action is planned or underway to pursue material opportunities in relation to consumers and end-users

No material risks related to consumers and end-users were identified in Sanoptis' Double Materiality Assessment, rendering this disclosure not applicable.

### Disclosure of how it is ensured that own practices do not cause or contribute to material negative impacts on consumers and end-users

Sanoptis strives to provide the highest quality ophthalmological care for its patients, with practices inherently designed to avoid causing or contributing to the material potential negative impact.

### Disclosure of severe human rights issues and incidents connected to consumers and/or end-users

Sanoptis has no knowledge of any severe human rights issues or incidents involving consumers and/or end-users in the reporting period.

### Disclosure of resources allocated to management of material impacts

**See Description of action planned or underway to prevent, mitigate or remediate material negative impacts on consumers and end-users**

## 7.4.2.3.6 If a target(s) has not been set

### Description of reasons why the undertaking has not set measurable outcome-oriented targets

For FY2024, Sanoptis is initiating its reporting under the Corporate Sustainability Reporting Directive (CSRD) and has not yet had the capacity to propose and obtain approval for sustainability targets.

### Description of processes through which effectiveness of policies and actions is tracked in relation to material sustainability-related impact, risk and opportunity

Sanoptis currently does not track each patient safety-related action on an individual basis.

### Disclosure of whether and how consumers and end-users were engaged directly in setting targets

Not applicable, as no targets have been established at the time of writing this sustainability statement.

### Disclosure of whether and how consumers and end-users were engaged directly in tracking performance against targets

Not applicable, as no targets have been established at the time of writing this sustainability statement.

### Disclosure of whether and how consumers and end-users were engaged directly in identifying lessons or improvements as result of undertaking's performance

Not applicable, as no targets have been established at the time of writing this sustainability statement.

## 7.4.2.4 Entity Specific Information: Doctor's Succession

### 7.4.2.4.1 Introduction and policies

#### Description of the process to identify and assess entity-specific impacts, risks, and opportunities

Sanoptis has identified doctor succession as a material, entity-specific topic from both a potential negative impact and financial risk perspective. Recognizing that the existing ESRS frameworks do not specifically address the nuances of doctors' succession in specialized healthcare services, Sanoptis has determined the necessity to report comprehensively on this topic as an entity-specific issue.

#### Description of key contents of policy

Sanoptis acknowledges that the departure of doctors - whether due to retirement, career changes, or unforeseen circumstances - can present risks to both the quality of care and the financial performance of Network Partners if not proactively managed. To mitigate these risks, Sanoptis has developed a succession planning and recruitment framework to meet the needs of the Network. The goal of this framework is to provide Network Partners with comprehensive recruitment support and to create attractive employment conditions that help facilitate consistent and sufficient staffing levels of doctors across all locations.

Furthermore, Sanoptis supports Network Partners in achieving accreditation as recognized medical training institutions. Once accredited, Network Partners not only provide support to assistant doctors during their residency but also aim to retain them as valuable members of the Network upon completing their specialist training.

#### Description of scope of policy or of its exclusions

Sanoptis majority-owned network partners

#### Description of most senior level in organisation that is accountable for implementation of policy

Group Chief Executive Officer

#### Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

Local Commercial Directors have been regularly informed about this framework during Business Update Meetings and via E-Mail. HR Roundtables are conducted typically 4 times a year, where updates on recruiting and employer branding services are communicated directly to the local teams. Additionally, local Commercial Directors have direct access to the Group Chief of Staff, who works closely with the Group Chief Executive Officer in overseeing this framework.

### 7.4.2.4.2 Actions

#### Disclosure of key action

**Enhancing Central Services**

Sanoptis reaffirmed its commitment to enhancing central services for its Network Partners with the appointment of a Group Chief Services Officer in late 2023. This role is focused on expanding and diversifying the range of services offered by the holding companies to their Network Partners. As part of this initiative, an internal recruitment department was established. Following the successful recruitment of a Senior Manager of Recruiting & Employer Branding, the team has grown to three members, with plans to expand further in 2025 and beyond.

The recruitment team offers specialized training to the recruiting managers of Sanoptis' Network Partners, enhancing their skill set to effectively assess and recruit top medical professionals. Furthermore, the team provides consultations tailored to local requirements, addressing specific challenges such as the implementation of applicant management systems and offering tailored interview guidelines. The team also offers guidance on developing effective employer branding strategies.

Beyond its internal recruitment services, Sanoptis has also secured contractual framework agreements with six leading agencies specializing in medical and doctoral recruitment, initially focusing on the key markets Germany and Switzerland. Plans are underway to extend similar agreements to other countries of operation.

| Time horizon | Scope |
|---|---|
| Ongoing (Long-term) | Sanoptis majority-owned Network Partners (unless explicitly highlighted otherwise) |

### Offering Competitive Employment Conditions

Sanoptis seeks to attract talented doctors by offering competitive employment conditions. By joining Sanoptis' Pan-European Network, doctors gain access to a community of senior professionals, offering younger doctors the opportunity to learn from and collaborate with well-respected ophthalmologists from across Europe. Further benefits include, but are not limited to:

- Competitive compensation packages
- Opportunities for physicians to take on entrepreneurial and leadership roles
- Regular working hours with flexible scheduling options
- Part-time opportunities to support a balance between family and career
- Streamlined documentation and administrative processes, supported by Sanoptis' services and digitalization initiatives

Each year, leading doctors from all Sanoptis Network Partners meet in-person for the Sanoptis Medical Board. This event provides a forum for doctors to exchange best practices, discuss the latest medical advancements, and share key insights from the past year. The lessons learned and innovations discussed are carried back to each practice or clinic, aiming to ensure that all doctors benefit from the shared knowledge and improvements in patient care.

Sanoptis is committed to providing an environment where doctors can thrive, innovate, and advance their careers in a supportive and collaborative atmosphere. Sanoptis consciously limits its involvement in daily operations to areas where it adds value, allowing doctors the freedom to exercise their professional judgment and focus on delivering the best possible care to their patients.

| Time horizon | Scope |
|---|---|
| Ongoing (long-term) | Sanoptis majority-owned Network Partners |

### Accrediting Network Partners as recognized Medical Training Institutions

61% of Sanoptis' Network Partners are accredited as medical training institutions, allowing assistant doctors who have completed their general medical education to specialize in the field of ophthalmology. Through these accredited programs, assistant doctors gain hands-on clinical experience and participate in structured, multi-year trainings that cover all areas of ophthalmology.

The application and accreditation process varies between states and countries. It typically involves a formal application to the relevant governing body, such as the State Medical Associations, along with documentation on training resources, availability of qualified supervisors, and proof of compliance with local training regulations. To support this process, Sanoptis leverages its Network by facilitating exchanges between accredited partners and those seeking accreditation, sharing best practices, lessons learned, and blueprints of successful training programs to guide them through the process.

Additionally, Sanoptis has organized a networking event at the 2024-DOG Congress in Berlin, specifically aimed at targeting assistant doctors. The goal of the event is to raise awareness of Sanoptis' attractiveness as an employer, highlighting the opportunities and benefits of joining the Network.

| Time horizon | Scope |
|---|---|
| Ongoing (long-term) | As outlined in the text above (61% of Sanoptis' Network Partners) |

## Description of scope of key action

As outlined above

## Time horizon under which key action is to be completed

As outlined above

## 7.4.2.4.3 Metrics and targets

### Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Net change in number of doctors employed in 2024: 26

### Disclosure of methodologies and significant assumptions behind metric

- **Methodology:** Number of doctors employed on December 31st, 2024, minus the number of doctors employed on January 1st, 2024, minus the number of doctors employed by acquisitions closed in 2024.
- **Assumptions:** No assumptions were made whilst calculating this metric.

### Type of external body other than assurance provider that provides validation

No external body other than the assurance provider has validated this metric.

### Targets related to entity-specific impacts, risks and opportunities.

In line with Sanoptis' ambition to further enhance and expand the central services provided to its network partners, Sanoptis has not yet established measurable targets for its doctor succession and recruitment framework. Sanoptis' acquisition-led growth strategy presents challenges in setting specific targets and baselines at this stage. Sanoptis will revisit this decision in the coming years.

### Description of processes through which effectiveness of policies and actions is tracked in relation to material sustainability-related impact, risk and opportunity

Sanoptis does not currently track the effectiveness of each individual action or policy in isolation. Instead, these are evaluated at the Network-Partner level using Key Performance Indicators (KPIs) that help determine whether adequate levels of doctoral staffing are being maintained. Determining the precise factors that lead a doctor to join the Sanoptis network is inherently complex, as it often results from a combination of multiple, intertwined reasons rather than a singular cause or action.

### Base year from which progress is measured

Not applicable, as currently no targets have been defined

## 7.4.3 Appendix III - Canyon

### 7.4.3.1 General Information

#### 7.4.3.1.1 Reporting scope and boundaries

**Basis for preparation of sustainability statement (consolidated or individual basis)**

Canyon's sustainability statement is consolidated and therefore applies to the entire GoForGold Holding GmbH.

**For consolidated sustainability statements: Scope of consolidation of consolidated sustainability statement is same as for financial statements**

In accordance with ESRS 1 §102 and ESRS 2 §5(b), Canyon confirms that the scope of consolidation of its consolidated sustainability statement is aligned with its consolidated financial statements.

**For consolidated sustainability statements: Indication of subsidiary undertakings included in consolidation that are exempted from individual or consolidated sustainability reporting**

No subsidiary of Canyon included in the consolidated sustainability statement is exempted from individual or consolidated sustainability reporting.

**Disclosure of extent to which sustainability statement covers upstream and downstream value chain**

Canyon's sustainability statement includes information on the material impacts, risks and opportunities connected with the undertaking through its direct and indirect business relationships in the upstream and/or downstream value chain.

Canyon established clear reporting boundaries for non-financial disclosures in line with the principles of relevance and materiality. These boundaries encompass all operations directly under Canyon's control, including manufacturing, distribution, and retail activities. Canyon includes critical aspects of the upstream and downstream value chain in the reporting framework. This ensures the key environmental and social impacts beyond immediate operations, such as those involving suppliers, third-party manufacturers, and logistics partners, are addressed.

The focus for value chain reporting relates to the topics identified as material by the Double Materiality Analysis. This analysis allows Canyon to concentrate on the most significant environmental and social issues as well as risks and opportunities identified along the lifecycle of products and services, ensuring that improvement efforts are prioritised where they can have the most impact.

Upstream, Canyon actively engages with suppliers to address material concerns related to carbon emissions, resource efficiency, labour conditions, and ethical sourcing of materials such as aluminium. Canyon's Human Rights Program is aligned with international standards like the United Nations Global Compact and OECD Guidelines for Multinational Enterprises and prioritises collaboration when addressing material topics, such as reducing the carbon footprint of materials and improving social standards in the supply chain.

Downstream, Canyon focuses on optimizing logistics networks to reduce emissions. By implementing measures that support a circular economy, the undertaking aims to reduce waste and enhance resource efficiency, in alignment with long-term sustainability goals.

**Option to omit specific piece of information corresponding to intellectual property, know-how or results of innovation has been used**

ESRS 1, §105 and §106 and ESRS 2 §5(d), specify that no disclosure must be provided by the reporting entity if it contains classified or sensitive information, even if such information is considered material. Also, when disclosing information about strategy, plans and actions, where a specific piece of information corresponding to intellectual property, know-how or the results of innovation is relevant to meet the objective of a Disclosure Requirement, the undertaking may nevertheless omit that specific piece of information under circumstances outlined in ESRS 1 §106. Canyon exercises safeguard clauses to protect commercially-sensitive information, intellectual property, or where disclosure could compromise ongoing contractual relationships if, in the duly justified opinion of the Board of Directors of Canyon, the disclosure of such information would be seriously prejudicial. In accordance with ESRS 1, §108, Canyon made every reasonable effort to ensure that, beyond the omission of classified or sensitive information, or of specific pieces of information corresponding to intellectual property, know-how, or the results of innovation, the overall relevance of the disclosure in question is not impaired.

## 7.4.3.1.2 Specific circumstances related to time horizons

### Medium- or long-term time horizons defined by ESRS 1 have been deviated from

*See Disclosure of definitions of medium- or long-term time horizons*

### Disclosure of definitions of medium- or long-term time horizons

In accordance with ESRS 1, §77, the short-term time horizon is aligned with the 12-month period adopted by Canyon for the reporting period or its financial statement.

In accordance with ESRS 1, §77, the medium-term time horizon is defined as the period ranging from the end of the short-term reporting period defined above up to 5 years.

In accordance with ESRS 1, §77, the long-term time horizon is defined as any period beyond 5 years.

### Disclosure of reasons for applying different definitions of time horizons

Not applicable as Canyon has not deviated from the medium- or long-term time horizons defined by ESRS 1, section 6.4.

## 7.4.3.1.3 Value chain estimation

### Metrics include value chain data estimated using indirect sources

*See Disclosure of metrics that include value chain data estimated using indirect sources*

### Disclosure of metrics that include value chain data estimated using indirect sources

To comprehensively assess the environmental impacts and social risks within the value chain, Canyon uses a combination of direct supplier data and estimations based on indirect data sources. For metrics not directly provided by suppliers, we rely on benchmark data from leading institutions, national and international databases, and sector-specific information. Metrics that include estimated value chain data encompass data disclosed in ESRS E1 and ESRS E5. The scope 3 calculation encompasses categories 1–7, 11, and 12, which are relevant to Canyon and reported accordingly. In certain instances, values were extrapolated or based on assumptions. Emission factors from the ecoinvent database are used to calculate emissions across all reported scope 3 categories. For category 2, additional monetary emission factors from the US EPA are used. Value chain estimations, which are used in scope 3 are also applicable for metrics for E5 incoming resources (See Description of the methods used to calculate the data and the key assumptions used). In order to determine the share of biological material in tyres and tubes, in particular natural rubber, the publication of the European tyre and rubber manufacturers' association is used.

### Description of basis for preparation of metrics that include value chain data estimated using indirect sources

Canyon's approach to metrics encompasses the inclusion of value chain data and combines direct data from suppliers with estimates from indirect sources. When suppliers cannot provide specific data, industry benchmarks, sector-specific emissions and resource coefficients, and data from authoritative global databases are used.

### Description of resulting level of accuracy of metrics that include value chain data estimated using indirect sources

Whilst Canyon strives for the highest level of data accuracy, metrics derived from indirect sources involve a degree of estimation and thus may not reach the precision of directly-sourced data. Based on the assessments, data accuracy ranges from high accuracy (for metrics largely based on direct supplier data), moderate accuracy (for metrics combining direct data with significant indirect estimation), to low accuracy (for metrics relying primarily on sector averages or generalised industry data).

### Description of planned actions to improve accuracy in future of metrics that include value chain data estimated using indirect sources

To enhance the accuracy of our value chain metrics, we are committed to expanding data collection efforts with our suppliers and investing in improved data integration systems. Planned actions include increasing the number of suppliers reporting direct emissions and resource usage data, implementing digital tools, and participating in industry collaborations aimed at standardising supply chain reporting.

## 7.4.3.1.4 Sources of estimation and outcome uncertainty

### Disclosure of quantitative metrics and monetary amounts disclosed that are subject to high level of measurement uncertainty

Some of the quantitative measures and monetary amounts disclosed in Canyon's sustainability report are subject to a degree of uncertainty as they are based on estimation techniques such as extrapolation and indirect data sources. The details are disclosed in the respective chapter alongside the topical ESRS standards.

### Disclosure of sources of measurement uncertainty

The primary sources of measurement uncertainty in Canyon disclosures stem from three main areas: (1) the lack of direct data from certain suppliers, which requires the use of industry averages and third-party benchmarks; (2) regional variability in data accuracy, particularly for environmental and social metrics in high-risk or under-reported regions; and (3) the inherent variability in estimation models and assumptions used for complex calculations, such as greenhouse gas emissions.

### Disclosure of assumptions, approximations and judgements made in measurement

In deriving certain metrics, Canyon applied assumptions, approximations, and professional judgements to achieve a balance between completeness and data precision. For instance, where direct emissions data from suppliers was unavailable, Canyon approximated emissions based on similar industry profiles, adjusting for regional production factors. Judgments were also made in selecting the most applicable benchmark data for indirect metrics, prioritising sources that best reflect suppliers' geographic and operational contexts. Further information on the key estimates, judgements and assumptions are outlined in the specific chapter. Comprehensive information regarding each scope 3 category can be found in “Disclosure of the reporting boundaries and calculation methods used to estimate Scope 3 greenhouse gas emissions”. Furthermore, since the data used for the Corporate Carbon Footprint calculation also informs key metrics on incoming resources, the related assumptions and sources are detailed in “Description of the methods used to calculate the data and the key assumptions used”. In order to determine the share of biological material in tyres and tubes, in particular natural rubber, the publication of the European tyre and rubber manufacturers' association is used.

## 7.4.3.1.5 Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

### Disclosure of other legislation or generally accepted sustainability reporting standards and frameworks based on which information has been included in sustainability statement

Canyon considered the following legislation or generally accepted sustainability reporting standards and frameworks:

- disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation);
- the CDP integrated questionnaire for all sectors was considered when drafting topical standard ESRS E1;
- the French AGEC law against wastage and for circular economy (2020) was considered when drafting topical standard ESRS 5;
- the German Act on Corporate Due Diligence Obligations in Supply Chains (2021) was considered when drafting ESRS S2 and ESRS S1;
- the UK Modern Slavery Act (2015) was considered when drafting ESRS S2;
- the Australian Modern Slavery Act (2018) was considered when drafting ESRS S2;
- the Canadian Fighting Against Forced Labour in the Supply Chain Act (2023) was considered when drafting ESRS S2;
- the California Transparency in Supply Chains Act (2010) was considered when drafting ESRS S2;
- the Norwegian Transparency Act (2022) was considered when drafting ESRS S2;
- the Occupational Safety and Health Act (1996) was considered in ESRS S1, specifically referencing §6 of the legislation.

### Disclosure of reference to paragraphs of standard or framework applied

The following references to paragraphs of standards or frameworks are parts of the sustainability report.

- Occupational Safety and Health Act (1996) was considered in ESRS S1, specifically referencing §6 of the legislation.
- Article 72 of the AGEC Law and is referenced in ESRS E5.

### List of DRs or DPs mandated by a Disclosure Requirement

*See Topics (E4, S1, S2, S3, S4) have been assessed to be material*

## 7.4.3.1.6 Use of phase-in provisions

### Topics (E4, S1, S2, S3, S4) have been assessed to be material

DRs or DPs mandated by a Disclosure Requirement:

The information required under paragraph ESRS S1-6 50a and f is cross-referenced in the appendix to the financial statement under "F Other Disclosures / Average Number of Employees (FTE)". All phase-in provisions applicable for Canyon were used.

### List of sustainability matters assessed to be material (phase-in)

N/A

### Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)

N/A

### Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets

N/A

### Description of policies related to sustainability matters assessed to be material (phase-in)

N/A

### Disclosure of metrics related to sustainability matters assessed to be material (phase-in)

N/A

## 7.4.3.1.7 Governance structure and composition

### Information about representation of employees and other workers

Employee representatives were not included in any of the bodies as of 31 December 2024.

### Information about member's experience relevant to sectors, products and geographic locations of undertaking

All members of Canyon's governing body have an international track record in leadership and management. Their diverse expertise at a global level relates to different industries, which reflect the spectrum of Canyon's operations and offering of products and services. Members hold positions such as CFO of Zevia, VP and GM at Google, Founder of Canyon, Chairman of CNP and founder of Carlyle Europe.

### Board independence ratio

| Type of board member | Number | Percentage |
|---|---|---|
| Independent | 7.00 | 80.00 |
| Executive | 2.00 | 20.00 |

### Board diversity, by gender

| Gender | Number of board members | Percentage of the board |
|---|---|---|
| Women | 0.00 | 0.00 |
| Men | 9.00 | 100.00 |

## 7.4.3.1.8 Roles and responsibilities of administrative, management and supervisory bodies

### Information about identity of administrative, management and supervisory bodies or individual(s) within a body responsible for oversight of impacts, risks and opportunities

| Name and current employer | Jean-Pierre Millet (Chairman CNP) | Michael Bredal (GBL) | Jerry Dischler (VP and GM Google) | Jonathan Rubinstein (GBL) | Roman Arnold (Founder & Shareholder Canyon) | Karim Bohn (CFO Canyon) | Nicolas de Ros Wallace (CEO Canyon) | Simon Zenner (GBL) | Girish Satya (TSG Principal) |
|---|---|---|---|---|---|---|---|---|---|
| Executive/ Non-Executive member | Non-Executive | Non-Executive | Non-Executive | Non-Executive | Non-Executive | Executive | Executive | Non-Executive | Non-Executive |
| Advisory Board Member | Yes | Yes | Yes | P | Yes | No | No | P | Yes |
| Audit Committee Member | No | Yes | No | No | No | P | P | Yes | No |
| Board of Directors Member | No | No | No | No | No | Yes | Yes | No | No |

P=Permanent Guest

### Disclosure on how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies

Canyon recognises the importance of a governance structure, and the enforcement of rules and regulations, and has assigned clear roles and responsibilities to the respective governing bodies. Canyon´s governance structure is composed of an Advisory Board, an Audit Committee and the Board of Directors. (For further information, please refer to Governance information: Business Conduct).

The roles and responsibilities of the Audit Committee are formalised in the "Regulations of the Audit Committee of The Board of Directors". The primary function of the Audit Committee is to assist the Board of Directors with its responsibility of overseeing the integrity of the company's financial statements, compliance with legal and regulatory requirements, the appointment, the qualifications, independence and performance of the company's independent auditors and internal audit staff. The Committee shall also monitor the company's risk management and safety programs, including those related to environmental, social, financial and governance topics. The Committee's primary responsibility is oversight, including the oversight of the company's non-financial reporting, including impacts, risks and opportunities. The functions of the Committee are exclusively of an advisory nature. The Committee reports on a regular basis to the Advisory Board. For sustainability matters, the members also cooperate with external sustainability experts and consultants, depending on the subject.

The role of the Advisory Board is formalised in the "Shareholders Agreement". The primary function of the Advisory Board is to oversee and advise on the company's strategic direction. This includes ESG topics; the responsibility for the strategic direction, approval, and review of the ESG-related codes and policies has been assigned to the Advisory Board.

The Board of Directors is composed of two General Manager positions, held by the Chief Executive Officer (CEO) and the Chief Financial Officer (CFO), who share the responsibility for executive decisions, driving the direction of the company, supervising other executives, and overseeing growth and strategy plans. The Global Director ESG regularly reports to the Board of Directors on ESG matters relevant to Canyon. In addition, depending on the subject, the Board of Directors seeks advice from internal ESG experts and external consultants as needed. Internal key experts include but are not limited to the Environmental Manager, Chemical Compliance Engineer, Human Rights Manager, ESG Disclosure & Transformation Manager and the Team Manager Health and Safety.

The ESG department at Canyon was created in 2021 with the Global Director ESG and comprised a total of 5 members by the end of the reporting year, including an Environmental Manager, a Human Rights Manager, a Junior Human Rights Manager, an ESG Disclosure & Transformation Manager and a Chemical Compliance Engineer. The department is allocated in the Chief Group Development Officer (CGDO) area due to the holistic nature of the topic, and to guarantee a process-oriented integration of ESG topics on a global company level, as well as direct access to the Board of Directors. Increasing the maturity of the ESG department and embedding ESG processes at a global company level is a key function of the CGDO. The ESG department is also assuming the function of centralizing ESG related information covering risks, impacts and opportunities, which is then shared with the Audit Committee members at least annually and ad hoc if required, followed by above outlined information cascading through the governance structure.

## Description of management's role in governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities

*See Disclosure on how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies*
*See Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them*
*See Disclosure of how administrative, management and supervisory bodies consider impacts, risks and opportunities when overseeing strategy, decisions on major transactions and risk management process*

## Description of how oversight is exercised over management-level position or committee to which management's role is delegated to

*See Disclosure on how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies*
*See Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them*

## Information about reporting lines to administrative, management and supervisory bodies

*See Disclosure on how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies*
*See Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them*
*See Disclosure of how administrative, management and supervisory bodies consider impacts, risks and opportunities when overseeing strategy, decisions on major transactions and risk management process*

## Disclosure of how dedicated controls and procedures are integrated with other internal functions

The sustainability statement was written under the supervision of the ESG department with contributions from internal experts. The statement was reviewed and approved by the Chief Financial Officer (CFO). The Audit Committee is responsible for the oversight of the sustainability statement.

## Disclosure of how administrative, management and supervisory bodies and senior executive management oversee setting of targets related to material impacts, risks and opportunities and how progress towards them is monitored

*See Disclosure on how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies*
*See Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them*

## 7.4.3.1.9 Skills and expertise to oversee sustainability matters

### Disclosure of how administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee sustainability matters

The administrative, management, and supervisory bodies of Canyon, depending on the sustainability topic, seek advice from internal ESG experts and external consultants as needed. Internal key experts include, but are not limited to, the Environmental Manager, Chemical Compliance Engineer, Human Rights Manager, ESG Disclosure & Transformation Manager, and the Team Manager for Health and Safety. The sustainability-related skillsets of members of the bodies are continuously enhanced through the implementation of the Canyon governance structure, where internal ESG experts share knowledge and provide updates on new developments, with a particular, but not exclusive, focus on material topics. Furthermore, ongoing exchanges between members of the bodies foster a culture of knowledge sharing, including on sustainability matters.

### Information about sustainability-related expertise that bodies either directly possess or can leverage

*See Disclosure on how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies*

### Disclosure of how sustainability-related skills and expertise relate to material impacts, risks and opportunities

*See Disclosure on how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies*

## 7.4.3.1.10 Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies

### Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them

The Audit Committee and the Board of Directors are informed at least once per year about material impacts, risks and opportunities, implementation of due diligence, and the results and effectiveness of policies, actions, metrics and targets by the Global Director ESG. If new impacts, risks and opportunities arise, the Board of Directors is informed accordingly. The Audit Committee cascades relevant information to the Supervisory Board for consideration.

### Disclosure of how administrative, management and supervisory bodies consider impacts, risks and opportunities when overseeing strategy, decisions on major transactions and risk management process

The Audit Committee oversees the risks inherent to Canyon on a yearly basis, including an IRO-specific risk assessment, and advises the Canyon Board of Directors accordingly. IRO (Impact Risk Opportunity) -specific matters are brought to the attention of the Supervisory Board by the Audit Committee and are considered within the advisory function of the board. The Board of Directors devotes a significant part of its activity to the development of Canyon's company strategy. ESG, specifically the consideration of material IROs, is integrated in the corporate strategy development process. Canyon's governing bodies have considered the trade-offs associated with impacts, risks and opportunities when overseeing strategy and taking strategic decisions, when deciding on major transactions, and during risk-management processes.

### Disclosure of list of material impacts, risks and opportunities addressed by administrative, management and supervisory bodies or their relevant committees

Following a discussion about identified ESG risks within a company-wide holistic risk management approach in 2023, the Audit Committee and the Board of Directors was informed about identified material IROs in 2024. The Human Rights Due Diligence Process was presented and discussed in the Audit Committee and the Board of Directors.

## 7.4.3.1.11 Integration of sustainability-related performance in incentive schemes

### Description of key characteristics of incentive schemes

Canyon has not implemented incentive schemes and remuneration policies linked to sustainability matters for members of the undertaking's administrative, management and supervisory bodies. However, Canyon recognises the importance of such schemes and aims to integrate such incentives into existing schemes within a mid-term time horizon.

### Description of specific sustainability-related targets and (or) impacts used to assess performance of members of administrative, management and supervisory bodies

*See Description of key characteristics of incentive schemes*

### Percentage of variable remuneration dependent on sustainability-related targets and (or) impacts

0.00 %

### Description of level in undertaking at which terms of incentive schemes are approved and updated

*See Description of key characteristics of incentive schemes*

## 7.4.3.1.12 Information provided in sustainability statement about due diligence process

### Disclosure of mapping of information provided in sustainability statement about due diligence process

Core elements of Canyon's due diligence, for impacts on people and the environment, are disclosed in the sustainability statement, as set out below.

1. Embedding due diligence in governance, strategy and business model: Information provided to, and sustainability matters addressed by Canyon's governance bodies (ESRS 2 GOV-2); material IROs and their interaction with strategy and business model (ESRS 2 SBM-3);
2. Engaging with affected stakeholders: Contribution to stakeholders' engagement is outlined in ESRS 2 GOV-2, ESRS 2 SBM-2, ESRS 2 IRO-1, ESRS 2 MDR-P and related topical ESRS integration;
3. Identifying and assessing adverse impacts: ESRS 2 IRO-1, ESRS 2 SBM-3;
4. Taking actions to address those adverse impacts: (including transition plan) through which the IROs are addressed (ESRS 2 MDR-A; and related topical ESRS integration;
5. Tracking the effectiveness of these efforts and communicating: ESRS 2 MDR-M; ESRS 2 MDR-T and topical ESRS regarding metrics and targets.

| Core elements of due diligence | Sections in the sustainability statements |
|---|---|
| a) Embedding due diligence in governance, strategy and business model | General |
| b) Engaging with affected stakeholders in all key steps of the due diligence | General<br>Social<br>Governance |
| c) Identifying and assessing adverse impacts | Social<br>Governance |
| d) Taking actions to address those adverse impacts | Social<br>Governance |
| e) Tracking the effectiveness of these efforts and communicating | Social<br>Governance |

## 7.4.3.1.13 Risk management and internal controls over sustainability reporting

### Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting

Risks related to the internal control processes over sustainability reporting could arise from completeness and integrity of the data, accuracy of estimation results, availability of upstream and/or downstream value chain data, and the timing of the availability of the information.

The risk assessment process related to the internal control process over sustainability reporting includes the identification of risks, the analysis and evaluation of identified risks, implementation of mitigation measures and monitoring.

During the identification of material topics through the Double Materiality Assessment, risks were identified and discussed internally. A deeper understanding of key risks was developed throughout the reporting process and risk were prioritised according to impact and likelihood. Canyon identified the following key risks and implemented respective mitigation measures.

- **Accuracy of estimates:** mitigation measures include plausibility checks and four-eye principle.
- **Availability of data:** mitigation efforts include deeper supply chain mapping and increased efforts in data collection along the supply chain, as well as awareness raising amongst supply chain partners concerning the importance of data availability.
- **Timely delivery of information:** mitigation through awareness raising and continuous support for data collection provided by the ESG department.

Findings of the risk assessment and internal controls are integrated into relevant internal functions and processes as soon as they arise by implementing the outlined mitigation measures.

The sustainability statement was written under the supervision of the ESG department with contributions from internal experts. The statement was reviewed and approved by the Chief Financial Officer (CFO). The Audit Committee is responsible for the oversight of the sustainability report.

### Description of main risks identified and their mitigation strategies

*See Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting*

### Description of how findings of risk assessment and internal controls as regards sustainability reporting process have been integrated into relevant internal functions and processes

*See Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting*

### Description of periodic reporting of findings of risk assessment and internal controls to administrative, management and supervisory bodies

The administrative, management and supervisory bodies are informed about risks related to the internal control processes over sustainability reporting by adhering to the Canyon governance structure outlined in this standard.

## 7.4.3.1.14 About the company's activities

### Description of business model and value chain

Canyon is a Direct-to-Consumer manufacturer of premium bicycles with key customers comprising athletes, ambassadors, and day-to-day bike riders. The company offers a variety of bikes for various target groups depending on their interests and preferences. The bikes are categorized into four segments: Road, Gravel, Mountain Bikes, and Urban.

Canyon is headquartered in Koblenz, Germany, with subsidiaries and external partners around the globe. The Canyon subsidiaries perform local market management and provide customer-focused services. Product research and development, engineering, supply chain management, purchasing and other administrative as well as supporting functions are mainly based in Germany. Canyon products are sold in over 50 countries worldwide.

A significant proportion of Canyon bikes are assembled in the factory in Koblenz. Further assembly partners are in Portugal, Czech Republic, Cambodia, and Taiwan. Components for Canyon bicycles and accessories are sourced through local agents and a global partner network of independent brands and suppliers, with production locations stretching across 30 countries.

Further details about Canyon's value chain are disclosed in the following section of this report: Description of main features of upstream and downstream value chain and undertakings position in value chain.

### Strategic approach

Canyon's mission "Inspire to ride" drives the strategic approach of the undertaking. Responsible business practices are embedded in the global company strategy.

Achieving set goals and embracing responsibility are deeply integrated into Canyon's business strategy through the systematic assessment, prioritization, mitigation, and monitoring of material impacts, risks, and opportunities (IROs).

## Description of inputs and approach to gathering, developing and securing inputs

### Key inputs to short-term value creation and long-term business success

The successful implementation of Canyon's strategic pillars is fundamentally linked to achieving excellence in operations and digital transformation, fostering deep customer engagement, and upholding core values with a strong sense of purpose and transparency. Central to this approach are the development and empowerment of Canyon's employees, close and collaborative partnerships throughout the value chain, and a robust combination of technical expertise, innovative research, and development. These elements collectively serve as the essential drivers that enable the company to realise its strategic goals.

## Description of significant groups of products and (or) services offered

*See Description of business model and value chain*

## Description of significant markets and (or) customer groups served

*See Description of business model and value chain*

## Description of outputs and outcomes in terms of current and expected benefits for customers, investors and other stakeholders

### Short-term value creation

Canyon's innovative products are developed with a deep understanding of diverse customer needs, including those related to sustainability. Employees are recognized as critical contributors to the company's success, and benefit from career advancement and personal growth opportunities. The global supplier network gains access to knowledge exchange and training programs that foster responsible business practices and drive innovation. Investors and shareholders benefit from stable risk-adjusted returns.

### Long-term value creation

Canyon's commitment to continuous learning and innovation positions the company to adapt to evolving customer expectations while embedding responsible business practices within its strategy. Employees enjoy the advantages of economic growth and a strong organisational emphasis on lifelong learning. Through long-term partnerships, Canyon advances responsible business practices, supports the transition to low-carbon and climate-resilient economies, and promotes respect for human rights. Investors and shareholders benefit from sustained, profitable growth underpinned by financial and operational resilience.

## Description of main features of upstream and downstream value chain and undertakings position in value chain

Canyon's value chain stretches from raw material extraction, processing of extracted materials and their transformation into products, and assembly of components into bicycles to sales and use of finished products. Transport of materials, goods and finished products from one production step to the next, as well as end customers completes the value chain setup.

The upstream value chain is a network of many actors based mainly in Asia, and also in Europe and the USA. Canyon has long-term business relationships with most of its upstream suppliers, and activities in Asia have been supported by an agent based in Taiwan for many years. Canyon purchases ready-made components and Canyon-engineered parts from the supplier network.

Canyon's own operations include the design and development of bicycles, assembly, warehousing and packaging of commercial goods, and sales to end customers.

Sales and distribution through logistics partners, the use-phase and the end-of-life phase of products are key elements of the downstream value chain.

## Total Revenue/Gross Revenue

784,057,390.11 EUR

## 7.4.3.1.15 Sustainability-related goals

### Description of sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders

As a means of transport, bicycles can play an important role in transitioning to a low carbon economy and supporting a healthy lifestyle. However, the production of bicycles has impacts on the environment and people as outlined in this report. One of Canyon's key sustainability goals is to reduce overall greenhouse gas emissions in line with a science-based targets approach. In 2024, Canyon's near- and long-term greenhouse gas reduction targets were approved by the science-based targets initiative and the company started to implement reduction measures to reach the set targets. Progress against targets is monitored on a yearly basis and communicated through the CDP. The last known rating for the CDP was a B, for the 2023 report.

Actions are implemented to not only mitigate impacts, but also to manage associated risks.

The reduction of greenhouse gas emissions is also connected to the use of resources and a circular economy approach.

To address impacts on people and respect for human rights, Canyon follows a human rights due diligence process that is aligned with requirements from regulators and international standards and frameworks. Yearly and ad-hoc risk assessments, supplier monitoring, mitigation and remediation of potential and actual impacts are key elements of this approach, and complement Canyon's sourcing strategy. The focus of this approach is connected to production locations that have been identified as high-risk locations due to, for example, their geographical location, or due to the commodities they source. Workers in the value chain as well as Canyon's own workforce are all covered by this approach.

Data protection is crucial for data in general, but in a direct-to-consumer business model also specifically concerns customer data. Canyon has implemented relevant policies and safeguards. Due to continuous advancements connected to topics of internet security, Canyon is continuously improving its safeguards and processes to protect critical data.

Further details about goals that were set in relation to identified material topics are disclosed in the relevant topical ESRS topical standards.

### Disclosure of assessment of current significant products and (or) services, and significant markets and customer groups, in relation to sustainability-related goals

The sustainability-related goals outlined are not tied to a specific product, service, customer group, or market. Instead, they reflect a holistic approach that is integrated into Canyon's overall business model.

### Disclosure of elements of strategy that relate to or impact sustainability matters

*See Description of sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders*

## 7.4.3.1.16 Interests and views of stakeholders

### Description of stakeholder engagement

Canyon engages with its stakeholders across various levels of the organisation. Through regular and structured dialogue, the company seeks to understand stakeholder perspectives, concerns, and expectations related to financial performance and operational strategies. This interaction is important for informing business decisions and initiatives, and aligns with stakeholder interests.

Insights gathered from these discussions are incorporated into the due diligence process and double materiality assessment, helping to shape an understanding of how stakeholder views relate to Canyon's strategy and business model.

Feedback from stakeholders is communicated as important matters arise to the Board of Directors or through the yearly IRO information to the Canyon governing bodies. This ensures that the views and interests of stakeholders are considered in relation to Canyon's sustainability-related impacts, facilitating informed decision-making at all management levels.

Canyon's stakeholder management process is decentralised and outlined in the following table:

| Stakeholder | How engagement is organized | Purpose of stakeholder engagement | Examples of outcomes from the engagements |
|---|---|---|---|
| **Advisory Board** | – Quarterly meetings<br>– Internal reporting structure as per governance policies | – Leverage Advisory Boards members expertise and insights to guide the strategic decision-making process;<br>– Input helps us stay ahead of market trends, adopt new technologies, and enhance our product offerings (source of innovative ideas and best practices from various sectors);<br>– Identify potential risks and challenges;<br>– Evaluate our organizational performance and progress toward strategic goals;<br>– Maintain a long-term perspective, ensuring that our strategies align with our vision for the future | – New product ideas and innovative solutions;<br>– Proactive strategies that mitigate risks and enhance the company's resilience;<br>– Enhanced brand reputation as a thought leader in the cycling industry;<br>– Engagement with other stakeholders, including investors |
| **Authorities and regulators** | – Regular reporting on compliance with environmental regulations<br>– Active membership in bicycle industry associations for regulatory advocacy | – Ensure compliance with safety and environmental standards;<br>– Maintain transparency in production practices | – Adapted production processes to align with updated regulatory requirements;<br>– Enhanced internal practices based on regulatory feedback |
| **Customers** | – Direct communication channels<br>– Feedback mechanisms (E.g., surveys, reviews, feedback forms, etc.)<br>– Community engagement and events<br>– Customer service and product development involvement<br>– Social media engagement | – See S4 Customers & End-Users | – Product improvements |
| **Employees** | – Internal communication trough various channels (Employee Portal, newsletters, etc.)<br>– Leadership site visits and town hall meetings<br>– Personal development dialogues<br>– Surveys and workplace assessments<br>– Internal reporting structures | – Enhance employee satisfaction by actively listening to and involving employees in decision-making processes;<br>– Improve retention and loyalty of employees;<br>– Drive performance and productivity;<br>– Focus on the well-being of our employees, addressing their needs and concerns;<br>– Reinforcing a culture of respect, inclusivity, and collaboration | – Internal policy updates;<br>– Increased transparency, ensuring that employees feel informed and engaged with company decisions and policies;<br>– Global initiatives among the workforce |
| **Financial institutions** | Quarterly financial reporting<br>– Annual meetings with banks and lenders to discuss financial performance and growth plans<br>– Ad-hoc communication if needed (E.g., High impact on deviations to budget) | – Secure access to capital for expansion and operational needs;<br>– Maintain favorable credit terms and conditions;<br>– Ensure transparency regarding financial stability and growth prospects;<br>– Build strong, long-term relationships with key financial partners | – Adjusted financing structures to align with market conditions;<br>– Secured credit lines to support growth and operational stability;<br>– Improved understanding of market expectations for financial performance |
| **Industry Associations** | – Membership and networking<br>– Workshops and knowledge sharing | – Participate in the development and promotion of industry standards and best practices;<br>– Valuable networking opportunities with other companies, stakeholders, and leaders;<br>– Gain insights into emerging trends, market developments, and regulatory changes;<br>– Share of knowledge and best practices among members of industry associations | – Enhancing the company's network and creating opportunities for joint initiatives;<br>– Raise the profile of Canyon within the industry, attracting attention from media, consumers, and potential collaborators; |

| Stakeholder | How engagement is organized | Purpose of stakeholder engagement | Examples of outcomes from the engagements |
|---|---|---|---|
| **Investors** | – Ad-hoc Investor calls, questionnaires and emails<br>– Periodic investor updates (E.g., Liquidity, hedging, etc.)<br>– Quarterly investor meetings (Board Meetings) | – Foster a relationship based on trust and transparency by providing regular updates on our financial performance, strategic initiatives, and operational developments;<br>– Gather valuable insights and perspectives that can influence our strategic decision-making;<br>– Communicate our commitment to sustainability and corporate social responsibility | – Alignment on supporting growth initiatives and expansion projects;<br>– Promote a stronger emphasis on sustainability and environmental, social, and governance (ESG) practices |
| **NGOs** | – Partnerships with selected NGOs<br>– Joint projects and initiatives<br>– Capacity building, sponsorship and support | – Raise awareness about important social and environmental issues within the cycling community and beyond;<br>– Development of long-term partnerships based on shared values and goals;<br>– Enhance brand reputation as a socially responsible company;<br>– Create opportunities for our employees to engage in volunteer activities | – Access to specialized knowledge and resources to implement effective programs and initiatives that address social and environmental challenges;<br>– Increased employee engagement trough volunteer programs;<br>– Innovative sustainability initiatives that reduce the company's ecological footprint and promote eco-friendly practices |
| **Suppliers** | – Supplier due diligence<br>– Human rights and on-site assessments<br>– Supplier days | – Establish strong partnerships that ensure the consistent quality and reliability of our materials and components;<br>– Exchange of ideas and innovations that can enhance our product offerings;<br>– Promote sustainable practices throughout our supply chain;<br>– Ensure that they adhere to our ethical standards and compliance requirements | – Supplier Code of Conduct;<br>– Strong relationship that ensures a more reliable supply chain and reducing the risk of disruptions in the procurement of materials and components;<br>– Improved quality standards for materials, leading to better overall product quality and customer satisfaction |
| **Unions** | – Meetings<br>– Collective bargaining process<br>– Joint committees with union representatives | – Ensure that employees' voices and concerns are represented in discussions with management;<br>– Address and resolve workplace conflicts and grievances;<br>– Promote a culture of engagement and participation among employees;<br>– Facilitate the collective bargaining process | – Collective bargaining processes, resulting in fair wages, benefits, and working conditions that reflect the needs and expectations of employees;<br>– Compliance with labor laws and regulations, reducing the risk of legal issues and fostering a fair workplace; |
| Work Councils | – Regular meetings and joint committees<br>– Annual reviews and reports | – Ensure that the interests and concerns of employees are represented in decision-making processes;<br>– Collaborate on the development and implementation of workplace policies and practices;<br>– Develop initiatives focused on health, safety, and work-life balance | – Development of workplace policies that reflect employee needs and perspectives (E.g., works agreements);<br>– Interests and concerns are effectively communicated to management; |

## Description of key stakeholders

*See Description of stakeholder engagement*

## Description of categories of stakeholders for which engagement occurs

*See Description of stakeholder engagement*

## Description of how stakeholder engagement is organised

*See Description of stakeholder engagement*

## Description of purpose of stakeholder engagement

*See Description of stakeholder engagement*

## Description of how outcome of stakeholder engagement is taken into account

*See Description of stakeholder engagement*

### Description of understanding of interests and views of key stakeholders as they relate to undertaking's strategy and business model

*See Description of stakeholder engagement*

### Description of how administrative, management and supervisory bodies are informed about views and interests of affected stakeholders with regard to sustainability-related impacts

*See Description of stakeholder engagement*

## 7.4.3.1.17 Material impacts, risks and opportunities and their interaction with strategy and business model

### Description of material impacts resulting from materiality assessment

The undertaking discloses the descriptive information required by SBM-3 §46 alongside the disclosures provided under the corresponding topical ESRS in accordance with ESRS 2 SBM-3 §49 with the below statement of its material impacts, risks and opportunities, alongside its disclosures prepared under this chapter of ESRS 2.

The following impacts were assessed to be material in Canyon's 2024 materiality assessment (For further information, please refer to Description of the process to identify and assess material impacts, risks and opportunities).

See table below:

| Impact ID | Description | Allocation in the value chain | Time horizon | Impact category | Allocated material topic |
|---|---|---|---|---|---|
| 1 | Contribution to climate change, with the most significant share of greenhouse gas emissions allocated in Scope 3 (for example driven by production at factories of suppliers, on-site combustion of fossil fuels, transportation of products, purchase of raw materials and fuels). | The main impact is allocated in the upstream value chain and occurs at production locations of direct suppliers and indirect suppliers in the deeper value chain. | Not applicable | Actual, negative | E1 Climate Change |
| 2 | Waste is created by materials that cannot be recycled, or which might not be properly disposed. | The main impact is allocated along the whole value chain (upstream, downstream and own operations) during production of bicycles a supplier sited and can also materialize in the end-of-life phase. | Not applicable | Actual, negative | E5 Waste |
| 3 | Increase in non-recyclable waste mainly during production and the end-of-life phase. | The impact is allocated along the whole value chain along the whole value chain during production of bicycles a supplier sited and can also materialize in the end-of-life phase. | Not applicable | Actual, negative | E5 Waste and Resources |
| 4 | Consumption of primary resources for bicycle production. | The impact is allocated in the upstream value chain at production sites of direct business partners and indirect suppliers. | Not applicable | Actual, negative | E5 Resources |
| 5 | Support a circular economy through e.g. the use of more recycled materials in packaging and therefore less use of primary resources. | The impact is allocated in the upstream value chain at direct business partners. | Short-term | Potential, positive | E5 Resources |
| 6 | Protecting mental health of employees through Canyons mental health program with Fürstenberg Institute GmbH, which could influence the wellbeing of employees. | The impact is allocated in own operations. | Not applicable | Actual, positive | S1 Health & Safety |
| 7 | Occupational health and safety impacts in production locations can influence workers' health. (Human Rights) | The impact is allocated along the whole value chain at direct business partners and potentially in the deeper value chain have been identified. | Short-term (potential impact) | Actual (direct business partners) and potential (deeper value chain), negative | S2 Health & Safety |
| 8 | Regular working hours and overtime requirements that are not met in production locations can have an impact on workers' health and safety. (Human Rights) | The impact is allocated in the upstream value chain at direct business partners and could potentially materialize in the deeper value chain. | Short-term (potential impact) | Actual (direct business partners) and potential (deeper value chain), negative | S2 Working Time |

| Impact ID | Description | Allocation in the value chain | Time horizon | Impact category | Allocated material topic |
|---|---|---|---|---|---|
| 9 | Forced and child labour. (Human Rights) | The impact is allocated in the upstream value chain and can potentially occur in the deeper value chain. | Short-term | Potential, negative | S2 Forced Labour and Child Labour |
| 10 | Modern slavery indicators were identified, such as recruitment fees, whilst no actual incident of modern slavery was identified. (Human Rights) | The impact is allocated in the upstream value chain at direct business partners. | Not applicable | Actual, negative | S2 Forced Labour |
| 11 | Violation of customers rights due to the potential loss of personal data in a cyber incident, which could impact customer trust and loyalty. | The impact is allocated in own operations/ downstream value chain and relates to Canyons DTC business model and strategy. | Short-term | Potential, negative | S4 Consumers Information |
| 12 | Enabled customers to be less dependent on workshops by offering qualitative information for assembly, maintenance and other topics. | The impact is allocated in the downstream value chain and relates to Canyons DTC business model and strategy. | Not applicable | Actual, positive | S4 Consumers Information |
| 13 | Offer a better customer service through traceability of information on each specific part on each customer's bicycle. | The impact is allocated in the downstream value chain and relates to Canyon's DTC business model and strategy. | Not applicable | Actual, positive | S4 Consumers Information |
| 14 | Riding a bike improves the health of the cyclist. | The impact is allocated in the downstream value chain and relets to Canyon's core business model and activity. | Not applicable | Actual, positive | S4 Consumers Safety |
| 15 | Potential whistleblowers could have a positive impact as they play a critical role in exposing wrongdoing in an organisation. | The impact is allocated along the whole value chain relates to Canyon's own activities but also to impacts allocated at sites of business partners and the deeper value chain. | Short-term | Potential, positive | G1 Whistleblower |

## Description of material risks and opportunities resulting from materiality assessment

The undertaking discloses the descriptive information required by SBM-3 §46 alongside the disclosures provided under the corresponding topical ESRS in accordance with ESRS 2 SBM-3 §49 with the below statement of its material impacts, risks and opportunities, alongside its disclosures prepared under this chapter of ESRS 2.

The following risks were assessed to be material from a financial point of view in Canyon's 2024 materiality assessment (For further information, please refer to Description of the process to identify and assess material impacts, risks and opportunities).

See table below:

| Risk ID | Description | Allocation in the value chain | Time horizon | Risk category | Allocated material topic |
|---|---|---|---|---|---|
| 1 | Increased cost of raw materials due to transition to lower greenhouse gas emissions technology and products. | n/a | Medium-term | Transitional risk | E1 Climate Change |
| 2 | Higher production costs due to rising raw material costs due to a cascading cost effect from mining. | n/a | Medium-term | Transitional risk | E5 Resources |

## Disclosure of current and anticipated effects of material impacts, risks and opportunities on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Canyon acknowledges the importance of adjusting its business model, value chain, strategy and decision-making processes to mitigate material impacts and risks and to seize opportunities. The company started to focus on the importance of sustainability matters at the end of 2021 by founding the ESG department, which serves as a knowledge hub and advisor for different Canyon departments, as well as the governing bodies of the company. Today, the department has six employees with a variety of expertise, and supports the integration of sustainability matters into the overall company strategy. As outlined in this report, Canyon has already integrated sustainability into its overall strategy to address material topics.

### Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment

*See Description of material impacts resulting from materiality assessment*

### Disclosure of how impacts originate from or are connected to strategy and business model

*See Description of material impacts resulting from materiality assessment*

### Disclosure of reasonably expected time horizons of impacts

*See Description of material impacts resulting from materiality assessment*

### Description of nature of activities or business relationships through which undertaking is involved with material impacts

*See Description of material impacts resulting from materiality assessment*

### Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows and material risks and opportunities for which there is significant risk of material adjustment within next annual reporting period to carrying amounts of assets and liabilities reported in related financial statements

Because identified material risks have a mid-term time horizon, and mitigation measures are being assessed and implemented, Canyon does not expect any short-term financial effects of material risks and opportunities to its financial position, financial performance and cash flows. No significant risk of material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities were identified and are thus not expected to be reported in related financial statements.

### Information about resilience of strategy and business model regarding capacity to address material impacts and risks and to take advantage of material opportunities

Canyon's strategy responds to identified IROs with mitigation measures driven by actions and targets (For further information, please refer to topical standards E1, E5, S1, S2, S4, and G1). Sustainability matters are embedded in the company strategy and addressed through potential evolutions of the current business model, in-depth due diligence processes, and an organisation that can anticipate material changes to the operational environment. As a learning organisation, focused on innovation, Canyon is working continuously and safeguarding its resilience in a fast-changing environment. Canyon allocates resources to managing material risks and opportunities by e.g. embedding a dedicated ESG team in the company structure, and having a clear governance structure. Canyon considers its strategy related to the material IROs outlined in this report to be resilient.

## 7.4.3.1.18 Processes to identify and assess material impacts, risks and opportunities

### Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities

In its double materiality assessment, Canyon identified material information on sustainability IROs and related material matters as well as material information to be reported. Judgement was used when applying the objective criteria, and the related explanations are expected to provide transparency from the undertaking to the users of the sustainability statement. Canyon's Double Materiality Assessment is based on the respective methodology outlined in ESRS 1. The gross perspective was applied (industry/legal standards as baseline without mitigation measures in place are the basis for the evaluation).

The Double Materiality Assessment methodology applied contains four main steps including (i) the identification of the sustainability landscape by also considering the previously conducted Single Materiality Assessment in the Double Materiality Assessment conducted in 2024; (ii) stakeholder engagement based on additionally identified stakeholders, which were not included in the single materiality assessment of 2022; (iii) creation of a longlist of potentially material topics; (iv) identification and evaluation of IROs in materiality workshops involving internal stakeholders through a guided process.

Seven workshops with the responsible internal stakeholders were conducted to identify actual and potential impacts, risks and opportunities. These workshops were conducted separately for the following standards: E1-E3, E4-E5, S1, S2, S3, S4, G1. When identifying the impacts, risks and opportunities the whole value chain was considered once for each assessment.

In order to determine which sustainability aspects are material, Canyon used scales from one to five and set the threshold at 3.5. This means that the top 30% of the identified impacts, risks and opportunities are covered and must be addressed as they are material. The materiality threshold for impacts was set on the same level as for financial effects at > 3.5.

## Description of process to identify, assess, prioritise and monitor potential and actual impacts on people and environment, informed by due diligence process

Canyon conducted a single materiality analysis in 2022. Globally-relevant ESG topics were used to create a longlist for this assessment. The selected topics were based on a peer benchmarking exercise, internal and external expertise, GRI Framework and potential impacts occurring in different lifecycle stages of a bicycle.

The initial longlist for the double materiality assessment in 2024 was based on the topics used for the previous single materiality assessment. In a preliminary assessment a shortlist of potential ESRS topics/sub-topics/sub-sub-topics was identified and used as a basis for the development of the longlist. The final longlist for the 2024 double materiality assessment contains topics that Canyon had already considered in its 2022 single materiality assessment plus the additional topics/sub-topics/sub-sub-topics required by ESRS. To ensure that the most important material topics of the industry were considered, a peer analysis, which did not lead to any further additions, was conducted.

Furthermore, no company- or sector-specific sustainability aspects (in addition to those listed in ESRS 1.AR 16) of Canyon's own business activities could be identified, as the topics were either covered by the list in ESRS 1 AR 16, or are relevant for peers but not for Canyon's business model.

In the following step, all identified topics were assigned in materiality workshops to the most granular level of the ESRS, which are the sub-sub-topics, according to ESRS 1, AR 16. By matching the topics with the associated standards, it was possible to assess which of the ESRS topics/sub-topics/sub-sub-topics had not yet been covered by the single materiality assessment conducted by Canyon in 2022.

The longlist formed the basis for the development of templates used for the quantitative IRO assessment used in the seven workshops. The templates were structured in line with the topics mapped for Canyon, and by applying different hierarchy levels for the respective ESRS – some were assessed on an aggregated topic-level, and some on a more detail sub- or sub-sub-topic level (as outlined in ESRS 1 Section 3 and related Appendix A).

During the workshops, material positive and negative as well as potential and actual impacts were identified by following the below process.

- Identification of impacts and assignment to ESRS topics/sub-topics/sub-sub-topics.
- Allocation of impacts in the value chain (upstream, downstream, whole value chain).
- Definition of each impacts' time horizon (short-, medium-, long-term).
- Assessment of the severity of negative impacts (scale, scope, remendability) and likelihood by applying a scale from 1 to 5. Positive impacts were assessed by considering scale, scope and likelihood.

The gross perspective was applied throughout the process by considering industry and legal standards without mitigation measures in place as the basis for the evaluation.

An aggregated impact value was calculated. If the impact passed a defined threshold, the impact was assessed as material. According to ESRS 1 AR 11 for ESRS S2, likelihood was not considered but rather if scale, scope or remendability exceeded the threshold, the impact was assessed as material.

Assumptions were made for scope boundaries and unification, to enable consistent evaluation of the scope. Furthermore, to avoid bias and enable comparability, negative impacts and positive impacts were standardised in their respective overall scores. During the assessment, past, present and future impacts derived from past, present or future events were considered.

## Description of how process focuses on specific activities, business relationships, geographies or other factors that give rise to heightened risk of adverse impacts

Canyon performed a holistic Double Materiality Assessment, covering all geographies, the whole value chain, and all business relationships.

## Description of how process considers impacts with which undertaking is involved through own operations or as result of business relationships

By considering the whole value chain, which includes also Canyon's own operations, and the implementation of due diligence processes which are aligned with international standards and frameworks, the process described above also considers impacts which Canyon is involved in through its own operations, or as a result of business relationships.

## Description of how process includes consultation with affected stakeholders to understand how they may be impacted and with external experts

Within the process of this single materiality analysis, Canyon identified internal and external key stakeholders. Canyon collected the stakeholders' expectations and views on potential material topics through non-directive interviews.

During the process of the 2024 double materiality analysis, additional stakeholders were identified. To align with the regulatory guidance, these stakeholders were divided into affected stakeholders and users of sustainability statements. All stakeholders' perspectives and interests were considered within the IRO Assessment as part of the double materiality analysis. In this regard, results from the 2022 single materiality and stakeholder analysis, specifically the longlist and answers given by stakeholders, were incorporated into the current assessment of the ESRS topics. External stakeholders that were not part of the single materiality assessment conducted in 2022 and as well as the validation of the 2022 findings were reassessed and validated by representative internal stakeholders during the materiality workshops.

## Description of how process prioritises negative impacts based on their relative severity and likelihood and positive impacts based on their relative scale, scope and likelihood and determines which sustainability matters are material for reporting purposes

The process prioritised negative impacts based on their relative severity and likelihood, and positive impacts based on their relative scale, scope and likelihood, and determined which sustainability maters are material for reporting purposes in line with the methodology outlined in ESRS 1 - 3.4 (§43-46).

To incorporate the ESRS 1 – 3.4 provision that "Any of the three characteristics (scale, scope, and irremediable character) can make a negative impact severe" into the decision-making process for materiality of impacts, Canyon conducted a severity analysis.

Impacts for which the highest value of the scale for one of the abovementioned characteristics was assigned but did not surpass the total materiality threshold, were listed separately in the IRO assessment. These impacts were reviewed to define whether they should be assessed as material impacts due to their severity, despite not reaching the overall materiality threshold. As a result of this reassessment none of the topics was rated as material.

To comply with paragraph 45 of ESRS 1, "In the case of a potential negative human rights impact, the severity of the impact takes precedence over its likelihood", the likelihood for potential negative human rights impacts was taken out of the calculation of the aggregated value, to prioritise the severity of the impact. Furthermore, for this kind of impact the highest value of any of the three characteristics (scale, scope, and irremediable character) defines the value of the aggregated value.

## Description of process used to identify, assess, prioritise and monitor risks and opportunities that have or may have financial effects

Financial materiality was assessed according to ESRS 1 - 3.5 (§47-51). Suitable scales to evaluate IROs according to ESRS requirements were based on the existing risk management scales at Canyon. These have an influence on the likelihood and financial effect scale and were adopted as such. For the other scales, Appendix 2.6 to the PTF-ESRS Batch 1 working papers (publication January 2022) was used as a basis, and corresponding scale was defined.

The process for identifying material risks and opportunities that trigger or could reasonably be expected to trigger material financial effects followed the below cadence.

- Identification of risks and opportunities and assignment to ESRS topics/sub-topics/sub-sub-topics.
- Allocation of impacts in the value chain (upstream, downstream, whole value chain).
- Definition of each impact's time horizon (short-, medium-, long-term).
- Assessment of the financial effect by applying a scale from 1 to 5.
- Assessment of likelihood by applying a scale from 1 to 5.

The gross perspective was applied throughout the process without considering mitigation measures.

An aggregated value was calculated. If the value passed a defined threshold of 3.5, the risk or opportunity was assessed to be material.

To identify, assess, prioritise and monitor potential and actual impacts on people and environment, informed by due diligence process, Canyon implemented below processes specifically for (i) ESRS E1 and (ii) ESRS E5.

(i) ESRS E1 Climate Change

Canyon is continuously deepening its understanding of how to identify and manage climate-related risks and opportunities, and of how to respond to potential impacts. Climate-related risks and opportunities are identified and assessed by the ESG Team with support from functional departments, distinguishing between physical and transition risks. Risks for E1 were identified, investigated and evaluated during the Double Materiality Assessment. In addition, the extent of the identified risks' impact on Canyon's emissions was investigated. Transitional risks in particular are directly related to Canyon's emissions; on the one hand, due to carbon pricing, but also due to expected raw material price changes resulting from decarbonization. The risk assessment covers mainly medium- and long-term risks and opportunities. Short-term risks are mostly assessed on an ad hoc basis due to the internal short-term time horizon definition. Preventive actions, mitigation, transfer, acceptance or control reactions to risks and opportunities are proposed by the ESG Team after cross-functional consultations and the evaluation of systemic interdependencies. The final decision on actions taken includes physical risks, transitional risks, price risks and reputational risks, amongst others.

### Assessment of physical risks

Canyon used climate and hazard models to map physical climate change hazards. Asset-level data was overlaid on the hazard map to quantify the risk exposure. Canyon considered the sensitivity of the business model, and adjusted the risk exposure according to risk sensitivity. The following hazards were covered: Coastal flooding, fluvial flooding, extreme heat and extreme cold, tropical cyclones, wildfire, water stress and droughts. Data from leading sources including public domain datasets and commercial partnerships were used. Sustainable 1 Climate Change Physical Risk Dataset was used for quantifying the exposure to physical climate-related risks. The dataset includes physical risk Exposure Scores representing exposure to climate hazards relative to global conditions. The dataset leverages a database of asset locations linked to corporate owners and ultimate parent entities that is maintained by SP Global. Since climate physical risk analytics is an emerging and rapidly advancing field Canyon expects that enhancements to the models and methodology underlying the Climate Change Physical Risk

Dataset will be necessary in the future to make informed decisions using the best data available. Chronic and severe hazards with material impacts were identified accordingly, and detailed metrics and indicators ana-lysed at relevant geospatial scales. The framework used for the assessment of physical risks is based on 4 IPCC scenarios (High: SSP5-RCP8.5, Moderate-High: SSP3-RCP7.0, Moderate: SSP2-RVP4.5, Low: SSP1-RCP2.6). Each scenario was assessed yearly by decade from 2020 to 2090, to capture both near-term and long-term risks.

## Assessment of transitional risks

Carbon prices related to Emission Trading Schemes (ETS), Carbon Taxes, Fuel Taxes and other policies are expected to rise in the future as governments take action to reduce greenhouse gas emissions in line with the Paris Agreement. The speed and level to which carbon prices may rise is un-certain and likely to vary across countries/ regions. To assess exposure to climate-related policy risk, Canyon used the Trucost database of current carbon taxes, ETS, and fuel taxes, covering 186 geographies. The projected carbon price trajectories used were informed by published research and cli-mate change modelling. Canyon also considered pass-through modelling of rising carbon prices from its electricity suppliers, and performed an analysis to draw insights on the impact of rising carbon prices on Canyon's financial performance. Likelihood was determined using IEA's Net Zero Scenario with a 2030-time horizon, and sector and company impact was considered to evaluate impact.

To effectively manage transition risks according to the TCFD framework, Canyon assessed four key areas: Policy and Legal, Technology, Market, and Reputation.

- Policy and Legal risks arise from increasing regulations such as carbon pricing, reporting obligations, and mandates on products and services. These can lead to higher costs, non-compliance risks, or exposure to climate-related litigation. To mitigate these risks, businesses must stay updated on regulatory changes and adapt accordingly.
- Technology risks involve the shift to lower-emission alternatives, which can disrupt existing products and services. Additionally, investments in new technologies may fail if they don't meet expectations or are quickly surpassed. Companies must balance innovation with care-full investment to avoid costly missteps.
- Market risks include changing consumer behaviour, uncertain market signals, and rising raw material costs. As demand for sustainable products increases, businesses must stay agile in responding to market shifts and managing supply chain volatility.
- Reputation risks stem from evolving consumer preferences and stakeholder concerns about sustainability. Companies that fail to align with these developments may face negative feedback and stigmatization, potentially losing market share. Transparent communication and strong sustainability efforts can have an influence on the reputation of any company.

Likelihood and magnitude of impact are crucial factors for evaluating potential impact, risks and opportunities. The likelihood of a given risk or opportunity depends on the climate scenario and the time horizon. For the assessment, the likelihood was evaluated based on the IEA's Net Zero Emissions scenario, with a time horizon set for the year 2030. This scenario provides a framework for understanding how the transition to a low-carbon economy may unfold under global climate action goals. The impact is assessed on two levels:

1. Sector impact refers to a broad assessment of how the risk or opportunity could affect the entire sector in which the company operates. This is a general view that reflects the overall industry's vulnerability or resilience to transition risks.
2. Company impact delves into how the risks, impacts and opportunities specifically affect Canyon. This takes into account Canyon's internal management processes, strategies, and policies designed to address these risks, impacts and opportunities.

Canyon identified the following risks, which have not all been assessed as material as described below. The disclosure of the physical risks that have not been assessed as material was evaluated as relevant to facilitate a holistic picture of the risk management process, that also considers interdependencies of isolated risks. The disclosure is aligned with the public disclosure through CDP.

## Identified physical risks

### Risk 1: Tropical Cyclones

Under the current High Climate Change Scenario SSP5-RCP8.5 from the IPCC, tropical cyclones were determined to be one of the top risks to production locations operating for suppliers of Canyon under a 4C scenario by 2050. Currently, tropical cyclones hit the region of Taiwan on average 12 times a year during the summer months. The related storm surge and high winds, plus strong precipitation might cause production interruptions due to direct damage to facilities and required infrastructure. If the affected production capacity cannot be replaced, and if damaged infrastructure cannot be repaired in a reasonable amount of time, and if no stock is available to replace lost capacity, these supply chain disruptions might reduce revenues and delay material and/ or component supply. The resulting potential reputational damage, lost sales, or markdowns, could have adverse effects on Canyon, impacting financial performance and operations. 65 sites are highly exposed to physical risks across all indicators, representing 85% of business activity. 21 factories in the region of Taiwan have been identified as especially vulnerable to this risk, representing 28% of Canyon's business activity. The risk has been identified but is below the established threshold and is therefore not material.

### Risk 2: Changing temperature

Under the current High Climate Change Scenario SSP5-RCP8.5 from the IPCC, Canyon identified heatwaves as one of the most significant acute physical risks. In its "Working on a warmer Planet" report, the ILO estimates that under the RCP2.6 climate change pathway, which envisages a global average temperature rise of 1.5C by the end of the century, the region of Taiwan will face a loss of around 49,000 full-time jobs due to heat stress by 2030. Estimates for manufacturing show a loss of 0.6% of working hours. For China, estimates show a loss of approx. 5.4 million full-time jobs by 2030 due to heat stress. Estimates for manufacturing show a loss of 0.91% of working hours. Around 26% of Canyon suppliers' facilities are in areas of Moderate Extreme Heat Risk – primarily in the region of Taiwan. Around 30% of business activity at Canyon and all factories in the region of Taiwan are projected to be exposed to moderate extreme heat risk by 2050 under a 4C emissions scenario. The risk has been identified but is below the established threshold and is therefore not material.

### Identified transitional risk

**Risk: Transition to lower emissions technology and products**

According to the IPCC AR6, steel and plastic costs are expected to increase in a deep decarbonisation scenario. In general, the planned net-zero pathway is estimated to be 3–25% costlier compared to the baseline. In addition to the price increase driven by decarbonisation, raw material shortages for low-carbon materials can be expected until the necessary economies of scale can be reached. A direct increase in the prices of raw materials can be expected, as well as the passing-on of these impacts by component manufacturers to Canyon. Key raw materials used to produce Canyon Bikes, including components, are aluminium, carbon fiber, steel, plastic, and rubber. The main materials used in Canyon bicycles are aluminium, plastic (including composites), steel, and rubber. Together they account for 85% of all materials used by weight. Estimates of cost increases for these materials were partly based on the IPCC AR6 WGII full report in a deep decarbonisation scenario (steel and plastic). Price increases for other materials are best estimates. In a best-case and potential minimum financial impact scenario, a price increase by 2050 of 17% for aluminium, 20% for plastic (including composites), 20% for steel and 5% for rubber was assumed. In a worst-case scenario, the price impact for aluminium was estimated to increase by 20% and for plastic and steel by 30%. In a weighted approach, the forecasted spend for 2030 was linked to the respective share of every material in relation to total spent, and the relevant price increase was applied, leading to a consolidated price increase figure. Since price increases were linked to a 2050-time horizon and spent figures to a 2030-time horizon, additional spend due to price increase of materials was reduced by 50% to consider impacts in a mid-term time horizon. Impacts associated with packaging materials were not included in the calculation.

## Description of how connections of impacts and dependencies with risks and opportunities that may arise from those impacts and dependencies have been considered

The connection between impacts and dependencies with risks, and the opportunities that may arise from those impacts and dependencies were considered during the materiality workshops, including dependencies in the respective template where applicable. This was also addressed during the validation procedure of the IROs.

## Description of how sustainability-related risks relative to other types of risks have been prioritised

Sustainability risks are addressed in the Audit Committee and are an integral part of Canyon's risk management approach. All identified risks are categorised, and mitigation measures are defined.

## Description of decision-making process and related internal control procedures

The overall goal is to develop an IRO assessment that includes and considers the perspective of relevant stakeholders, and consequently allows Canyon to set thresholds and identify material IROs.

To achieve this goal, three review sessions took place. In the first session, Canyon internally validated the outcome of the IRO assessment templates with internal stakeholders and departments. In the second session, the IRO templates, including the input from the first session, were critically reviewed by an external consulting firm. In the third session, the external consulting firm and Canyon reviewed the IRO results together. Throughout all three review sessions adjustments regarding the overall assessment of the identified impacts, risks and opportunities were made. Adjusting and finalising each IRO template has been the basis for defining a threshold.

The following guiding questions shaped the review sessions.

- Has the application of both 'Inside-Out' and 'Outside-In' perspectives been consistently applied?
- Are there any obvious impacts, risks or opportunities not yet included in the assessment?
- Is the explanation of the chosen scale, scope, remedy and financial effect sufficient, plausible and audit-proof?
- Has the perspective of internal and external stakeholders been considered?
- Is the picture coherent from a holistic perspective when comparing the impacts, risks and opportunities for the different topics?

After finalizing the IRO assessment, a final validation and approval by the Board of Directors took place on the 11th of June 2024.

## Description of extent to which and how process to identify, assess and manage impacts and risks is integrated into overall risk management process and used to evaluate overall risk profile and risk management processes

Canyon's risk management system includes the identification, categorisation and documentation of risks that could have a significant impact not only on the company but also on the environment and society. Risks are assessed and categorised and will be discussed by the Board of Directors and the members of the Audit Committee. Necessary measures to mitigate risks are defined.

## Description of extent to which and how process to identify, assess and manage opportunities is integrated into overall management process

Opportunities are communicated to Canyon's governing bodies at least once per year and prioritised accordingly by the Board of Directors, whilst considering the overall company strategy and availability of resources, know-how and technological developments.

## 7.4.3.1.19 Disclosure Requirements included in the undertaking's sustainability statement and of the topics that have been omitted as not material

### Disclosure of list of data points that derive from other EU legislation and information on their location in sustainability statemen

| Disclosure requirement | Data point | Sustainability statement topic | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| **ESRS 2 GOV-1** | 21 (d) | Board's gender diversity | Indicator number 13 of Table #1 of Annex 1 | | Commission Delegated Regulation (EU) 2020/1816 ( 27 ) , Annex II | | reported by Canyon | [7.4.3.1.7] |
| **ESRS 2 GOV-1** | 21 (e) | Percentage of board members who are independent | | | Delegated Regulation (EU) 2020/1816, Annex II | | reported by Canyon | [7.4.3.1.7] |
| **ESRS 2 GOV-4** | 30 | Statement on due diligence | Indicator number 10<br>Table #3 of Annex 1 | | | | reported by Canyon | [7.4.3.1.12] |
| **ESRS 2 SBM-1** | 40 (d) i | Involvement in activities related to fossil fuel activities | Indicators number 4<br>Table #1 of Annex 1 | Article 449a Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU) 2022/2453 ( 28 )<br>Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk | Delegated Regulation (EU) 2020/1816, Annex II | | not relevant for Canyon | |
| **ESRS 2 SBM-1** | 40 (d) ii | Involvement in activities related to chemical production | Indicator number 9<br>Table #2 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II | | not relevant for Canyon | |
| **ESRS 2 SBM-1** | 40 (d) iii | Involvement in activities related to controversial weapons | Indicator number 14<br>Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1818 ( 29 ) , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | | not relevant for Canyon | |
| **ESRS 2 SBM-1** | 40 (d) iv | Involvement in activities related to cultivation and production of tobacco | | | Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | | not relevant for Canyon | |
| **ESRS E1-1** | 14 | Transition plan to reach climate neutrality by 2050 | | | | Regulation (EU) 2021/1119, Article 2(1) | reported by Canyon | [7.4.3.2.2] |

| Disclosure requirement | Data point | Sustainability statement topic | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| **ESRS E1-1** | 16 (g) | Undertakings excluded from Paris-aligned Benchmarks | | Article 449a<br>Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2 | | reported by Canyon | [7.4.3.2.2] |
| **ESRS E1-4** | 34 | GHG emission reduction targets | Indicator number 4<br>Table #2 of Annex 1 | Article 449a<br>Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 6 | | reported by Canyon | [7.4.3.2.6] |
| **ESRS E1-5** | 38 | Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors ) | Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1 | | | | reported by Canyon | [7.4.3.2.9] |
| **ESRS E1-5** | 37 | Energy consumption and mix | Indicator number 5<br>Table #1 of Annex 1 | | | | reported by Canyon | [7.4.3.2.9] |
| **ESRS E1-5** | 40-43 | Energy intensity associated with activities in high climate impact sectors | Indicator number 6<br>Table #1 of Annex 1 | | | | reported by Canyon | [7.4.3.2.9] |
| **ESRS E1-6** | 44 | Gross Scope 1, 2, 3 and Total GHG emissions | Indicators number 1 and 2<br>Table #1 of Annex 1 | Article 449a;<br>Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1 | | reported by Canyon | [7.4.3.2.13] |
| **ESRS E1-6** | 53-55 | Gross GHG emissions intensity | Indicators number 3<br>Table #1 of Annex 1 | Article 449a<br>Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 8(1) | | reported by Canyon | [7.4.3.2.11] |

| Disclosure requirement | Data point | Sustainability statement topic | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| **ESRS E1-7** | 56 | GHG removals and carbon credits | | | | Regulation (EU) 2021/1119, Article 2(1) | not relevant for Canyon | |
| **ESRS E1-9** | 66 | Exposure of the benchmark portfolio to climate-related physical risk | | | Delegated Regulation (EU) 2020/1818, Annex II<br><br>Delegated Regulation (EU) 2020/1816, Annex II | | not relevant for Canyon (Phase In) | |
| **ESRS E1-9** | 66 (a); 66 (c) | Disaggregation of monetary amounts by acute and chronic physical risk; Location of significant assets at material physical risk | | Article 449a<br><br>Regulation (EU) No 575/2013;<br><br>Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk. | | | not relevant for Canyon (Phase In) | |
| **ESRS E1-9** | 67 (c) | Breakdown of the carrying value of its real estate assets by energy-efficiency classes | | Article 449a<br><br>Regulation (EU) No 575/2013;<br><br>Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral | | | not relevant for Canyon (Phase In) | |
| **ESRS E1-9** | 69 | Degree of exposure of the portfolio to climate-related opportunities | | | Delegated Regulation (EU) 2020/1818, Annex II | | not relevant for Canyon (Phase In) | |
| **ESRS E2-4** | 28 | Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil | Indicator number 8<br><br>Table #1 of Annex 1<br><br>Indicator number 2<br><br>Table #2 of Annex 1<br><br>Indicator number 1<br><br>Table #2 of Annex 1<br><br>Indicator number 3<br><br>Table #2 of Annex 1 | | | | not material for Canyon | |
| **ESRS E3-1** | 9 | Water and marine resources | Indicator number 7<br><br>Table #2 of Annex 1 | | | | not material for Canyon | |
| **ESRS E3-1** | 13 | Dedicated policy | Indicator number 8<br><br>Table 2 of Annex 1 | | | | not material for Canyon | |
| **ESRS E3-4** | 14 | Sustainable oceans and seas | Indicator number 12<br><br>Table #2 of Annex 1 | | | | not material for Canyon | |

| Disclosure requirement | Data point | Sustainability statement topic | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| **ESRS E3-4** | 28 c | Total water recycled and reused | Indicator number 6.2<br>Table #2 of Annex 1 | | | | not material for Canyon | |
| **ESRS E3-4** | 29 | Total water consumption in $m^3$ per net revenue on own operations | Indicator number 6.1<br>Table #2 of Annex 1 | | | | not material for Canyon | |
| **ESRS 2 - IRO 1 -E4** | 16 (a) | | Indicator number 7<br>Table #1 of Annex 1 | | | | not material for Canyon | |
| **ESRS 2 - IRO 1 -E4** | 16 (b) | | Indicator number 10<br>Table #2 of Annex 1 | | | | not material for Canyon | |
| **ESRS 2 - IRO 1 -E4** | 16 (c) | | Indicator number 14<br>Table #2 of Annex 1 | | | | not material for Canyon | |
| **ESRS E4-2** | 24 (b) | Sustainable land / agriculture practices or policies | Indicator number 11<br>Table #2 of Annex 1 | | | | not material for Canyon | |
| **ESRS E4-2** | 24 (c) | Sustainable oceans / seas practices or policies | Indicator number 12<br>Table #2 of Annex 1 | | | | not material for Canyon | |
| **ESRS E4-2** | 24 (d) | Policies to address deforestation | Indicator number 15<br>Table #2 of Annex 1 | | | | not material for Canyon | |
| **ESRS E5-5** | 37 (d) | Non-recycled waste | Indicator number 13<br>Table #2 of Annex 1 | | | | reported by Canyon | [7.4.3.3.11] |
| **ESRS E5-5** | 39 | Hazardous waste and radioactive waste | Indicator number 9<br>Table #1 of Annex 1 | | | | reported by Canyon | [7.4.3.3.11] |
| **ESRS 2- SBM3 - S1** | 14 (f) | Risk of incidents of forced labour | Indicator number 13<br>Table #3 of Annex I | | | | reported by Canyon | [7.4.3.4.1] |
| **ESRS 2- SBM3 - S1** | 14 (g) | Risk of incidents of child labour | Indicator number 12<br>Table #3 of Annex I | | | | reported by Canyon | [7.4.3.4.2] |
| **ESRS S1-1** | 20 | Human rights policy commitments | Indicator number 9<br>Table #3 and Indicator number 11<br>Table #1 of Annex I | | | | reported by Canyon | [7.4.3.4.2] |
| **ESRS S1-1** | 21 | due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | | | Delegated Regulation (EU) 2020/1816, Annex II | | reported by Canyon | [7.4.3.4.2] |
| **ESRS S1-1** | 22 | Processes and measures for preventing trafficking in human beings | Indicator number 11<br>Table #3 of Annex I | | | | reported by Canyon | [7.4.3.4.2] |
| **ESRS S1-1** | 23 | Workplace accident prevention policy or management system | Indicator number 1<br>Table #3 of Annex I | | | | reported by Canyon | [7.4.3.4.2] |

| Disclosure requirement | Data point | Sustainability statement topic | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| **ESRS S1-3** | 32 (c) | Grievance/ complaints handling mechanisms | Indicator number 5<br>Table #3 of Annex I | | | | reported by Canyon | [7.4.3.4.4] |
| **ESRS S1-14** | 88 (b) and (c) | Number of fatalities and number and rate of work-related accidents | Indicator number 2<br>Table #3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | reported by Canyon | [7.4.3.4.11] |
| **ESRS S1-14** | 88 (e) | Number of days lost to injuries, accidents, fatalities or illness | Indicator number 3<br>Table #3 of Annex I | | | | reported by Canyon | [7.4.3.4.11] |
| **ESRS S1-16** | 97 (a) | Unadjusted gender pay gap | Indicator number 12<br>Table #1 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | not material for Canyon | |
| **ESRS S1-16** | 97 (b) | Excessive CEO pay ratio | Indicator number 8<br>Table #3 of Annex I | | | | not material for Canyon | |
| **ESRS S1-17** | 103 (a) | Incidents of discrimination | Indicator number 7<br>Table #3 of Annex I | | | | reported by Canyon | [7.4.3.4.15] |
| **ESRS S1-17** | 104 (a) | Non-respect of UNGPs on Business and Human Rights and OECD | Indicator number 10<br>Table #1 and Indicator n. 14<br>Table #3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1) | | reported by Canyon | [7.4.3.4.15] |
| **ESRS 2-SBM3-S2** | 11 (b) | Significant risk of child labour or forced labour in the value chain | Indicators number 12 and n. 13<br>Table #3 of Annex I | | | | reported by Canyon | [7.4.3.5.1] |
| **ESRS S2-1** | 17 | Human rights policy commitments | Indicator number 9<br>Table #3 and Indicator n. 11<br>Table #1 of Annex 1 | | | | reported by Canyon | [7.4.3.5.2] |
| **ESRS S2-1** | 18 | Policies related to value chain workers | Indicator number 11 and n. 4<br>Table #3 of Annex 1 | | | | reported by Canyon | [7.4.3.5.2] |
| **ESRS S2-1** | 19 | Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines | Indicator number 10<br>Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | reported by Canyon | [7.4.3.5.2] |
| **ESRS S2-1** | 19 | Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | | | Delegated Regulation (EU) 2020/1816, Annex II | | reported by Canyon | [7.4.3.5.2] |
| **ESRS S2-4** | 36 | Human rights issues and incidents connected to its upstream and downstream value chain | Indicator number 14<br>Table #3 of Annex 1 | | | | reported by Canyon | [7.4.3.5.4] |

| Disclosure requirement | Data point | Sustainability statement topic | SFRD reference | Pillar 3 reference | Benchmark regulation reference | EU Climate law reference | Section | Page |
|---|---|---|---|---|---|---|---|---|
| **ESRS S3-1** | 16 | Human rights policy commitments | Indicator number 9<br><br>Table #3 of Annex 1 and Indicator number 11<br><br>Table #1 of Annex 1 | | | | not material for Canyon | |
| **ESRS S3-1** | 17 | Non-respect of UNGPs on Business and Human Rights, and OECD guidelines | Indicator number 10<br><br>Table #1 Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | not material for Canyon | |
| **ESRS S3-4** | 36 | Human rights issues and incidents | Indicator number 14<br><br>Table #3 of Annex 1 | | | | not material for Canyon | |
| **ESRS S4-1** | 16 | Policies related to consumers and end-users | Indicator number 9<br><br>Table #3 and Indicator number 11<br><br>Table #1 of Annex 1 | | | | reported by Canyon | [7.4.3.6.2] |
| **ESRS S4-1** | 17 | Non-respect of UNGPs on Business and Human Rights and OECD guidelines | Indicator number 10<br><br>Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1) | | reported by Canyon | [7.4.3.6.2] |
| **ESRS S4-4** | 35 | Human rights issues and incidents | Indicator number 14<br><br>Table #3 of Annex 1 | | | | reported by Canyon | [7.4.3.6.5] |
| **ESRS G1-1** | 10 (b) | United Nations Convention against Corruption | Indicator number 15<br><br>Table #3 of Annex 1 | | | | not relevant for Canyon | |
| **ESRS G1-1** | 10 (d) | Protection of whistle- blowers | Indicator number 6<br><br>Table #3 of Annex 1 | | | | reported by Canyon | [7.4.3.7.2] |
| **ESRS G1-4** | 24 (a) | Fines for violation of anti-corruption and anti-bribery laws | Indicator number 17<br><br>Table #3 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II) | | not material for Canyon | |
| **ESRS G1-4** | 24 (b) | Standards of anti- corruption and anti-bribery | Indicator number 16<br><br>Table #3 of Annex 1 | | | | not material for Canyon | |

## Disclosure of list of ESRS Disclosure Requirements complied with in preparing sustainability statement following outcome of materiality assessment

| Disclosure | ESRS E1 - Climate change | Page |
|---|---|---|
| *Governance* | | |
| ESRS 2, GOV-3 | Integration of sustainability-related performance in incentive schemes | [7.4.3.2.1] |
| *Strategy* | | |
| E1-1 | Transition plan for climate change mitigation | [7.4.3.2.2] |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | [7.4.3.2.3] |
| *IRO* | | |
| ESRS 2, IRO-1 | Description of the processes to identify and assess material climate-related impacts, risks and opportunities | [7.4.3.2.3] |
| E1-2 | Policies related to climate change mitigation and adaptation | [7.4.3.2.4] |
| E1-3 | Actions and resources in relation to climate change policies | [7.4.3.2.5] |
| *Metrics and targets* | | |
| E1-4 | Targets related to climate change mitigation and adaptation | [7.4.3.2.6] |
| E1-5 | Energy consumption and mix | [7.4.3.2.9] |
| E1-6 | Gross Scopes 1, 2, 3 and Total GHG emissions | [7.4.3.2.13] |

| Disclosure | ESRS E5 – Circular economy | Page |
|---|---|---|
| *IRO* | | |
| ESRS 2, IRO-1 | Description of the processes to identify and assess material climate-related impacts, risks and opportunities | [7.4.3.3.1] |
| E5-1 | Policies related to resource use and circular economy | [7.4.3.3.2] |
| E5-2 | Actions and resources in relation to resource use and circular economy | [7.4.3.3.4] |
| *Metrics and targets* | | |
| E5-3 | Targets related to resource use and circular economy | [7.4.3.3.5] |
| E5-4 | Resource inflows | [7.4.3.3.7] |
| E5-5 | Resource outflows | [7.4.3.3.8] |

| disclosure | ESRS S1: Own workforce | Page |
|---|---|---|
| *Strategy* | | |
| ESRS 2, SBM-2 | Interests and views of stakeholders | [7.4.3.4.1] |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | [7.4.3.4.1] |
| *IRO* | | |
| S1-1 | Policies related to own workforce | [7.4.3.4.2] |
| S1-2 | Processes for engaging with own workers and workers' representatives about impacts | [7.4.3.4.3] |
| S1-3 | Processes to remediate negative impacts and channels for own workers to raise concerns | [7.4.3.4.4] |
| 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 action | [7.4.3.4.5] |
| *Metrics and targets* | | |
| S1-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | [7.4.3.4.6] |
| S1-6 | Characteristics of the undertaking's employee | [7.4.3.4.7] |
| S1-14 | Health and safety metrics | [7.4.3.4.11] |
| S1-17 | Incidents, complaints and severe human rights impacts | [7.4.3.4.15] |

| disclosure | ESRS S2: Workers in the value chain | Page |
|---|---|---|
| *Strategy* | | |
| ESRS 2, SBM-2 | Interests and views of stakeholders | [7.4.3.5.1] |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | [7.4.3.5.1] |
| *IRO* | | |
| S2-1 | Policies related to value chain workers | [7.4.3.5.2] |
| S2-2 | Processes for engaging with value chain workers about impacts | [7.4.3.5.3] |
| S2-3 | Processes to remediate negative impacts and channels for value chain workers to raise concerns | [7.4.3.5.4] |
| 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 | [7.4.3.5.5] |
| *Metrics and targets* | | |
| S2-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | [7.4.3.5.6] |

| disclosure | ESRS S4: Consumers and end-users | Page |
|---|---|---|
| *Strategy* | | |
| ESRS 2, SBM-2 | Interests and views of stakeholders | [7.4.3.6.1] |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | [7.4.3.6.1] |
| *IRO* | | |
| S4-1 | Policies related to consumers and end-users | [7.4.3.6.2] |
| S4-2 | Processes for engaging with consumers and end-users about impacts | [7.4.3.6.3] |
| S4-3 | Processes to remediate negative impacts and channels for consumers and end-users to raise concerns | [7.4.3.6.4] |
| S4-4 | Taking action on material impacts, and approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users and effectiveness of those actions and approaches | [7.4.3.6.5] |
| *Metrics and targets* | | |
| S4-5 | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | [7.4.3.6.6] |

| disclosure | ESRS G1: Business conduct | Page |
|---|---|---|
| *Governance* | | |
| ESRS 2, GOV-1 | The role of the administrative, supervisory and management bodies | [7.4.3.7.1] |
| *IRO* | | |
| ESRS 2, IRO-1 | Description of the processes to identify and assess material impacts, risks and opportunities | [7.4.3.7.2] |
| G1-1 | Business conduct policies and corporate culture | [7.4.3.7.2] |
| *Metrics and targets* | | |
| G1-4 | Incidents of corruption or bribery | [7.4.3.7.3] |

## Explanation of negative materiality assessment for ESRS E1 Climate change

ESRS E1 has been assessed as material for Canyon and is accordingly disclosed in this sustainability statement in line with the requirements from respective ESRS.

## Explanation of how material information to be disclosed in relation to material impacts, risks and opportunities has been determined

Canyon conducted a single materiality analysis in 2022. Globally relevant ESG topics were used to create a longlist for this assessment. Topics were selected based on a peer benchmarking exercise, internal and external expertise, GRI Framework and potential impacts occurring in different lifecycle stages of a bicycle. Within the process of this single materiality analysis, Canyon identified internal and external key stakeholders. Canyon collected the stakeholders' expectations and views on potential material topics through non-directive interviews.

During the process of the 2024 double materiality analysis, additional stakeholders were identified. To align with the regulatory guidance, these stakeholders were divided into affected stakeholders and users of sustainability statements. All stakeholders' perspectives and interests were considered within the IRO Assessment as part of the double materiality analysis. In this regard, results from the 2022 single materiality and stakeholder analysis, specifically the longlist and answers given by stakeholders, were incorporated into the current assessment of the ESRS topics. External stakeholders that were not part of the single materiality assessment conducted in 2022 and as well as the validation of the 2022 findings were reassessed and validated by representative internal stakeholders during the materiality workshops.

Suitable scales to evaluate IROs according to ESRS requirements were based on the existing risk management scales at Canyon. These have an influence on the likelihood and financial effect scale and were adopted as such. For the other scales, Appendix 2.6 to the PTF-ESRS Batch 1 working papers (publication January 2022) was used as a basis and a corresponding scale was defined. Assumptions were made for scope boundaries and unification, to enable consistent evaluation of the scope. Furthermore, to avoid bias and enable comparability, negative impacts and positive impacts were standardised in their respective overall scores.

## 7.4.3.2 Environmental Information: Climate Change

### 7.4.3.2.1 Integration of climate-related performance in incentive schemes

#### Disclosure of how climate-related considerations are factored into remuneration of members of administrative, management and supervisory bodies

For the reporting year 2024, the remuneration of members of Canyon's administrative, management and supervisory bodies did not take climate-related aspects into account, and their performance was not assessed against the greenhouse gas emission reduction targets.

#### Percentage of remuneration recognised that is linked to climate related considerations

N/A

#### Explanation of climate-related considerations that are factored into remuneration of members of administrative, management and supervisory bodies

*See Disclosure of how climate-related considerations are factored into remuneration of members of administrative, management and supervisory bodies*

### 7.4.3.2.2 Transition plan for climate change mitigation

#### Disclosure of transition plan for climate change mitigation

The Canyon Climate Transition Plan addresses all material impacts, risks and selected opportunities related to climate change mitigation. This includes a breakdown in energy data and all upstream and downstream emission sources. The goal of the climate transition plan is to systematically reduce Canyon's greenhouse gas emissions and align its business operations with global climate goals, specifically limiting global warming to 1.5°C above pre-industrial levels, as outlined in the Paris Agreement. Ultimately, the climate transition plan aims to balance environmental responsibility with economic growth, safeguarding the company's future in a rapidly changing regulatory and market environment.

#### Explanation of how targets are compatible with limiting of global warming to one and half degrees Celsius in line with Paris Agreement

At the beginning of 2024 the Science Based Targets initiative (SBTi) verified  Canyon Bicycles GmbH net-zero science-based target of reducing the release of climate-damaging greenhouse gas (GHG) emissions within the company (Scope 1), by its energy suppliers (Scope 2) and in its upstream and downstream supply chain (Scope 3) by 2050. Canyon has committed to reducing absolute Scope 1 and 2 GHG emissions by 51% by 2032 from its base year in 2022 (includes biogenic land-related emissions and removals from bioenergy feedstocks). This is a combined target of Scope 1 and 2. No separate target has been defined for each scope. Canyon has also committed to reducing its indirect Scope 3 GHG emissions per bike produced by 58.2% within the same timeframe. In the long term, Canyon has committed to reducing absolute Scope 1 and 2 GHG emissions by 90% by 2050, and Scope 3 GHG emissions per bicycle produced by 97% within the same timeframe.

#### Disclosure of decarbonisation levers and key action

Key decarbonisation levers Scope 1 & 2:

1. To reduce Scope 1 emissions, it is essential to transition Canyon's vehicle fleet from internal combustion engine and Plug-In-Hybrid Electric Vehicle as the fleet accounts for around 50% of Scope 1 & 2 emissions. The internal vehicle policy was updated accordingly.
2. In the coming years, Canyon will evaluate the possibility of replacing natural gas used for heating with biogas.
3. Canyon already sources around 90% renewable electricity, with plans to increase this share.

Key decarbonisation lever Scope 3:

For Scope 3, most emissions come from category 1, relating to materials used in bike production, including pack-aging and accessories. Identified focus areas include:

- Using recycled materials to replace virgin aluminium and plastics,
- Evaluating low-carbon aluminium sourcing,
- Exploring alternative business models,
- Investigating alternative materials like glass and natural fibres,
- Reducing material use through improved product/ packaging design and process optimization,
- Collaborating with key suppliers to assess current impacts, share knowledge, and implement joint re-duction measures,

- For packaging, though a small part of category 1 emissions, Canyon aims to increase recycled material use and eliminate unnecessary single-use plastic.

Additionally, working groups were established in 2024 to develop decarbonization strategies related to raw material usage, particularly for aluminium and carbon fibre, including the use of recycled or low-carbon materials.

## Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan

Significant operational expenditures (OPEX) and capital expenditures (CAPEX) are set to remain below the established financial threshold.

## Explanation of potential locked-in GHG emissions from key assets and products and of how locked-in GHG emissions may jeopardise achievement of GHG emission reduction targets and drive transition risk

Emissions from Canyon own sites (Scope 1 and 2) are expected to remain constant in the future unless specific reduction measures are implemented, as energy consumption is primarily driven by lighting, heating, and the vehicle fleet. When validating climate targets through the Science-Based Targets initiative, any potential growth assumptions must also be considered. The majority of emissions fall under Scope 3, specifically in category 1 (purchased goods and services) and category 4 (upstream transportation). Due to the relative reduction target per bicycle produced, the measures are largely unaffected by growth. Furthermore, emissions from the use phase are not considered as relevant. Based on this, potential locked-in GHG emissions do not pose a risk.

## Explanation of any objective or plans (CapEx, CapEx plans, OpEx) for aligning economic activities (revenues, CapEx, OpEx) with criteria established in Commission Delegated Regulation 2021/2139

Canyon's bike manufacturing activities corresponding to 100% of bike revenue contribute substantially to the environmental objective of climate change mitigation thanks to the products manufactured meeting the Technical Screening Criteria of the EU Taxonomy: personal mobility devices with a propulsion that comes from the physical activity of the user ("push bikes") or a mix of zero-emissions motor and physical activity ("electric bikes"). Canyon did not make any capital expenditures related to economic activities related to coal, oil and gas during the reporting period.

## Undertaking is excluded from EU Paris-aligned Benchmarks

N/A

## Explanation of how transition plan is embedded in and aligned with overall business strategy and financial planning

The implementation of the transition plan started with the SBTi commitment at the end of 2023, but is not yet finalized, since it covers various aspects. Topics such as internalizing $CO_2$ price or comprehensive financial planning for all climate-relevant measures have not been implemented yet. However, topics such as the assessment of physical and transition risks, greenhouse gas accounting and the externally validated science-based targets (near-term and long-term) have been integrated into key operational business processes and are supported by the overall business strategy. These aspects also represent the most important parts of the transition plan.

## Transition plan is approved by administrative, management and supervisory bodies

*See Explanation of how transition plan is embedded in and aligned with overall business strategy and financial planning*

## Explanation of progress in implementing transition plan

*See Explanation of how transition plan is embedded in and aligned with overall business strategy and financial planning*

## Date of adoption of transition plan for undertakings not having adopted transition plan yet

*See Explanation of how transition plan is embedded in and aligned with overall business strategy and financial planning*

## 7.4.3.2.3 Material impacts, risks and opportunities and their interaction with strategy and business model

### Type of climate-related risk

Canyon is continuously deepening its understanding of how to identify and manage climate-related risks and opportunities, and of how to respond to potential impacts. Climate-related risks and opportunities are identified and assessed by the ESG Team with support from functional departments, distinguishing between physical and transition risks.

### Description of scope of resilience analysis

Canyon completed a resilience analysis as part of its 2023 climate risk assessment. The Scope of this analysis mirrors that of the risk assessment, covering both its own operations and also upstream and downstream value chains. As such, the analysis includes both material and non-material risks. The analysis examines the extent to which Canyon's strategy responds to identified IROs, and whether adjustments are necessary. Canyon considers its strategy resilient in the face of material risks, with the transition to lower-emission technologies and products identified as a key material risk. The potential rise in direct costs due to increasing raw material prices is addressed in the following sections and has been discussed internally. One potential mitigation strategy involves sourcing recycled materials, which could help offset the financial impact of price increases for virgin materials. To capitalize on this opportunity and explore other low-carbon materials, continuous investment in research, development, and quality management is necessary to identify optimal use cases. Furthermore, the potential shortage of low-carbon materials must be mitigated by securing long-term contracts with deeper supply chain actors. New business models focused on reducing dependence virgin materials, while extending product lifetimes, are also expected to mitigate the risk of rising raw material costs. These models would decrease the need for new materials and prolong the reuse phase of products. The financial impact of these measures is not included in the current assessment.

### Disclosure of how resilience analysis has been conducted

*See Description of Scope of resilience analysis*

### Date of resilience analysis

Canyon completed a resilience analysis as part of its 2023 climate risk assessment.

### Description of results of resilience analysis

*See Description of Scope of resilience analysis*

### Time horizons applied for resilience analysis

*See Description of Scope of resilience analysis*

### Description of ability to adjust or adapt strategy and business model to climate change

The degree of influence over climate-related impacts and risks varies depending on the specific nature of the impact or risk. For instance, the ability to adapt to acute and chronic physical climate risks, such as extreme weather events or long-term temperature changes, is relatively limited due to external factors beyond direct organizational control.

However, overarching mitigation efforts focus on reducing all identified risks and impacts by prioritizing the reduction of the company's own greenhouse gas emissions. By aligning with science-based targets and fostering collaboration across the value chain, the organization contributes to systemic climate resilience while addressing its direct and indirect climate-related risks.

For further information, please refer to Description of Scope of resilience analysis

Description of the processes to identify and assess material climate-related impacts, risks and opportunities

### Description of process in relation to impacts on climate change

Canyon continuously deepens its understanding of identifying and managing climate-related risks and opportunities. The ESG Team, with support from functional departments, distinguishes between physical and transition risks, focusing on medium- and long-term impacts. Actions are proposed by the ESG Team after cross-functional consultations, addressing emissions and systemic interdependencies.

## Description of process in relation to climate-related physical risks in own operations and along value chain

Physical risks are assessed by overlaying asset-level data on climate and hazard models. Hazards such as coastal and fluvial flooding, extreme temperatures, and droughts are evaluated using leading datasets, including SP Global's Sustainable1 dataset. Chronic and acute hazards are analyzed using IPCC scenarios.

## Description of process in relation to climate-related transition risks and opportunities in own operations and along value chain

Transition risks were identified and assessed through carbon pricing, regulatory developments, and raw material pricing. The Trucost database and IEA's Net Zero scenario were used to evaluate financial and operational impacts.

## Explanation of how climate-related scenario analysis has been used to inform identification and assessment of physical risks over short, medium and long-term

Canyon conducted scenario analyses yearly by decade from 2020 to 2090 using IPCC scenarios, allowing the identification of chronic and acute hazards and their impacts on operations over varying time horizons.

## Explanation of how climate-related scenario analysis has been used to inform identification and assessment of transition risks and opportunities over short, medium and long-term

Canyon conducted scenario analyses yearly by decade from 2020 to 2090 using IPCC scenarios, allowing the identification of chronic and acute hazards and their impacts on operations over varying time horizons.

## Climate-related hazards have been identified over short-, medium- and long-term time horizons

Hazards were assessed using IPCC scenarios over yearly intervals from 2020 to 2090. Short-term risks are reviewed ad hoc, while medium- and long-term hazards, such as tropical cyclones and heatwaves, are identified under different emissions scenarios.

## Undertaking has screened whether assets and business activities may be exposed to climate-related hazards

Canyon mapped physical climate hazards and overlaid this data with asset-level exposure, focusing on geospatial analysis and sensitivity adjustments. Risks across 65 sites and 21 factories in Taiwan, representing significant business activity, were evaluated for exposure.

## Short-, medium- and long-term time horizons have been defined

Time horizons are defined as short-term (ad hoc assessments), medium-term (2030 horizon), and long-term (2050+), with analysis based on IPCC scenarios from SSP5-RCP8.5 to SSP1-RCP2.6.

## Extent to which assets and business activities may be exposed and are sensitive to identified climate-related hazards has been assessed

Canyon assessed sensitivity to risks such as tropical cyclones and extreme heat, finding 85% of its business activity exposed to physical risks and 30% projected to face moderate extreme heat risks by 2050 under high-emissions scenarios.

## Identification of climate-related hazards and assessment of exposure and sensitivity are informed by high emissions climate scenarios

Risk identification is based on IPCC scenarios, including SSP5-RCP8.5, SSP3-RCP7.0, SSP2-RVP4.5, and SSP1-RCP2.6, ensuring analysis under various climate conditions.

## Transition events have been identified over short-, medium- and long-term time horizons

Transition events such as carbon pricing, legal mandates, and market shifts are assessed with a primary focus on medium- (2030) and long-term (2050) horizons, using IEA's Net Zero scenario for likelihood evaluation.

### Undertaking has screened whether assets and business activities may be exposed to transition events

Exposure screening includes sectoral impacts of carbon pricing and decarbonization on raw materials like aluminium, steel, and plastic. Impacts on Canyon's financial performance and supply chain were evaluated.

### Extent to which assets and business activities may be exposed and are sensitive to identified transition events has been assessed

Sensitivity to transition risks, including rising raw material costs, was evaluated based on the materials' share in Canyon's operations and projected price increases under deep decarbonization scenarios.

### Identification of transition events and assessment of exposure has been informed by climate-related scenario analysis

Scenario analysis using IEA's Net Zero scenario provided insights into the likelihood and magnitude of transition risks, such as carbon pricing and decarbonization impacts, informing Canyon's evaluations.

### Assets and business activities that are incompatible with or need significant efforts to be compatible with transition to climate-neutral economy have been identified

Key materials (aluminium, steel, plastic, and rubber) were identified as requiring relevant adjustments to align with net-zero goals due to expected cost increases and supply constraints under a decarbonization scenario.

### Explanation of how climate scenarios used are compatible with critical climate-related assumptions made in financial statements

Canyon conducted scenario analyses yearly by decade from 2020 to 2090 using IPCC scenarios, allowing the identification of chronic and acute hazards and their impacts on operations over varying time horizons.

## 7.4.3.2.4 Policies to manage its material impacts, risks and opportunities related to climate change mitigation and adaptation

### Description of key contents of policy

The Canyon Climate Transition Plan addresses all material impacts, risks and opportunities related to climate change. The transition plan aims to reduce Canyon's greenhouse gas emissions. This also contributes to global climate protection goals and thus also addresses identified acute physical risks such as operational disruptions and infrastructure damage caused by cyclones, hurricanes or typhoons. In addition, chronic physical risks from long-term temperature fluctuations that can affect productivity and supply chains are addressed. Market risks, including rising raw material costs, as well as potential sales declines due to material shortages due to increasing demand for low-carbon technologies such as batteries for electric bicycles, are also covered. The goal of the climate transition plan is to systematically reduce Canyon's greenhouse gas emissions and align its business operations with global climate goals, specifically limiting global warming to 1.5°C above pre-industrial levels, as outlined in the Paris Agreement. Ultimately, the climate transition plan aims to balance environmental responsibility with economic growth, safeguarding the company's future in a rapidly changing regulatory and market environment. The overall goal of reducing emissions is also to minimize the negative impacts of climate change on flora, fauna and humans.

#### The Transition Plan covers the following aspects:

Carbon accounting is conducted annually, following the GHG Protocol standard to measure and record the company's carbon footprint. This enables Canyon to track its emissions across all Scopes, providing a foundation for strategic decision-making and climate action. The content of the transition plan is monitored by the ESG Department. Progress and changes of the plan are presented to the Advisory Board. This includes in particular the status of annual emissions and progress towards the set targets.

Canyon has established science-based targets to guide its emissions reduction. These targets, explained in further detail below, set clear near-term and long-term goals for reducing carbon emissions and thus aligning the company's actions with the broader climate objectives of the Paris Agreement. In line with these targets, Canyon is implementing value chain engagement and low-carbon initiatives. Engagement across the value chain encompasses various initiatives, including the Climate Action Trainings and general dialogues with suppliers to encourage the establishment of climate targets. Additionally, this effort includes the development of a supplier engagement program aimed at driving sustainability. These initiatives are evaluated on a project-by-project basis, with cross-functional collaboration between the ESG department and other departments to identify and implement effective measures.

As part of its broader strategy and risk management process, Canyon conducts a thorough assessment of im-pacts, risks and opportunities related to climate change. Tools used to identify risks and opportunities include the WWF Risk Filter, which evaluates water-related risks (e.g. water scarcity, quality, and flooding) alongside broader physical risks like extreme heat, fire hazards, and landslides. For transition risks, Canyon uses the IEA Net Zero Emissions 2050 scenario and the Transition Pathway Initiative to evaluate future risks and opportunities.

These assessments apply a 2030-time horizon, with the High SSP5-RCP8.5 scenario projecting a potential temperature rise of 3.3-5.7°C by 2100, supported by data from the S&P Global Sustainable 1 Climate Change Physical Risk Dataset.

Policy engagement is another pillar of Canyon's climate strategy. Canyon collaborates with industry associations and civil society organizations, provides feedback on standards, and works to ensure its policies are consistent with climate science. This includes working with Shift Cycling Culture and other brands in the industry to develop the Climate Action Trainings. Collaboration and exchange with Canopy, the Bicycle Industry Association ('Zweirad-Industrie-Verband') and the World Federation of the Sporting Goods Industry.

Financial planning is integrated into the company's climate transition efforts. The financial impacts of low-carbon initiatives and climate-related risks are evaluated within the respective departments that initiate these projects. However, while financial assessments are conducted, there is not yet a holistic financial review or consolidation of the entire climate transition plan. This leaves room for future development in fully integrating financial planning with climate strategy.

Together, the above elements form a cohesive framework that ensures Canyon is not only aware of its climate risks but is actively working to manage the risks and to reduce its carbon footprint, engage its value chain, and position itself for long-term greenhouse gas reduction. The climate transition plan is company-wide and covers actions in all areas of climate change mitigation, adaptation to climate change, energy efficiency and the use of renewable energies. The Scope and extent of the measures may vary annually.

## Description of scope of policy or of its exclusions

The climate transition plan is company-wide and covers actions in all areas of climate change mitigation, adaptation to climate change, energy efficiency and the use of renewable energies.

## Description of most senior level in organisation that is accountable for implementation of policy

Given the Advisory Board's responsibility for the company's strategic direction (For further information, please refer to Chapter G1 Business Conduct), particularly in relation to ESG matters, the Advisory Board plays a central role in overseeing Canyon's climate transition plan and is embedded in an ESG governance structure described in Governance information: Business conduct.

## Disclosure of third-party standards or initiatives that are respected through implementation of policy

Canyon aligns its climate transition plan with internationally recognized standards and initiatives to ensure a transparent and effective climate strategy. Canyon adheres to the Greenhouse Gas Protocol for measuring and reporting its greenhouse gas emissions across Scope 1, 2, and 3, ensuring that the carbon footprint is both transparent and comparable. Additionally, Canyon has committed to setting emissions reduction targets in accordance with the Science-Based Targets initiative to ensure they align with the latest scientific findings and the goals of the Paris Agreement. Furthermore, Canyon follows the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) to systematically identify climate-related risks and integrate them into its financial and risk management processes. By adhering to these established standards, Canyon strengthens its sustainability strategy and contributes effectively to global climate action.

## Description of consideration given to interests of key stakeholders in setting policy

*See Description of key contents of policy*

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

The transition plan has been disclosed through the CDP platform and will be available for the public in 2025. Defined elements of the policy are shared with suppliers in the value chain and the Climate Action Training facilitate the creation of a level playing field across different suppliers and regions.

## Sustainability matters addressed by policy for climate change

The organization's climate change policy comprehensively addresses critical sustainability matters to mitigate risks, and align with international climate goals. A core focus is on reducing greenhouse gas emissions through ambitious targets, including long-term commitments to achieve net-zero emissions. To support this, the organization prioritizes improvements in energy efficiency across operations and actively transitions to renewable energy sources, including green electricity procurement and on-site renewable energy generation. Circular economy initiatives are integrated into the policy to minimize resource use, promote recycling, and reduce waste. The organization aligns its efforts with international agreements such as the Paris Agreement, reinforcing its commitment to global climate action.

To ensure transparency and accountability, the policy incorporates frameworks such as the Task Force on Climate-related Financial Disclosures (TCFD) and the EU Taxonomy for sustainable activities. It addresses both transition risks, such as regulatory changes and carbon pricing, and physical risks, including climate-related hazards like floods and droughts. Market and reputation risks are also considered.

By embedding these considerations into its climate change policy, Canyon aims to build resilience, drive sustainable growth, and contribute meaningfully to the transition to a low-carbon economy.

## 7.4.3.2.5 Actions and Resources related to climate change mitigation and adaptation

### Disclosure of key action

All actions aim to reduce Canyon's greenhouse gas emissions. This also contributes to global climate protection goals and thus also addresses identified acute physical risks such as operational disruptions and infrastructure damage caused by cyclones, hurricanes or typhoons. In addition, chronic physical risks from long-term temperature fluctuations that can affect productivity and supply chains are addressed. Market risks, including rising raw material costs, as well as potential sales declines due to material shortages due to increasing demand for low-carbon technologies such as batteries for electric bicycles, are also covered.

#### Industry Climate Action Trainings

Canyon was a key initiator for the development of industry climate action training. In November 2022, Canyon attended the first Shift Cycling Culture Barcamp in Amsterdam and shared a Call to Action with attendees from the bike industry to develop jointly a Climate Action Training. Actors from the USA, Netherlands, Germany and Switzerland came together to co-develop the training with the support of the GIZ, Initiative for Global Solidarity, Shift Cycling Culture and facilitating service providers.

The course is free of charge, and targeted at top management and technical mid-management at factories to raise awareness on their critical role in achieving a net-zero cycling world. The training provides foundational knowledge on measuring and reporting greenhouse gas emissions, how to set reduction targets and monitor progress, as well as relevant case studies of potential solutions to drive down emissions. The open-source Climate Action Training was launched in Q4/2024. All companies in the cycling sector are invited to use this course to engage and collaborate with suppliers, and to catalyse climate action and establishing a level playing field across the industry (https://www.shiftcyclingculture.com/cat). The Climate Action Training is designed with an open-end format, allowing participants to start and complete the program at their own pace. This flexibility accommodates varying schedules and ensures accessibility for all participants.

The Climate Action Training is available globally, engaging suppliers and stakeholders across diverse regions to promote a unified approach to sustainability. The program incorporates integrated self-assessments and interactive components, enabling participants to evaluate their current practices, identify gaps, and measure progress over time. This method addresses regional differences while driving collaborative progress and delivering tangible outcomes. By aligning stakeholders and regions through this training, CAT fosters collective action to reduce the cycling industry's environmental impact while enhancing innovation and advancing sustainable business practices.

Quantifying the emission reduction linked to this program at this stage would depend on too many variables but addressing supply chain emissions and facilitating substantial knowledge transfer are crucial for overcoming obstacles and accelerating decarbonization efforts. Canyon expects to specifically engage with third party assemblers and Canyon Engineered Parts suppliers based in Asia within the next 2 years. However, the training courses will definitely continue and have an open time frame so that potential new suppliers can also complete the training. Besides the emission reduction KPI, workers covered in the supply chain also play a crucial part.

#### Material Working Groups

In 2024, Canyon established Material Working Groups composed of experts from various specialist departments. These groups are tasked with developing and accessing decarbonization strategies, with a primary focus on key materials such as aluminium, plastics, and composites. An additional group is addressing packaging, encompassing both input materials and holistic packaging solutions. The groups have a facilitating character. Various potential measures were discussed and evaluated within the working groups. These include, for example, the potential use of recycled aluminum for some components or the revision of internal packaging guidelines, the evaluation of incoming packaging materials or general potential for improvement in the area of composite materials.

Actions arising from the working groups will be evaluated on a case-by-case basis. Financial and greenhouse gas emission reduction potentials will be assessed in parallel, in collaboration with other departments. Projects are selected using a holistic approach by considering e.g. cost, reduction potential, time horizon and available resources, including related trade-offs. Canyon envisions that the working groups will support the transition to net-zero in the long term, to account for a fast-changing environment.

#### Company Car Policy

Efforts to reduce Scope 1 emissions are focused on converting Canyon's company cars from internal combustion engines (ICE) to battery electric vehicles (BEV) and plug-in hybrid vehicles (PHEV). The vehicle fleet contributes approximately 50% of Canyon's total Scope 1 and 2 emissions, prompting a revision of the company's internal car policy to support this transition. The reduction cannot currently be quantified with 100% certainty, but the maximum expected reduction is 35% related to the entire Scope 1 and 2 emissions. Difficulties in the assessment arise due to technological developments and the time horizon of leasing agreements: The leasing contracts of the cars do not expire at the same time and the policy comes into force successively. The policy will come into effect in 2024 and has no limited term as it applies to all new leasing contracts.

Upcoming Activities:

### Supplier Engagement Program

The Climate Action Trainings aim to facilitate knowledge sharing on the topics of carbon accounting and target setting, to identify emission hotspots and steer emission reduction in alignment with set targets. The collaborative involvement of suppliers is key to further effectively reduce Scope 3 emissions.

A holistic and formalized supplier engagement program for decarbonization is a strategic initiative that aims to work with suppliers to reduce greenhouse gas emissions along the entire supply chain. It must be developed in the short term. Due to the relevance of Scope 3 emissions, especially category 1, Canyon plans to start developing the supplier engagement program in 2025. The time frame of the program will not be limited. After development, the program must be followed up on, and implementation and progress shall be monitored based on net zero targets for 2050.

- Such a program typically begins with a carbon footprint assessment, where suppliers are encouraged to measure and report their emissions, particularly those contributing to the company's Scope 3 emissions. This step creates a foundation for informed decision-making and aligns with standardized frameworks like the GHG Protocol.
- Once emissions are quantified, the next step involves working with suppliers to establish science-based emissions reduction targets. These targets should align with both global climate goals, such as the Paris Agreement, and the company's own decarbonization objectives. This alignment ensures a coordinated approach to reducing emissions throughout the supply chain.
- As a next step, emission reduction measures should be implemented to reach set targets.

To support suppliers in achieving the above steps, the program provides capacity building and training. The focus here is on the suppliers who are involved in the production of the bicycles and who account for a relevant share of the Scope 3 category 1 emissions.

This includes offering resources (like the Climate Action Trainings), tools, and workshops to help suppliers implement energy efficiency measures, adopt renewable energy sources, and explore low-carbon technologies. Collaboration and innovation are also key elements of the program, encouraging suppliers to work alongside Canyon in developing innovative solutions to reduce emissions. This may involve redesigning products, optimizing logistics, or sourcing alternative materials with a reduced carbon footprint, delivering mutual benefits to both parties.

In order to ensure accountability, the program should include performance monitoring and reporting, with regular evaluations of suppliers' progress towards their decarbonization goals. This creates transparency and facilitates continuous improvement, helping the company and its suppliers stay aligned on emissions reduction targets.

Finally, the program may offer incentives and recognition to suppliers that demonstrate relevant progress in reducing emissions. This could take the form of preferential procurement, long-term contracts, or public recognition for sustainability achievements.

## Description of scope of key action

*See Disclosure of key action*

## Time horizon under which key action is to be completed

*See Disclosure of key action*

## Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

*See Disclosure of key action*

## Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

*See Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan*

### Disclosure of the type of current and future financial and other resources allocated to the action plan

*See Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan*

### Current financial resources allocated to action plan (Capex)

*See Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan*

### Current financial resources allocated to action plan (Opex)

*See Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan*

### Future financial resources allocated to action plan (Capex)

*See Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan*

### Future financial resources allocated to action plan (Opex)

*See Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan*

### Decarbonisation lever type

*See Disclosure of key action*

### Expected and achieved GHG emission reductions

*See Disclosure of key action*

### Explanation of relationship of significant CapEx and OpEx required to implement actions taken or planned to relevant line items or notes in financial statements

*See Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan*

### Explanation of relationship of significant CapEx and OpEx required to implement actions taken or planned to key performance indicators required under Commission Delegated Regulation (EU) 2021/2178

*See Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan*

### Explanation of relationship of significant CapEx and OpEx required to implement actions taken or planned to CapEx plan required by Commission Delegated Regulation (EU) 2021/2178

*See Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan*

### Explanation of extent to which ability to implement action depends on availability and allocation of resources

*See Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan*

## 7.4.3.2.6 Targets related to GHG emissions reduction

### Disclosure of how GHG emissions reduction targets and (or) any other targets have been set to manage material climate-related impacts, risks and opportunities

Canyon has set near-term and long-term goals for reducing greenhouse gas (GHG) emissions, aligned with limiting global warming to 1.5°C. Both targets were validated by the Science-Based Target initiative (SBTi). In the near-term, Canyon commits to reducing absolute Scope 1 and 2 GHG emissions by 51% by 2032, with a 2022 base year. Additionally, the company aims to lower Scope 3 emissions by 58.2% per bicycle produced within the same timeframe. For its net-zero target by 2050, Canyon plans to reduce absolute Scope 1 and 2 GHG emissions by 90%, and Scope 3 emissions per bicycle by 97%, both compared to the 2022 baseline. This translates into specific reduction targets: for Scope 1 and 2 emissions, from 751 t $CO_2e$ in 2022 to 368 t $CO_2e$ by 2032, and to 75 t $CO_2e$ by 2050. For Scope 3 emissions per bicycle, the goal is to decrease from 0.46 t $CO_2e$ in 2022 to 0.19 t $CO_2e$ by 2032, and to just 0.01 t $CO_2e$ by 2050. No separate interim target has been defined for 2030, as this is in line with the reduction target for 2032. Progress towards the targets is monitored annually as part of the corporate carbon footprint calculation, which is done in accordance with the GHG Protocol. Annual monitoring includes whether progress is in line with the plan and an analysis of trends or relevant changes in Canyon's performance against the targets. When setting climate targets through the Science Based Targets initiative (SBTi), all required criteria were met. This includes ensuring that the base year is representative and not influenced by external or internal factors. In the event of relevant changes, the base year must be adjusted accordingly. Canyon adheres to the SBTi's definition of significance, which is defined as a cumulative change of five percent or more in total emissions for the base year. This includes structural changes, modifications in calculation methods, timeline, data errors, or other relevant changes.

### Explanation of how consistency of GHG emission reduction targets with GHG inventory boundaries has been ensured

Both the short-term and net zero targets cover all emissions determined under the Scope 1&2 target and the Scope 3 target.

### GHG emission reduction target is science based and compatible with limiting global warming to one and half degrees Celsius

Both targets were validated by the Science-Based Target initiative (SBTi) and compatible with limiting global warming to 1,5° C.

### Description of expected decarbonisation levers and their overall quantitative contributions to achieve GHG emission reduction target

In order to achieve these targets, Canyon conducted workshops across various departments to identify and evaluate measures. A key step for reducing Scope 1 emissions is transitioning the company's vehicle fleet from internal combustion engines (ICE) to battery electric (BEV) and plug-in hybrid (PHEV) vehicles, which currently account for around 50% of Scope 1 and 2 emissions. The company is in the process of revising its internal car policy to support this shift. Additionally, the potential switch from natural gas to biogas for heating is being considered and will be further evaluated in the coming years. Canyon sourced around 90% of its electricity in the past from renewable sources, with plans to further increase this share. The majority of Scope 3 emissions falls under category 1, which relates to the materials used in bike production, including packaging and accessories. As a result, Canyon is focusing on optimizing material usage. Measures developed and assessed include increasing the use of recycled materials, particularly for aluminium and various plastics, and exploring the use of low-carbon aluminium. Canyon is also assessing new business models that could reduce reliance on new materials (whether recycled or virgin) and aim to extend the lifespan of products. This is expected to support the mitigation of the raw material price increase risk. These business models would reduce the sourcing of new materials and lead to an extended re-use phase. A key part of Canyon's strategy involves engaging with suppliers to collaboratively reduce material impacts. This includes assessing the current situation, sharing knowledge, working on joint reduction measures, and involving the deeper supply chain. Although packaging represents only a small portion of category 1 emissions, Canyon is committed to increasing the use of recycled materials and eliminating single-use plastics. In support of these goals, material working groups have been established to develop decarbonization measures, particularly for aluminium and carbon fiber, including evaluating the use of recycled or low-carbon alternatives. To achieve the objectives and evaluate the measures, aspects of climate scenario analysis, in particular transition risk scenarios, are also taken into account (see AR9 and AR12).

### Description of how it has been ensured that baseline value is representative in terms of activities covered and influences from external factors

When setting climate targets through the Science Based Targets initiative (SBTi), all required criteria were met. This includes ensuring that the base year is representative and not influenced by external or internal factors. In the event of relevant changes, the base year must be adjusted accordingly. Canyon adheres to the SBTi's definition of significance, which is defined as a cumulative change of five percent or more in total emissions for the base year. This includes structural changes, modifications in calculation methods, timeline, data errors, or other relevant changes.

### Description of how new baseline value affects new target, its achievement and presentation of progress over time

*See Description of how it has been ensured that baseline value is representative in terms of activities covered and influences from external factors*

### Diverse range of climate scenarios have been considered to detect relevant environmental, societal, technology, market and policy-related developments and determine decarbonisation levers

For further information, please refer to Description of the process to identify and assess material impacts, risks and opportunities

### Disclosure of past progress made in meeting target before current base year

N/A

### Tracking effectiveness of climate change policies and actions through targets

Canyon has set near-term and long-term goals for reducing greenhouse gas (GHG) emissions, aligned with limiting global warming to 1.5°C. Both targets were validated by the Science-Based Target initiative (SBTi). In the near term, Canyon commits to reducing absolute Scope 1 and 2 GHG emissions by 51% by 2032, with a 2022 base year. Additionally, the company aims to lower Scope 3 emissions by 58.2% per bicycle produced within the same timeframe. For its net-zero target by 2050, Canyon plans to reduce absolute Scope 1 and 2 GHG emissions by 90%, and Scope 3 emissions per bicycle by 97%, both compared to the 2022 baseline. Progress towards the targets is monitored annually as part of the corporate carbon footprint calculation, which is done in accordance with the GHG Protocol. Annual monitoring includes whether progress is in line with the plan and an analysis of trends or relevant changes in Canyon's performance against the targets.

## 7.4.3.2.7 Target 1

### Relationship with policy objectives

Canyon's science-based goal is to reduce greenhouse gas emissions and thereby also address identified acute physical risks such as operational disruptions and infrastructure damage caused by cyclones, hurricanes or typhoons or chronic physical risks caused by long-term temperature fluctuations. To minimize the global risks associated with climate change, the science-based targets of the Canyon climate transition plan are an essential component. Canyon has set near-term and long-term goals for reducing greenhouse gas (GHG) emissions, aligned with limiting global warming to 1.5°C. Both targets were validated by the Science-Based Target initiative (SBTi). In the near term, Canyon commits to reducing absolute Scope 1 and 2 GHG emissions by 51% by 2032, with a 2022 base year. Additionally, the company aims to lower Scope 3 emissions by 58.2% per bicycle produced within the same timeframe. [...] Progress towards the targets is monitored annually as part of the corporate carbon footprint calculation, which is done in accordance with the GHG Protocol. Annual monitoring includes whether progress is in line with the plan and an analysis of trends or relevant changes in Canyon's performance against the targets.

### Measurable target

In the near term, Canyon commits to reducing absolute Scope 1 and 2 GHG emissions by 51% by 2032, with a 2022 base year. Additionally, the company aims to lower Scope 3 emissions by 58.2% per bicycle produced within the same timeframe.

### Nature of target

The scope 1&2 target represents an absolute target, while the scope 3 target is a relative target.

### Description of scope of target

Both the Scope 1&2 and Scope 3 targets are company-wide targets.

### Baseline value

By 2032, Scope 1 and 2 emissions are set to decrease from 751 t $CO_2e$ in 2022 to 368 t $CO_2e$. Scope 3 emissions per bicycle aim to drop from 0.46 t $CO_2e$ in 2022 to 0.19 t $CO_2e$

### Baseline year

2022

### Period to which target applies

*See Relationship with policy objectives*
*See Baseline value*

### Indication of milestones or interim targets

*See Relationship with policy objectives*

### Description of methodologies and significant assumptions used to define target

*See Relationship with policy objectives*

### Target related to environmental matters is based on conclusive scientific evidence

*See Relationship with policy objectives*

### Disclosure of how stakeholders have been involved in target setting

N/A

### Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data

N/A

### Description of performance against disclosed target

*See Relationship with policy objectives*

## 7.4.3.2.8 Target 2

### Relationship with policy objectives

Canyon's science-based goal is to reduce greenhouse gas emissions and thereby also address identified acute physical risks such as operational disruptions and infrastructure damage caused by cyclones, hurricanes or typhoons or chronic physical risks caused by long-term temperature fluctuations. To minimize the global risks associated with climate change, the science-based targets of the Canyon climate transition plan are an essential component. Canyon has set near-term and long-term goals for reducing greenhouse gas (GHG) emissions, aligned with limiting global warming to 1.5°C. Both targets were validated by the Science-Based Target initiative (SBTi). [...] For its net-zero target by 2050, Canyon plans to reduce absolute Scope 1 and 2 GHG emissions by 90%, and Scope 3 emissions per bicycle by 97%, both compared to the 2022 baseline. Progress towards the targets is monitored annually as part of the corporate carbon footprint calculation, which is done in accordance with the GHG Protocol. Annual monitoring includes whether progress is in line with the plan and an analysis of trends or relevant changes in Canyon's performance against the targets.

### Measurable target

*See Relationship with policy objectives*

### Nature of target

The scope 1&2 target represents an absolute target, while the scope 3 target is a relative target.

### Description of scope of target

Both the Scope 1&2 and Scope 3 targets are company-wide targets.

### Baseline value

Scope 1 and 2 emissions are targeted to fall from 751 t $CO_2e$ to 75 t $CO_2e$ by 2050. Scope 3 emissions per bicycle produced are expected to decrease significantly from 0.46 t $CO_2e$ to 0.01 t $CO_2e$

### Baseline year

2022

## Period to which target applies

*See Relationship with policy objectives*
*See Baseline value*

## Indication of milestones or interim targets

*See Relationship with policy objectives*

## Description of methodologies and significant assumptions used to define target

*See Relationship with policy objectives*

## Target related to environmental matters is based on conclusive scientific evidence

*See Relationship with policy objectives*

## Description of performance against disclosed target

*See Relationship with policy objectives*

### 7.4.3.2.9 Energy consumption and mix

## Total energy consumption related to own operations

4,560.00 MWh

## Total energy consumption from activities in high climate impact sectors

16,414.00 GJ

## Energy consumed, by source

| energy Source | Total amount of energy consumed from energy source (MWh) | Percentage of total energy consumption |
|---|---|---|
| Fossil sources | 2,498.00 | 55.00 |
| Nuclear sources | 0.00 | 0.00 |
| Renewable sources | 2,061.00 | 45.00 |

## Fuel consumed, by source

| Fuel Source | Total fuel MWh consumed by the organization | Percentage of fuel type consumed |
|---|---|---|
| Fuel consumption from renewable sources | 123.00 | 3.00 |
| Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources | 1,545.00 | 34.00 |
| Consumption of self-generated non-fuel renewable energy | 392.00 | 9.00 |
| Fuel consumption from coal and coal products | 0.00 | 0.00 |
| Fuel consumption from crude oil and petroleum products | 1,356.00 | 30.00 |
| Fuel consumption from natural gas | 767.00 | 17.00 |
| Fuel consumption from other fossil sources | 0.00 | 0.00 |
| Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources | 375.00 | 8.00 |

## 7.4.3.2.10 GHG emissions intensity

### Energy intensity from activities in high climate impact sectors (total energy consumption per net revenue)

5.82E-06 MWh/reporting currency

### High climate impact sectors used to determine energy intensity

NACE 30.92 Manufacture of bicycles and invalid carriages

### Disclosure of reconciliation to relevant line item or notes in financial statements of net revenue from activities in high climate impact sectors

Revenue reported in financial statements: 784,057,390 EUR

Adjustments: N/A

Net revenue for GHG emissions intensity calculation: 784,057,390 EUR

## 7.4.3.2.11 GHG emissions intensity

| GHG emissions intensity | GHG emissions intensity (per net revenue) $tCO_2e$ |
|---|---|
| Scope 1 | 6.68E-07 |
| Scope 2 (market-based) | 1.25E-07 |
| Scope 2 (location-based) | 1.20E-06 |
| Scope 3 | 1.25E-04 |

### Net revenue

784,057,390.00 EUR

### Net revenue used to calculate GHG intensity

784,057,390.00 EUR

## 7.4.3.2.12 Energy generation

### Non-renewable energy generation, by energy type

| Energy type | Gross generation |
|---|---|
| Nuclear | 0.00 |
| Coal | 0.00 |
| Natural gas | 767.00 |
| Other non-RE | 1,258.00 |
| Total non-renewables | 2,123.00 |
| Oil | 98.00 |

### Renewable energy generation, by energy type

| Energy type | Gross generation |
|---|---|
| Total renewables | 693.00 |
| Other RE, please specify: | 0.00 |
| Wind | 0.00 |
| Solar | 569.00 |
| Hydro | 0.00 |
| Geothermal | 0.00 |
| Wave tidal | 0.00 |
| Biomass | 123.00 |

## 7.4.3.2.13 GHG emissions - Scope 1

### Gross global Scope 1 emissions: Location

524.00 t $CO_2e$

### Gross global Scope 1 emissions: Market

524.00 t $CO_2e$

### Scope 1 emissions - financial and operational control

524.00 t $CO_2e$

### Disclosure of methodologies, significant assumptions and emissions factors used to calculate or measure GHG emissions

Canyon's Scope 1 emissions include fuel used by company cars and fuel used to heat buildings. Emission factors from the internationally-recognised ecoinvent database are used.

## 7.4.3.2.14 GHG emissions - Scope 2

### Indirect GHG Emissions: Location

939.00 t $CO_2e$

### Indirect GHG Emissions: Market

98.00 t $CO_2e$

### Scope 2 emissions - financial and operational control

98.00 t $CO_2e$

### Disclosure of methodologies, significant assumptions and emissions factors used to calculate or measure GHG emissions

Canyon's Scope 2 (location-based) emissions include purchased electricity and heat. Emission factors used are from ecoinvent. Market-based emissions include purchased electricity and heat. The market-based approach uses supplier-specific emission factors if available. Otherwise, emission factors from the internationally-recognised ecoinvent database are used.

## Contractual instruments

### Percentage of contractual instruments, Scope 2 GHG emissions

89.00 %

### Disclosure of types of contractual instruments, Scope 2 GHG emissions

Canyon uses supply contracts with an electricity supplier to purchase green electricity.

### Percentage of contractual instruments used for sales and purchase of energy bundled with attributes about energy generation in relation to Scope 2 GHG emissions

89.00 %

### Percentage of contractual instruments used for sales and purchase of unbundled energy attribute claims in relation to Scope 2 GHG emissions

0.00 %

### Disclosure of types of contractual instruments used for sales and purchase of energy bundled with attributes about energy generation or for unbundled energy attribute claims

The contractual instrument used for the purchase of renewable electricity based on unbundled energy attribute certificates (EACs).

## 7.4.3.2.15 GHG emissions - Scope 3

### 1. Purchased goods and services

58,055.00 t $CO_2e$

### 2. Capital goods

976.00 t $CO_2e$

### 3. Fuel- and energy related activities (not included in scope 1 or scope 2)

151.00 t $CO_2e$

### 4. Upstream transportation and distribution

30,860.00 t $CO_2e$

### 5. Waste generated in operations

85.00 t $CO_2e$

### 6. Business travel

761.00 t $CO_2e$

### 7. Employee commuting

2,069.00 t $CO_2e$

### 8. Upstream leased assets

N/A

### 9. Downstream transportation and distribution

N/A

### 10. Processing of sold products

N/A

### 11. Use of sold products

3,469.00 t $CO_2e$

### 12. End-of-life treatment of sold products

1,413.00 t $CO_2e$

### 13. Downstream leased assets

N/A

### 14. Franchises

N/A

### 15. Investments

N/A

### Total other indirect GHG emissions (Scope 3 based-figure)

97,839.00 t $CO_2e$

### Scope 3 emissions - financial and operational control

97,839.00 t $CO_2e$

### Percentage of GHG Scope 3 calculated using primary data

1.00 %

### Disclosure of reporting boundaries considered and calculation methods for estimating Scope 3 GHG emissions

The calculation was performed in accordance with the GHG Protocol and includes all applicable categories. The calculation was performed by collecting inventory data and using the Umberto life cycle assessment software, which uses emission factors from the ecoinvent database. The calculation boundaries cover all company activities and consider all Canyon locations and all applicable Scope 3 categories.

#### Category 1

Canyon defined reference bicycles to determine the impact of the portfolio. Representative bicycles from the road, MTB and urban categories were selected and a distinction was made between frames made of aluminium or carbon, and e-bikes or push-bikes. For the reference bikes, all relevant components such as frames, drives, forks, wheels, saddles, pedals, cockpits, handlebars, batteries and motors for e-bikes and other small attachments were used to achieve the real bike weight. The materials or material compositions used for the respective components were determined and assigned to the component weights. The material information was then assigned to emission factors from the ecoinvent database. In order to cover the entire portfolio, the component composition of the reference bikes was scaled to the other models based on the total bike weight.

#### Category 2

Activity data was taken from Canyon's procurement systems in EUR, differentiated according to cost types such as computer systems, software, office furniture, technical systems and machines, and others. Emission factors are based on Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities from US EPA.

### Category 3

The activity data is based on the amount and types of energy carriers, which are considered in Scopes 1&2. Emission factors used are from ecoinvent.

### Category 4

Canyon differentiates upstream transportation and distribution emissions into inbound and outbound logistics. The same methodology is applied to both. Data on the transportation of our purchased goods, including transport mode, weight and distance data, was compiled for each region from our internal systems. Ecoinvent-specific transportation emission factors are combined with the respective transportation mode and the transported mass and distance. The same method is applied for transportation and distribution of sold products from the point of sale to the customer. Transportation of final products including transport mode, weight and distance data was compiled for each region from our internal systems. Ecoinvent-specific transportation emission factors are combined with the respective transportation mode, and the transported mass and distance.

### Category 5

Emissions from waste currently generated in operations is calculated using the average-data method based on waste type, volume and disposal methods, with data collected from our production sites. Emission factors: average emission factors of different disposal methods from ecoinvent are applied.

### Category 6

Canyon's greenhouse gas emissions from business travel result primarily from three different travel categories: air, rental car or train. The distances covered for flights are determined by publicly-available flight distance calculators, and the start and destination locations. For rental cars, an average distance of 160 km per day is assumed. To calculate the greenhouse gas emissions, transport-specific emission factors (plane, car, rail) from ecoinvent were used.

### Category 7

Regional employee numbers were provided by Canyon's People department. Emissions were estimated based on regional average commuting modes, applying emission factors from ecoinvent specific to each commuting mode.

### Category 8

Canyon does not lease its assets for third-party operational control.

### Category 9

Due to Canyon's 'direct-to-consumer' business, this category does not apply. Outbound logistics is completely covered within category 4 upstream transportation.

### Category 10

Canyon only sells finished products, so no further processing steps are necessary.

### Category 11

Based on the sales countries, an electricity consumption of 200 kWh per life-time use was assumed for the e-bikes and the country-specific electricity emission factor from the ecoinvent database was taken into account.

### Category 12

Within the end-of-life of sold products, a distinction is made between packaging, accessories and bicycles. Activity data for calculating the end-of-life emissions of the packaging are weights of different packaging materials, which are also used for the calculation within "Purchased goods and services". Generic material-specific end-of-life emission factors from the ecoinvent database with average disposal scenarios (landfill, incineration, recycling) are used to calculate the emissions. Emissions from accessories are calculated using activity data on the total weight of products sold and generic end-of-life emission factors from the ecoinvent database of average disposal scenarios (landfill, incineration, recycling). Emissions from bicycles are calculated using activity data on the number of bicycles produced and bicycle-specific end-of-life emission factors from the ecoinvent database. Since the emission factor is based on average bike weight, the emission factor is scaled using the specific model weights to better account for both lighter and heavier bikes and their material composition.

### Category 13

Canyon does not lease any downstream assets.

### Category 14

Canyon has no franchised businesses or assets.

### Category 15

Canyon has no investment in other businesses.

#### Disclosure of why Scope 3 GHG emissions category has been excluded

No Scope 3 categories are excluded, whereas some categories are simply not applicable (see Disclosure of reporting boundaries considered and calculation methods for estimating Scope 3 GHG emissions).

#### List of Scope 3 GHG emissions categories included in inventory

*See Disclosure of reporting boundaries considered and calculation methods for estimating Scope 3 GHG emissions*

#### Disclosure of methodologies, significant assumptions and emissions factors used to calculate or measure GHG emissions

*See Disclosure of reporting boundaries considered and calculation methods for estimating Scope 3 GHG emissions*

#### Gross Scope 3 greenhouse gas emissions in metric tonnes of $CO_2$eq

97,839.00 t $CO_2$e

#### Scope 3 GHG emissions (GHG Protocol)

97,839.00 t $CO_2$e

#### Scope 3 GHG emissions (ISO 14064-1)

Not applicable, since Canyon is calculating the emissions according to GHG Protocol.

## 7.4.3.2.16 Alternative breakdown emissions

### GHG emissions, by country

| Country | GHG emissions (t $CO_2$e) |
|---|---|
| Germany | 97,863.00 |
| United States | 226.00 |
| Belgium | 50.00 |
| Spain | 35.00 |
| Australia | 15.00 |
| Finland | 43.00 |
| South Korea | 11.00 |
| Japan | 5.00 |
| Italy | 29.00 |
| Netherlands | 114.00 |
| United Kingdom | 65.00 |
| Singapore | 5.00 |

### GHG emissions, by subsidiary

| Subsidiary | GHG emissions (t $CO_2e$) |
|---|---|
| Canyon GmbH | 97,863.00 |
| Canyon US | 226.00 |
| Canyon Belgium | 50.00 |
| Canyon Iberia | 35.00 |
| Canyon Bicycles Australia & New Zealand | 15.00 |
| Canyon Finland | 43.00 |
| Canyon Japan | 20.00 |
| Canyon Italy | 29.00 |
| Canyon Nederland | 114.00 |
| Canyon UK | 65.00 |

### GHG emissions, by GHG category

| GHG category | GHG emissions (t $CO_2e$) |
|---|---|
| $N_2O$ | 1.00 |
| $SF_6$ | 0.00 |
| PFCs | 0.00 |
| $NF_3$ | 0.00 |
| $CH_4$ | 2.00 |
| $CO_2$ | 521.00 |
| HFCs | 0.00 |

### GHG emissions, by source type

| Source type | GHG emissions (t $CO_2e$) |
|---|---|
| Process emissions | 0.00 |
| Stationary combustion | 201.00 |
| Fugitive emissions | 0.00 |
| Mobile combustion | 323.00 |

## 7.4.3.2.17 Total GHG emission

### Total GHG emissions (Scope 1 (L) + Scope 2 (L) + Scope 3 (L))

99,302.00 t $CO_2e$

### Total GHG emissions (Scope 1 (L) + Scope 2 (M) + Scope 3 (L))

98,460.00 t $CO_2e$

### Total GHG emissions - financial and operational control

98,460.00 t $CO_2e$

## 7.4.3.2.18 Change in emissions reporting in the fiscal year

### Disclosure of significant changes in definition of what constitutes reporting undertaking and its value chain and explanation of their effect on year-to-year comparability of reported GHG emissions

Canyon adheres to the SBTi's definition of significance, which is defined as a cumulative change of five percent or more in total emissions for the base year. This includes structural changes, modifications in calculation methods, timeline, data errors, or other relevant changes. If such cases occur the base year value needs to be adapted according to the GHG protocol.

### Disclosure of the effects of significant events and changes in circumstances (relevant to its GHG emissions) that occur between the reporting dates of the entities in its value chain and the date of the undertaking's general purpose financial statements

*See Disclosure of significant changes in definition of what constitutes reporting undertaking and its value chain and explanation of their effect on year-to-year comparability of reported GHG emissions*

## 7.4.3.2.19 Total GHG emission calculation methodology

### Disclosure of methodologies, significant assumptions and emissions factors used to calculate or measure GHG emissions

The calculation was performed in accordance with the GHG Protocol and includes all applicable categories. The calculation was performed by collecting inventory data and using the Umberto life cycle assessment software, which uses emission factors from the ecoinvent database. The calculation boundaries cover all company activities and consider all Canyon locations and all applicable Scope 3 categories.

#### Category 1

Canyon defined reference bicycles to determine the impact of the portfolio. Representative bicycles from the road, MTB and urban categories were selected and a distinction was made between frames made of aluminium or carbon, and e-bikes or push-bikes. For the reference bikes, all relevant components such as frames, drives, forks, wheels, saddles, pedals, cockpits, handlebars, batteries and motors for e-bikes and other small attachments were used to achieve the real bike weight. The materials or material compositions used for the respective components were determined and assigned to the component weights. The material information was then assigned to emission factors from the ecoinvent database. In order to cover the entire portfolio, the component composition of the reference bikes was scaled to the other models based on the total bike weight.

#### Category 2

Activity data was taken from Canyon's procurement systems in EUR, differentiated according to cost types such as computer systems, software, office furniture, technical systems and machines, and others. Emission factors are based on Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities from US EPA.

#### Category 3

The activity data is based on the amount and types of energy carriers, which are considered in Scopes 1&2. Emission factors used are from ecoinvent.

#### Category 4

Canyon differentiates upstream transportation and distribution emissions into inbound and outbound logistics. The same methodology is applied to both. Data on the transportation of our purchased goods, including transport mode, weight and distance data, was compiled for each region from our internal systems. Ecoinvent-specific transportation emission factors are combined with the respective transportation mode and the transported mass and distance. The same method is applied for transportation and distribution of sold products from the point of sale to the customer. Transportation of final products including transport mode, weight and distance data was compiled for each region from our internal systems. Ecoinvent-specific transportation emission factors are combined with the respective transportation mode, and the transported mass and distance.

#### Category 5

Emissions from waste currently generated in operations is calculated using the average-data method based on waste type, volume and disposal methods, with data collected from our production sites. Emission factors: average emission factors of different disposal methods from ecoinvent are applied.

### Category 6

Canyon's greenhouse gas emissions from business travel result primarily from three different travel categories: air, rental car or train. The distances covered for flights are determined by publicly-available flight distance calculators, and the start and destination locations. For rental cars, an average distance of 160 km per day is assumed. To calculate the greenhouse gas emissions, transport-specific emission factors (plane, car, rail) from ecoinvent were used.

### Category 7

Regional employee numbers were provided by Canyon's People department. Emissions were estimated based on regional average commuting modes, applying emission factors from ecoinvent specific to each commuting mode.

### Category 8

Canyon does not lease its assets for third-party operational control.

### Category 9

Due to Canyon's 'direct-to-consumer' business, this category does not apply. Outbound logistics is completely covered within category 4 upstream transportation.

### Category 10

Canyon only sells finished products, so no further processing steps are necessary.

### Category 11

Based on the sales countries, an electricity consumption of 200 kWh per life-time use was assumed for the e-bikes and the country-specific electricity emission factor from the ecoinvent database was taken into account.

### Category 12

Within the end-of-life of sold products, a distinction is made between packaging, accessories and bicycles. Activity data for calculating the end-of-life emissions of the packaging are weights of different packaging materials, which are also used for the calculation within "Purchased goods and services". Generic material-specific end-of-life emission factors from the ecoinvent database with average disposal scenarios (landfill, incineration, recycling) are used to calculate the emissions. Emissions from accessories are calculated using activity data on the total weight of products sold and generic end-of-life emission factors from the ecoinvent database of average disposal scenarios (landfill, incineration, recycling). Emissions from bicycles are calculated using activity data on the number of bicycles produced and bicycle-specific end-of-life emission factors from the ecoinvent database. Since the emission factor is based on average bike weight, the emission factor is scaled using the specific model weights to better account for both lighter and heavier bikes and their material composition.

### Category 13

Canyon does not lease any downstream assets.

### Category 14

Canyon has no franchised businesses or assets.

### Category 15

Canyon has no investment in other businesses.

## Gross Scopes 1, 2, 3 and Total GHG emissions - total GHG emissions - value chain

98,460.00 t $CO_2e$

### 7.4.3.2.20 Biogenic emissions

#### Biogenic emissions of $CO_2$ from the combustion or bio-degradation of biomass not included in Scope 1 GHG emissions

49.79 t $CO_2e$

#### Biogenic emissions of $CO_2$ from combustion or bio-degradation of biomass not included in Scope 2 GHG emissions

N/A

#### Biogenic emissions of $CO_2$ from combustion or bio-degradation of biomass that occur in value chain not included in Scope 3 GHG emissions

N/A

### 7.4.3.2.21 GHG removals projects

#### Disclosure of calculation assumptions, methodologies and frameworks applied (GHG removals and storage)

N/A

## 7.4.3.3 Environmental Information: Resource use and circular economy

### 7.4.3.3.1 Processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

#### Disclosure of methodologies, assumptions and tools used in the screening in order to identify actual and potential impacts, risks and opportunities in own operations and upstream and downstream value chain

In its double materiality assessment, Canyon identified material information on sustainability IROs and related material matters as well as material information to be reported. Judgement was used when applying the objective criteria, and the related explanations are expected to provide transparency from the undertaking to the users of the sustainability statement. Canyon's Double Materiality Assessment is based on the respective methodology outlined in Description of material impacts resulting from materiality assessment. The gross perspective was applied (industry/legal standards as baseline without mitigation measures in place are the basis for the evaluation). For further information, please refer to General Information.

#### Information about process for conducting consultations (resource and circular economy)

Canyon has not conducted specific consultations with affected communities related to resource use and circular economy.

### 7.4.3.3.2 Policies adopted to manage resource use and circular economy

#### Description of key contents of policy

Through all actions, Canyon supports the circularity approach that is connected to life cycle thinking and the EU Green Deal. This includes optimizing resource efficiency, minimizing waste, and promoting recycling. In relation to resource use and circular economy, Canyon has the following policies available.

##### Forest Conservation Policy

To reduce the use of primary materials in packaging, Canyon gives preference to paper and paper-based packaging products with high-recycled content, and strives to source in line with the FSC standard where virgin fiber cannot be replaced. Changing the sourcing approach for forest-derived products and reducing the reliance on primary resources, especially for packaging, is one of the key objectives of this policy. The Forest Conversation Policy is available to the public on canyon.com.

### Waste prevention and ecodesign plan

The waste prevention and ecodesign plan from Canyon was developed in line with the requirements of the French Plan de Conception Écologique, which is part of the French Circular Economy Act (AGEC, in force since 10th of February 2020). The overall deadline for the completion of all actions according to the AGEC is 2028. The regulation aims to transform the linear economy into a circular economy. It is divided into five main areas: re-moving disposable plastic; better informing consumers; combating waste and promoting solidarity-based re-use; acting against planned obsolescence; producing better. The implementation of the French legislature and the first report was due in 2023, and is applicable for Canyon. However, Canyon applies its waste prevention and ecodesign plan at a global level.

The plan addresses the following identified material topics and key objectives, which are further detailed in the targets section.

- The reduction of primary resources for bicycle production by setting targets related to the use of recycled aluminium.
- Use of fewer primary materials for packaging, thanks to the use of recycled materials.
- Reduction of pollutants due to waste incineration and reduction of non-recyclable waste is ad-dressed by increasing the recyclability of bicycles through targeted actions.

The plan sets targets through to 2028, with regular progress tracking and reviews every two years to assess the status and ensure alignment with the goals. The most senior level accountable is specified in the Canyon ESG Governance Policy.

### Climate Transition Plan

The material risk of higher production costs due to higher material costs is addressed in the Climate Transition Plan, outlined in Environmental information: climate change. For further information please refer to Environmental information: climate change.

## Description of scope of policy or of its exclusions

### Forest Conservation Policy

The global policy focuses on reducing the use of primary materials in packaging by prioritizing paper and paper-based products with high-recycled content. Where virgin fiber is required, sourcing aligns with FSC standards to ensure sustainable forestry practices. This policy is specific to forest-derived materials and does not address non-forest-related resources.

### Waste prevention and ecodesign plan

The plan applies globally, addressing material topics such as reducing the use of primary resources (e.g., aluminium and packaging materials), minimizing pollutants from waste incineration, and enhancing recyclability. The plan is based on AGEC requirements and sets targets through 2028, with exclusions primarily relating to non-waste-related aspects of product lifecycle management.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Description of key contents of policy.

## Description of most senior level in organisation that is accountable for implementation of policy

The Canyon ESG Governance Policy applies and specifies the most senior level accountable for this policy, including monitoring of progress (For further information, please refer to Governance information: Business Conduct).

## Disclosure of third-party standards or initiatives that are respected through implementation of policy

### Forest Conservation Policy

The policy respects the FSC (Forest Stewardship Council) standard for sourcing paper and paper-based packaging when virgin fiber is required, supporting sustainable forest management practices.

### Waste prevention and ecodesign plan

The plan aligns with the French Plan de Conception Écologique under the Circular Economy Act (AGEC), focusing on transforming the linear economy into a circular one.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Description of key contents of policy.

## Description of consideration given to interests of key stakeholders in setting policy

### Forest Conservation Policy

Stakeholders, such as customers and environmental advocacy groups, benefit from the preference for recycled content and FSC-certified materials, reducing environmental impacts.

### Waste prevention and ecodesign plan

Key stakeholders, including regulators and consumers, are addressed through compliance with the AGEC legislation and global application of the plan to enhance transparency and promote sustainable practices.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Description of key contents of policy.

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

### Forest Conservation Policy

The policy is publicly accessible on Canyon's website, ensuring visibility to affected stakeholders and those responsible for its implementation.

### Waste prevention and ecodesign plan

While the plan applies globally, its implementation includes regular reviews, progress tracking, and compliance with AGEC, providing clear guidance for internal and external stakeholders.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Description of key contents of policy.

# 7.4.3.3.3 Policies related to resource use and circular economy

## Disclosure of whether and how policy addresses transitioning away from extraction of virgin resources, including relative increases in use of secondary (recycled) resources

### Forest Conservation Policy

The policy explicitly focuses on reducing the use of primary materials by prioritizing recycled content and FSC-certified sources when virgin fiber is required.

### Waste prevention and ecodesign plan

The plan targets reductions in primary resources for bicycle production and packaging, emphasizing the increased use of recycled aluminium and materials with higher recyclability.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Description of key contents of policy.

## Disclosure of whether and how policy addresses sustainable sourcing and use of renewable resources

### Forest Conservation Policy

Sustainable sourcing is directly addressed by prioritizing recycled content and ensuring virgin fiber sourcing aligns with FSC standards.

### Waste prevention and ecodesign plan

The plan supports sustainable sourcing by targeting increased use of recycled materials and promoting design improvements for enhanced recyclability.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Description of key contents of policy.

## 7.4.3.3.4 Actions and resources in relation to resource use and circular economy

### Disclosure of key action

The following actions are aimed at addressing key impacts and risks related to bicycle production and its environmental footprint. These actions focus on minimizing the consumption of primary resources in manufacturing, reducing primary material use in packaging by incorporating recycled materials, and replacing non-degradable plastic packaging with paper-based alternatives to promote a circular economy. Additionally, they address emissions from waste incineration and work to counteract the increase in non-recyclable waste, such as carbon fiber. Together, these actions drive progress toward reducing environmental impacts and enhancing sustainability across the production process.

#### Matrix

Canyon developed a material decision matrix to guide plastics sourcing decisions with the aim of in-creasing recyclability and thus reducing non-recyclable waste, aiming to support a circular economy approach and to reduce dependence on primary resources. The matrix is an internal and informal tool providing orientation in Canyon's ongoing efforts to develop and set up a systematic approach regarding its use of resources and certified recycled content. The matrix continues to serve as a decision tree without time limit.

#### Circularity workshop

Comprehensive awareness-raising trainings on circular economy were conducted by an external ser-vice provider in 2024. Departments involved in the training include ESG, R&D, and Legal. The goal of the training is to create a level playing field of know-how in the company, in order to facilitate the operationalization of circular economy goals. The training fosters a shared understanding of material and component circularity, emphasizing their integration into daily business operations. This ensures consistent knowledge across all participants, enabling uniform implementation of circularity principles and potential applications throughout the organization. The training will continue in 2025.

#### Internal working groups

Canyon established four internal working groups in 2024 and assigned them to evaluate measures and potential actions towards more sustainable resource use related to aluminium, plastic and composites, packaging and batteries. Based on the result of the working groups, Canyon will define further targets and actions covering adjustments to Canyon's production processes and product design, aiming to reduce negative impacts and advance positive ones. This action will support the improvement of Canyon's waste prevention and ecodesign plan, and thus supports the mitigation of all material topics. The work of the working groups is indefinite and not bound to any specific time frame.

#### Waste prevention and ecodesign plan actions

Within the waste prevention and ecodesign plan, Canyon has set basic targets and outlined measures for their achievement, but will move on to successively refine targets and include time-horizons based on the working groups' analysis, with the objective of creating a complete and comprehensive roadmap. Key actions are expected to have an effect on the upstream value chain. Based on Canyon's waste prevention and ecodesign plan, and in order to increase the use of recycled materials by incorporating them in a closed loop cycle, Canyon continued its support for Schwalbe's recycling initiative in 2024, which focuses on the collection and recycling of used tubes and tyres. Used tubes and tyres are collected and returned to Schwalbe for recycling. This process was implemented as a long-term process in 2023. Canyon also tested the incorporation of recycled materials by starting a project using new production methods for the company, and new materials. Due to potential competitive disadvantages, further insights will be shared in next year's report. Research related to the use of recycled aluminium started as well. Further information can be found in the target section. Canyon also initiated a plastic injection pilot project to increase the use of recycled plastic in Canyon-engineered parts. Currently, parts with 100% recycled PA, and selected battery and motor covers containing recycled PA ABS are under development.

#### Reducing intra-logistics packaging waste

In 2024, Canyon reviewed and optimized its internal logistics processes with a focus on reducing pack-aging volumes. As part of this initiative, Canyon introduced reusable transport containers in selected areas and replaced plastic wrap with tension straps to secure pallets where possible. These changes were implemented to minimize packaging waste within the company's internal operations. This is a continuous process and supports the reduction of emissions due to waste incineration.

#### International EPR schemes

Extended Producer Responsibility (EPR) schemes are environmental policies that hold producers ac-countable for the entire lifecycle of their products, from design to end-of-life management. This includes responsibilities such as waste collection and recycling. The goal of EPR is to encourage producers to design products with minimal environmental impact and to ensure that they are properly dis-posed of or recycled at the end of their useful life. In the context of Canyon's operations, the ESG and Legal Departments actively and continuously monitor and comply with global legislation, including EPR schemes in various countries. These schemes are particularly relevant to Canyon's own operations and its material impacts, as they involve the collection and recycling of used packaging materials in the after use phase and the downstream value chain. Adhering to these EPR schemes is part of a broader effort to reduce the environmental footprint of Canyon products and packaging, which is also in line with legal requirements.

#### Waste management

Canyon follows the waste hierarchy of the Circular Economy Act (Kreislaufwirtschaftsgesetz). The first priority is waste prevention, followed by the reuse of products. Next comes recycling, as well as other forms of recovery, such as energy recovery. Disposal, like landfill, is considered the last resort. Operationally, Canyon has implemented waste separation as a standard continuous process to reduce the environmental impact of the waste treatment methods used by the companies managing the waste streams. Specific waste streams are handled separately by external companies. These include items such as batteries, tyres, tubes, and carbon waste generated at the Koblenz site. Batteries are recycled through the GRS program, while tyres and tubes are returned through the Schwalbe recycling initiative. Carbon waste is treated by an external company using pyrolysis, enabling the recovery of carbon fibers for use in other applications. This action relates to the material impact of emissions due to waste incineration. None of the waste management measures mentioned are subject to a time frame.

### Description of scope of key action

*See Disclosure of key action*

### Time horizon under which key action is to be completed

*See Disclosure of key action*

### Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

*See Disclosure of key action*

### Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

N/A

### Disclosure of the type of current and future financial and other resources allocated to the action plan

Operational expenditures (OPEX) and capital expenditures (CAPEX) are set to remain below the established financial threshold.

## 7.4.3.3.5 Target 1: Reduce consumption of primary material for bicycle production

### Relationship with policy objectives

In relation to resource use and circular economy, Canyon has the following policies available. The policies are designed to address key impacts and risks related to bicycle production and its environmental impact. These include the consumption of primary resources in manufacturing, the reduction of primary material use in packaging through increased reliance on recycled materials, and the transition from non-degradable plastic to paper-based packaging to support a circular economy. Furthermore, the policies tackle emissions generated by waste incineration and seek to mitigate the rise in non-recyclable waste, such as carbon fiber. Together, these measures aim to minimize environmental impact and enhance sustainability across the production lifecycle.

#### Forest Conservation Policy

To reduce the use of primary materials in packaging, Canyon gives preference to paper and paper-based packaging products with high-recycled content, and strives to source in line with the FSC standard where virgin fiber cannot be replaced. Changing the sourcing approach for forest-derived products and reducing the reliance on primary resources, especially for packaging, is one of the key objectives of this policy. The Forest Conversation Policy is available to the public on canyon.com. The Canyon ESG Governance Policy applies and specifies the most senior level accountable for this policy, including monitoring of progress (For further information, please refer to Governance information: Business Conduct).

#### Waste prevention and ecodesign plan

The waste prevention and ecodesign plan from Canyon was developed in line with the requirements of the French Plan de Conception Écologique, which is part of the French Circular Economy Act (AGEC, in force since 10th of February 2020). The overall deadline for the completion of all actions according to the AGEC is 2028. The regulation aims to transform the linear economy into a circular economy. It is divided into five main areas: re-moving disposable plastic; better informing consumers; combating waste and promoting solidarity-based re-use; acting against planned obsolescence; producing better. The implementation of the French legislature and the first report was due in 2023, and is applicable for Canyon. However, Canyon applies its waste prevention and ecodesign plan at a global level. The plan addresses the following identified material topics and key objectives, which are further detailed in the targets section.

- The reduction of primary resources for bicycle production by setting targets related to the use of recycled aluminium.
- Use of fewer primary materials for packaging, thanks to the use of recycled materials.
- Reduction of pollutants due to waste incineration and reduction of non-recyclable waste is ad-dressed by increasing the recyclability of bicycles through targeted actions.

The plan sets targets through to 2028, with regular progress tracking and reviews every two years to assess the status and ensure alignment with the goals. The most senior level accountable is specified in the Canyon ESG Governance Policy.

### Climate Transition Plan

The material risk of higher production costs due to higher material costs is addressed in the Climate Transition Plan, outlined in Environmental information: Climate Change. For further information please refer to Policies related to climate change mitigation and adaptation and Description of key contents of policy.

## Measurable target

Canyon aims to increase the use of recycled aluminium in Canyon frames to 25%, covering the 2028 bike portfolio from a 2024 baseline with 0% of recycled aluminium. Measurement of target achievement will be related to the % of recycled aluminium sourced for frames as % of total aluminium sourced.

## Nature of target

Both targets are relative targets and are measured as a percentage change from the target year to the base year. For further information, please refer to Environmental information: Resource Use and Circular Economy, Measurable target.

## Description of scope of target

Target 1 includes the aluminium recycled content in Canyon frames covering the 2028 bike portfolio.

## Baseline value

0

## Baseline year

2024

## Period to which target applies

Target 1 covers the period from 2024 to 2028 (For further information, please refer to Chapter Environmental information: Resource Use and Circular Economy, Measurable target.)

## Indication of milestones or interim targets

To achieve this target, Canyon will engage with partners in the value chain, assess the impact on product quality when using recycled instead of primary material to guarantee performance needs and consequently source recycled material and integrate it into its products.

## Description of methodologies and significant assumptions used to define target

Targets were defined by applying current knowledge about feasibility.

## Target related to environmental matters is based on conclusive scientific evidence

In opposition to the greenhouse gas emission reduction target described in ESRS E1, the ambition of the targets in ESRS E5 are not based on scientific evidence due to a lack of relevant frameworks. However, Scientific evidence suggests that recycled aluminium has a reduced environmental impact due to less energy consumption with up to 95% savings (https://international-aluminium.org/new-iai-study-reveals-environmental-benefits-of-increased-global-aluminium-can-recycling/). According to the findings of the Environmental Paper Network, evidence suggests that recycled paper has a lower environmental impact than primary paper (https://environmentalpaper.org/). Concerning plastic, impacts vary depending on the material. In general, however, the environmental impact of recycled plastic materials is lower. For example, carbon emissions during pellet production from plastic waste are 22.6% lower, and other environmental impacts are reduced by between 11% and 40% compared to primary polypropylene https://www.sciencedirect.com/science/article/pii/S2352186423002857. No target for positive impacts has been developed.

## Disclosure of whether and how stakeholders have been involved in target setting

Internal stakeholders participated in the target setting process, specifically representatives from the R&D and Packaging Departments at Canyon.

### 7.4.3.3.6 Target 2: Use less primary material for packaging due to the use of recycled materials

## Relationship with policy objectives

In relation to resource use and circular economy, Canyon has the following policies available. The policies are designed to address key impacts and risks related to bicycle production and its environmental impact. These include the consumption of primary resources in manufacturing, the reduction of primary material use in packaging through increased reliance on recycled materials, and the transition from non-degradable plastic to paper-based packaging to support a circular economy. Furthermore, the policies tackle emissions and pollutants generated by waste incineration and seek to mitigate the rise in non-recyclable waste, such as carbon fiber. Together, these measures aim to minimize environmental impact and enhance sustainability across the production lifecycle.

#### Forest Conservation Policy

To reduce the use of primary materials in packaging, Canyon gives preference to paper and paper-based packaging products with high-recycled content, and strives to source in line with the FSC standard where virgin fiber cannot be replaced. Changing the sourcing approach for forest-derived products and reducing the reliance on primary resources, especially for packaging, is one of the key objectives of this policy. The Forest Conversation Policy is available to the public on canyon.com. The Canyon ESG Governance Policy applies and specifies the most senior level accountable for this policy, including monitoring of progress (For further information, please refer to Governance information: Business Conduct).

#### Waste prevention and ecodesign plan

The waste prevention and ecodesign plan from Canyon was developed in line with the requirements of the French Plan de Conception Écologique, which is part of the French Circular Economy Act (AGEC, in force since 10th of February 2020). The overall deadline for the completion of all actions according to the AGEC is 2028. The regulation aims to transform the linear economy into a circular economy. It is divided into five main areas: re-moving disposable plastic; better informing consumers; combating waste and promoting solidarity-based re-use; acting against planned obsolescence; producing better. The implementation of the French legislature and the first report was due in 2023, and is applicable for Canyon. However, Canyon applies its waste prevention and ecodesign plan at a global level. The plan addresses the following identified material topics and key objectives, which are further detailed in the targets section.

- The reduction of primary resources for bicycle production by setting targets related to the use of recycled aluminium.
- Use of fewer primary materials for packaging, thanks to the use of recycled materials.
- Reduction of pollutants due to waste incineration and reduction of non-recyclable waste is ad-dressed by increasing the recyclability of bicycles through targeted actions.

The plan sets targets through to 2028, with regular progress tracking and reviews every two years to assess the status and ensure alignment with the goals. The most senior level accountable is specified in the Canyon ESG Governance Policy.

#### Climate Transition Plan

The material risk of higher production costs due to higher material costs is addressed in the Climate Transition Plan, outlined in Environmental information: Climate Change. For further information please refer to Policies related to climate change mitigation and adaptation and Description of key contents of policy.

## Measurable target

Canyon aims to increase the use of recycled content in its Bike Guard globally, starting from the base year 2024, with 61% recycled cardboard and 27% recycled plastic. By the end of 2030, the target is to achieve minimum 80% recycled cardboard and 75% recycled plastic. With this goal and the associated measures, Canyon aims to reduce the consumption of primary materials for packaging. The focus is on the Bike Guard, as it represents 96% of all packaging materials by weight sourced by Canyon.

## Nature of target

Both targets are relative targets and are measured as a percentage change from the target year to the base year. For further information, please refer to Environmental information: Resource Use and Circular Economy, Measurable target.

## Description of scope of target

Target 2 includes the use of recycled content in the Bike Guard globally. (For further information, please refer to Environmental information: Resource Use and Circular Economy, Measurable target.)

## Baseline value

61

## Baseline year

2024

## Explanation baseline value

Target 2 has a baseline value of 61% recycled cardboard and 27% recycled plastic.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Measurable target.

## Period to which target applies

Target 2 covers the period from 2024 to 2030. (For further information, please refer to Environmental information: Resource Use and Circular Economy, Measurable target.)

## Indication of milestones or interim targets

To achieve this target, Canyon will engage with partners in the value chain, assess the impact on product quality when using recycled instead of primary material to guarantee performance needs and consequently source recycled material and integrate it into its products.

## Description of methodologies and significant assumptions used to define target

Targets were defined by applying current knowledge about feasibility.

## Target related to environmental matters is based on conclusive scientific evidence

In opposition to the greenhouse gas emission reduction target described in ESRS E1, the ambition of the targets in ESRS E5 are not based on scientific evidence due to a lack of relevant frameworks. However, Scientific evidence suggests that recycled aluminium has a reduced environmental impact due to less energy consumption with up to 95% savings (https://international-aluminium.org/new-iai-study-reveals-environmental-benefits-of-increased-global-aluminium-can-recycling/). According to the findings of the Environmental Paper Network, evidence suggests that recycled paper has a lower environmental impact than primary paper (https://environmentalpaper.org/). Concerning plastic, impacts vary depending on the material. In general, however, the environmental impact of recycled plastic materials is lower. For example, carbon emissions during pellet production from plastic waste are 22.6% lower, and other environmental impacts are reduced by between 11% and 40% compared to primary polypropylene https://www.sciencedirect.com/science/article/pii/S2352186423002857.

## Disclosure of whether and how stakeholders have been involved in target setting

Internal stakeholders participated in the target setting process, specifically representatives from the R&D and Packaging Departments at Canyon.

## Disclosure of how target relates to resources (resource use and circular economy)

### Target 1 Reduce consumption of primary material for bicycle production

The target directly addresses resource use by reducing reliance on primary aluminium in bicycle production. This shift supports a circular economy by integrating recycled materials into the production process

### Target 2 Use less primary material for packaging due to the use of recycled materials

The target focuses on reducing the use of primary materials in packaging by increasing recycled content in Bike Guards. This aligns with circular economy principles by prioritizing recycled inputs over virgin resources.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Relationship with policy objectives.

## Disclosure of how target relates to increase of circular design

### Target 1 Reduce consumption of primary material for bicycle production

Circular design principles are supported through the integration of recycled aluminium, promoting resource efficiency and reducing waste in the production process.

### Target 2 Use less primary material for packaging due to the use of recycled materials

The target fosters circular design by incorporating recycled cardboard and plastic into packaging, ensuring materials remain within the production cycle rather than being disposed of.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Relationship with policy objectives.

## Disclosure of how target relates to increase of circular material use rate

### Target 1 Reduce consumption of primary material for bicycle production

By aiming for 25% recycled aluminium in frames by 2028, the target increases the rate of circular material use in the production of bicycles.

### Target 2 Use less primary material for packaging due to the use of recycled materials

The target seeks to increase recycled material content in Bike Guards to 80% for cardboard and 75% for plastic by 2030, thereby boosting the circular material use rate for packaging.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Relationship with policy objectives.

## Disclosure of how target relates to minimisation of primary raw material

### Target 1 Reduce consumption of primary material for bicycle production

The target explicitly reduces reliance on primary aluminium by replacing it with recycled content, minimizing the extraction of virgin resources.

### Target 2 Use less primary material for packaging due to the use of recycled materials

The target reduces primary raw material usage for packaging by prioritizing recycled cardboard and plastic, directly addressing resource consumption.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Relationship with policy objectives.

## Disclosure of how target relates to reversal of depletion of stock of renewable resources

### Target 1 Reduce consumption of primary material for bicycle production

While the target focuses on aluminium, a non-renewable resource, it indirectly supports the preservation of renewable resources by reducing overall environmental impacts through lower energy use and emissions.

### Target 2 Use less primary material for packaging due to the use of recycled materials

By increasing recycled content in packaging materials, the target contributes to reducing pressure on renewable resources like forests, as less virgin paper is required.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Relationship with policy objectives.

## Target relates to waste management

### Target 1 Reduce consumption of primary material for bicycle production

The target supports waste management by promoting the use of recycled aluminium, aligning with recycling principles to divert waste from landfills.

### Target 2 Use less primary material for packaging due to the use of recycled materials

The target aligns with waste management practices by incorporating recycled cardboard and plastic, reducing packaging waste and supporting recycling efforts.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Relationship with policy objectives.

## Disclosure of how target relates to waste management

### Target 1 Reduce consumption of primary material for bicycle production

The target contributes to waste management by reducing the need for primary aluminium extraction and processing, promoting the use of post-consumer materials.

### Target 2 Use less primary material for packaging due to the use of recycled materials

The target enhances waste management by increasing the use of recycled materials in packaging, ensuring that materials are reused rather than discarded.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Relationship with policy objectives.

## Disclosure of how target relates to other matters related to resource use or circular economy

### Target 1 Reduce consumption of primary material for bicycle production

The target supports Canyon's climate goals by reducing the carbon footprint associated with aluminium production, as recycled aluminium requires less energy.

### Target 2 Use less primary material for packaging due to the use of recycled materials

The target aligns with EU Packaging and Packaging Waste Regulation requirements, exceeding regulatory goals and demonstrating leadership in sustainable packaging practices.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Relationship with policy objectives.

## Layer in waste hierarchy to which target relates

### Target 1 Reduce consumption of primary material for bicycle production

The target relates to the "Recycle" layer of the waste hierarchy, as it focuses on the use of recycled aluminium to reduce resource extraction.

### Target 2 Use less primary material for packaging due to the use of recycled materials

The target aligns with the "Recycle" layer of the waste hierarchy by increasing recycled content in packaging materials, reducing dependency on primary inputs.

For further information, please refer to Environmental information: Resource Use and Circular Economy, Relationship with policy objectives.

## The targets being set and presented are mandatory (required by legislation)

The target ambition is voluntary, and the target was included in the waste prevention and ecodesign plan delivered in line with the requirements of the French regulation (For further information, please refer to Environmental information: Resource Use and Circular Economy, Relationship with policy objectives).

## 7.4.3.3.7 Resource inflows

### Disclosure of information on material resource inflows

#### Overview of materials and critical materials used

Critical raw materials are essential for modern bicycles, especially high-performance and electric models. Aluminium, derived from bauxite, is widely used in frames for its lightweight and durable properties. Cobalt and lithium are key in e-bike batteries, providing necessary energy storage and longevity. Copper supports wiring and braking systems due to its excellent conductivity, while magnesium serves as a lightweight alternative for example in suspension forks, enhancing agility. Titanium alloys, strengthened with vanadium, offer strong, corrosion-resistant material. Rare earth elements are critical for powerful magnets in e-bike motors, ensuring efficient propulsion.

The main materials used in bicycle production can be broken down as follows (in % of annual purchasing volume): 40% aluminium, 15% composites, 11% steel and 12% rubber.

After careful consideration, we identified aluminium as a key material due to its impact and mass volume. Nevertheless, the environmental impact was assessed holistically, taking all materials into account.

For packaging, the main raw materials used are plastic and forest-derived products.

### Percentage of biological materials (and biofuels used for non-energy purposes)

42.00 %

### The absolute weight of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture the undertaking's products and services (including packaging)

1,189.00 t

### Percentage of secondary reused or recycled components, secondary intermediary products and secondary materials

24.00 %

### Description of methodologies used to calculate data and key assumptions used

The calculation of the weight of products and materials takes place in the course of determining Canyon's Carbon Footprint. Canyon defines reference bicycles to determine the impact of the portfolio. Representative bicycles from the road, MTB and urban categories were selected and a distinction was made between frames made of aluminium or carbon, and e-bikes or push-bikes. For the reference bikes, all relevant components such as frames, drives, forks, wheels, saddles, pedals, cockpits, handlebars, batteries and motors for e-bikes and other small attachments were used to achieve the real bike weight. The materials or material compositions used for the respective components were determined and assigned to the component weights. In order to cover the entire portfolio, the component composition of the reference bikes was scaled to the other models based on the total bike weight. Information about GEAR products is collected based on product weight and essential composition.

For packaging material management, the quantity of material purchased is tracked and cross-referenced with a packaging master file. This file includes essential details such as weight, recycled content, and relevant certifications. By combining this data with production records from each site, it's possible to calculate the amount of packaging material used per bicycle. In cases where data on packaging material is missing, estimates are based on the location's production data and the average packaging use per bicycle in the Koblenz facility. In these instances, a worst-case assumption is applied, treating the material as 100% primary.

All metals are considered 100% recyclable. Other materials may also be partially recyclable; however, this largely depends on local conditions and infrastructure. Consequently, in the worst-case scenario, only metals are assumed to be recyclable.

### Description of how double counting was avoided and of choices made

By considering both topics separately, double counting between reuse and recycling is avoided, especially since both topics represent different life cycle stages. Reuse takes place before the actual end of life, whereas recycling takes place afterward.

## 7.4.3.3.8 Resource outflows

### Description of the key products and materials that come out of the undertaking's production process

Canyon Bicycles specializes in the production of high-performance bicycles, including road, mountain, gravel, urban, and e-bikes, designed for a wide range of cycling disciplines and user needs. The key materials used in the production process include aluminum, carbon fiber, steel, plastic composites, and rubber, which together account for the majority of the bicycles' components by weight.

### Overall total weight of products and technical and biological materials used during the reporting period

2,875.00 t

## 7.4.3.3.9 Product recyclability and reusability

### Disclosure of the reparability of products

Canyon emphasizes repairability by providing access to replacement parts and repair services. The direct-to-consumer model allows Canyon to offer specific spare parts directly to customers. The design philosophy increasingly incorporates modular components (e.g. removable derailleur hangers, replaceable bearings) and tool-free access points, making it easier for customers or local bike shops to perform repairs. For advanced repairs, Canyon's service network can provide specialized support, reinforcing the brand's commitment to extending the product lifecycle.

### The rates of recyclable content in products

47.00 %

### The rates of recyclable content in products packaging

99.00 %

### Explanation expected durability of products placed on the market

Currently, there is no universally applicable industry standard for defining durability in the bicycle sector, which is why Canyon focused on the main components—frame and battery—as key indicators of durability.

#### Durability of Batteries

The durability of the batteries used in Canyon's bicycles is determined based on information provided by the manufacturers. The key indicator for the durability of the batteries is the performance over charging cycles. The batteries are built to endure up to 500 full charging cycles in average while retaining a relevant portion of their original capacity. These specifications provide measurable insights into the longevity of Canyon's products, ensuring compliance with reporting requirements.

#### Durability of Frames

The durability of our bicycle frames is tested according to legal standards and internal testing conditions, based on ISO 4210:2023. This standard defines the testing requirements for various bike types, including road bikes, mountain bikes, e-bikes, and others. While all bikes, from entry-level models to high-performance bicycles, meet these basic requirements, Canyon products are designed to handle more demanding conditions.

In addition to the legal requirements, Canyon applies individual Canyon Testing Conditions, which divide the portfolio into the following categories:

- Condition 1: Road Bike, Cyclocross
- Condition ICX: Gravel Bike
- Condition 2: Trekking & City Bikes
- Condition 3: Sport, Trail, Race, Marathon and Allmountain MTB
- Condition 4: Enduro MTB
- Condition 5: Freeride, Slopestyle, Downhill and Dirt MTB

The Fatigue Testing applies an additional load (+15-20%) to all frames, regardless of bike category, to ensure they exceed standard fatigue testing requirements. This approach guarantees the performance and longevity of Canyon bicycles under real-world conditions.

## 7.4.3.3.10 Waste generated, by composition

### Disclosure of composition of waste

For Canyon, waste streams generated from its own operations are categorized into non-hazardous and hazardous waste. Non-hazardous waste includes materials such as aluminium, carbon fiber, plastics, and packaging materials like cardboard, primarily resulting from manufacturing and shipping activities.

### Disclosure of waste streams relevant to undertaking's sector or activities

For further information, please refer to Environmental information: Resource Use and Circular Economy, Disclosure of composition of waste

### Disclosure of materials that are present in waste

For further information, please refer to Environmental information: Resource Use and Circular Economy, Disclosure of composition of waste

### Description of methodologies used to calculate data (waste generated)

For the locations in Germany, figures are provided by the external service provider. For small market locations (where shared offices are sometimes rented), only the quantity in liters in relation to the ton size may be known. This quantity is converted into kg using a conversion table (based on https://www.umweltberatung.at/).

### Description of methodologies used to calculate data (resource outflows)

Resource outflows are based on the resource inflows data and are assumed to be identical. Waste is excluded in this analysis and is treated separately.

## 7.4.3.3.11 Waste disposal, by disposal type

### Non-recycled waste

159.52 t

### Percentage of non-recycled waste

18.00 %

### Total waste generated

890.76 t

### Total amount of hazardous waste

0.14 t

### Waste: diverted from disposal

| Type of waste | Recovery operation type | Total (t) |
|---|---|---|
| Hazardous | Preparation for reuse | 0.00 |
| Hazardous | Recycling | 0.00 |
| Hazardous | Other | 0.00 |
| Non-hazardous | Preparation for reuse | 0.00 |
| Non-hazardous | Recycling | 0.00 |
| Non-hazardous | Other | 731.24 |
| Radioactive | Preparation for reuse | 0.00 |
| Radioactive | Recycling | 0.00 |
| Radioactive | Other | 0.00 |

### Waste: directed to disposal

| Waste type | Treatment type | Total (t) |
|---|---|---|
| Hazardous | Incineration | 0.13 |
| Hazardous | Landfill | 0.00 |
| Hazardous | Other | 0.01 |
| Non-hazardous | Incineration | 155.43 |
| Non-hazardous | Landfill | 3.95 |
| Non-hazardous | Other | 0.00 |
| Radioactive | Incineration | 0.00 |
| Radioactive | Landfill | 0.00 |
| Radioactive | Other | 0.00 |
| **Total** | | **159.52** |

## 7.4.3.4 Social Information: Own Workforce

## 7.4.3.4.1 Material impacts, risks and opportunities and their interaction with strategy and business model

### Description of types of employees and non-employees in its own workforce subject to material impacts

Canyon has addressed issues connected to the health of its workforce at a local level since 2014. Due to the international expansion of the business, Canyon adopted a global approach in 2023 to offer professional preventive mental health services to all employees worldwide. This global approach is intended to ensure that Canyon employees, regardless of their location and role, have equal and unlimited access to the health program, which includes services provided by high-quality resources and certified professionals at the Fürstenberg Institute. The program is available to the entire Canyon workforce except for temporary Canyon employees. In addition to its permanent employees, Canyon has commissioned self-employed workers worldwide, to whom the program is not available. Managers at Canyon are encouraged to promote the program and support their team in using its resources.

To ensure clarity in workforce definitions, Canyon applies the following terms:

- Employee: All individuals employed by the company, regardless of the type of contract or the number of weekly working hours. This includes full-time and part-time employees, as well as those with permanent or temporary contracts. Additionally, it includes students, trainees, and apprentices involved in the company's workforce.
- Permanent employee: Employees who hold a permanent employment contract with no predefined end date. These employees have an ongoing, indefinite employment relationship with the company. They are distinct from non-permanent employees, whose contracts have a specific end date.
- Non-permanent employee: Employees who hold a fixed-term employment contract that specifies a defined end date for their employment.
- Full-time employee: An employee whose individually agreed working hours correspond to 100% of the standard weekly working time, equivalent to one Full-Time Equivalent (FTE).
- Part-time employee: An employee whose individually agreed working hours are less than 100% of the standard weekly working time, equivalent to less than one Full-Time Equivalent (FTE).

## Material negative impacts occurrence (own workforce)

N/A – only one positive material impact identified (For further information, please refer to General information Material impacts, risks and opportunities and their interaction with strategy and business model)

## Description of activities that result in positive impacts and types of employees and non-employees in its own workforce that are positively affected or could be positively affected

As Canyon itself is part of a wider ecosystem, Canyon further acknowledges that its employees may face internal and external challenges. Canyon therefore decided to support its employees beyond work-related issues with a preventive approach, regardless of their role, and in 2023 partnered with the Fürstenberg Institute (www.fuerstenberg-institut.de) to offer comprehensive certified corporate mental health counselling and coaching to the Canyon workforce. By investing in overall employee health and well-being, Canyon aims to reduce illness-related absences and maintain a low turnover rate in the mid- and long-term through this targeted support. Improved mental health can contribute to better concentration, improve risk awareness, and enhance the ability to assess potential hazards, further supporting a safe and productive work environment.

### Individual counselling and coaching

The health program provides various health services including individual counselling sessions for all Canyon employees. Support is available covering various topics, including professional challenges, personal difficulties, and health concerns, as well as specific counselling for leadership-related issues. Participation in the program is entirely free for Canyon employees, who can access the services anonymously, with their privacy ensured at all times. Counselling and coaching options serve as preventive measures aimed at mitigating potential health issues before they arise. A designated member of the People Team, under the lead of the Vice President People, serves as the primary contact for the Fürstenberg Institute, and handles all inquiries related the program, ensuring seamless coordination and support.

### myFürstenberg Platform

The concept includes self-help resources, such as an extensive media library with videos, podcasts, meditation exercises, and various documents on demand. Consultations or attendance at educational events can be booked online. Users can create personal profiles using their email address and a custom password, allowing them to save and revisit content, such as a 5-minute meditation for a lunch break. While personal profiles facilitate a more customised experience, confidentiality and anonymity are guaranteed. Access through a general company login is also available, ensuring that all usage remains confidential, and that Canyon does not receive information about individual use.

## Description of material risks and opportunities arising from impacts and dependencies on own workforce

N/A – only one positive material impact identified (For further information, please refer to General information Material impacts, risks and opportunities and their interaction with strategy and business model)

## Description of material impacts on workers that may arise from transition plans for reducing negative impacts on environment and achieving greener and climate-neutral operations

N/A

## Information about type of operations at significant risk of incidents of forced labour or compulsory labour

None of Canyon's own operations is at significant risk of incidents of forced labour or compulsory labour, or of incidents of child labour. With regard to those risks in the value chain (For further information, please refer to Social information: Workers in the Value Chain).

## Information about countries or geographic areas with operations considered at significant risk of incidents of forced labour or compulsory labour

*See Information about type of operations at significant risk of incidents of forced labour or compulsory labour*

## Information about type of operations at significant risk of incidents of child labour

*See Information about type of operations at significant risk of incidents of forced labour or compulsory labour*

### Information about countries or geographic areas with operations considered at significant risk of incidents of child labour

*See Information about type of operations at significant risk of incidents of forced labour or compulsory labour*

### Disclosure of how understanding of people in its own workforce / value chain workers with particular characteristics, working in particular contexts, or undertaking particular activities may be at greater risk of harm has been developed

As Canyon itself is part of a wider ecosystem, Canyon further acknowledges that its employees may face internal and external challenges. Canyon therefore decided to support its employees beyond work-related issues with a preventive approach, regardless of their role, and in 2023 partnered with the Fürstenberg Institute (www.fuerstenberg-institut.de) to offer comprehensive certified corporate mental health counselling and coaching to the Canyon workforce. Canyon has addressed issues connected to the health of its workforce at a local level since 2014. Due to the international expansion of the business, Canyon adopted a global approach in 2023 to offer professional preventive mental health services to all employees worldwide. This global approach is intended to ensure that Canyon employees, regardless of their location and role, have equal and unlimited access to the health program, which includes services provided by high-quality resources and certified professionals at the Fürstenberg Institute. The program is available to the entire Canyon workforce except for temporary Canyon employees. In addition to its permanent employees, Canyon has commissioned self-employed workers worldwide, to whom the program is not available (For further information, please refer to Chapter S2 Workers in the Value Chain).

### Disclosure of which of material risks and opportunities arising from impacts and dependencies on people in its own workforce relate to specific groups of people

N/A – only one positive material impact identified (For further information, please refer to General information, Material impacts, risks and opportunities and their interaction with strategy and business model)

### All people in its own workforce who can be materially impacted by undertaking are included in scope of disclosure

Canyon has addressed issues connected to the health of its workforce at a local level since 2014. Due to the international expansion of the business, Canyon adopted a global approach in 2023 to offer professional preventive mental health services to all employees worldwide. This global approach is intended to ensure that Canyon employees, regardless of their location and role, have equal and unlimited access to the health program, which includes services provided by high-quality resources and certified professionals at the Fürstenberg Institute. The program is available to the entire Canyon workforce except for temporary Canyon employees. In addition to its permanent employees, Canyon has commissioned self-employed workers worldwide, to whom the program is not available. Managers at Canyon are encouraged to promote the program and support their team in using its resources.

## 7.4.3.4.2 Policies to manage material impacts, risks and opportunities related to its own workforce

### Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce

The Canyon Code of Ethics is closely aligned with the positive material impact of protecting employee mental health, which is addressed within Canyon's own operations through the mental health program in collaboration with Fürstenberg Institute GmbH.

#### Canyon Code of Ethics

The Canyon Code of Ethics forms the basis of our collaboration, giving guidance to the entire workforce about desired behaviours and non-tolerated behaviours at Canyon. It supports the company goal of creating an environment that empowers Canyon employees to deliver top-tier performance. Specifically, chapter 2 of the Canyon Code of Ethics outlines the commitment to the Occupational Health and Safety of the workforce: "It's of paramount importance for us to safeguard the health and safety of our employees at Canyon. We want the workplace to be a place that respects both the physical and mental health of our employees." It addresses specific risk areas like financial crime, whistleblowing, health and safety, competition law, diversity and inclusion, intellectual property, data privacy, environmental responsibility, and human rights. Any non-compliance with this Code can be reported anonymously through the Speak Up platform (For further information, please refer to Chapter G1 Business Conduct). The Canyon Code of Ethics is available via the Intranet and on canyon.com. The responsibility for the strategic direction, approval, and review of the ESG codes and policies has been assigned to the Advisory Board. The Chief Executive Officer (CEO) remains responsible for the overall compliance, monitoring of progress, and implementation of the policies (For further information, please refer to Chapter G1 Business Conduct).

### Description of key contents of policy

*See Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce*

### Description of scope of policy or of its exclusions

*See Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce*

### Description of most senior level in organisation that is accountable for implementation of policy

*See Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce*

### Disclosure of third-party standards or initiatives that are respected through implementation of policy

*See Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce*

### Description of consideration given to interests of key stakeholders in setting policy

*See Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce*

### Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

*See Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce*

### Description of relevant human rights policy commitments relevant to own workforce

*See Disclosure of whether and how policies are aligned with relevant internationally recognised instruments*

### Disclosure of general approach in relation to respect for human rights including labour rights, of people in its own workforce

Canyon has implemented a human rights due diligence process aligned with international human rights frameworks and standards. This process encompasses the entire value chain, including Canyon's own workforce (For further information, please refer to Social information: Workers in the Value Chain).

### Disclosure of general approach in relation to engagement with people in its own workforce

Engagement with people in Canyon's own workforce is conducted through management roadshows and bi-weekly Works Council and management meetings, represented by the VP People, Senior Director People EMEA/APAC, and Global Director Operations, ensuring open dialogue and alignment with workforce needs and expectations.

### Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts

For further information, please refer to General information

## Disclosure of whether and how policies are aligned with relevant internationally recognised instruments

### Connection to international frameworks

The Canyon Code of Ethics in chapter 8 references the Canyon Environmental, Social and Governance policy (For further information, please refer to Chapter G1 Business Conduct), which includes the principles of fundamental international key frameworks, such as:

- The Universal Declaration of Human Rights and the two main international instruments through which it has been codified: The International Covenant on Civil and Political Rights (ICCPR) and its two Protocols, and the International Covenant on Economic Social and Cultural Rights (ICESCR)
- The UN Guiding Principles on Business and Human Rights
- Organisation of Economic Cooperation and Development ("OECD") Guidelines for Multinational Enterprises
- The Dhaka Principles for Migration with Dignity
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its core Conventions and Recommendations.

Chapter 1 of the Canyon Code of Ethics references other company policies. Amongst these policies, the Canyon Supply Chain Code of Conduct and the Child and Forced Labour Policy address the topics of human trafficking, forced labour and child labour. Specifically, the Child and Forced Labour Policy addresses Modern Slavery, which is an umbrella term for specific legal concepts including forced labour, debt bondage, forced marriage, slavery and slavery-like practices and human trafficking. It is linked to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.

## Policies explicitly address trafficking in human beings, forced labour or compulsory labour and child labour

*See Disclosure of whether and how policies are aligned with relevant internationally recognised instruments*

## Workplace accident prevention policy or management system is in place

### Workplace accident prevention

Canyon has implemented thorough processes to ensure workplace safety throughout the organisation. This includes a dedicated system available to all employees via the employee portal, where they can access a variety of preventive safety documents and protocols. For example, employees can find detailed risk assessments that identify and evaluate potential workplace hazards, as well as emergency and evacuation plans that outline procedures for responding to emergencies. Additionally, Canyon recognises that mental health plays a crucial role in workplace safety and accident prevention. Stress, fatigue, and mental strain can increase the likelihood of workplace incidents, which is why Canyon's mental health program provides employees with access to support services, training, and resources to enhance their resilience and overall health. These resources are continually reviewed, updated, and refined by the Health & Safety Team to align with the latest safety standards and best practices.

Canyon has implemented a robust tracking system for workplace accidents. All incidents are documented in a digital first aid book, which is accessible to all employees via the intranet. Each incident is shared with the respective leadership team member and analysed by the Health & Safety Team with a special focus on identifying its causes and implementing preventive measures.

The preventive measures above currently cover approximately 80% of Canyon's global workforce. The program is being rolled out continuously to all international locations, in line with local Health & Safety regulations.

## Specific policies aimed at elimination of discrimination are in place

The commitment to ensuring that the workplace is free from harassment, discrimination and abuse (chapter 2.3 of the Canyon Code of Ethics) is embedded into the Canyon Code of Ethics. Discrimination, sexual harassment, and any other form of inappropriate behaviour, whether it is based on ethnicity, culture, religion, age, gender and sexual identity or orientation, are not tolerated. The Works Council was informed and briefed, and supported the implementation of the Code of Ethics. The Code of Ethics was introduced through internal communication channels, such as newsletters and roadshows, with visual materials. The Canyon Code of Ethics will be reviewed in alignment with the Canyon Environmental, Social, and Governance (ESG) Policy (Chapter IV Assigned Responsibilities). In line with the ESG Policy, policies are subject to revision every three years or sooner if required by legal changes or other circumstances that call for an immediate review. Employee representatives (E.g., Works Council) will also be consulted if changes are required based on employee feedback or experience.

## Grounds for discrimination are specifically covered in policy

*See Specific policies aimed at elimination of discrimination are in place*

### Disclosure of specific policy commitments related to inclusion and (or) positive action for people from groups at particular risk of vulnerability in own workforce

*See Specific policies aimed at elimination of discrimination are in place*

### Disclosure of whether and how policies are implemented through specific procedures to ensure discrimination is prevented, mitigated and acted upon once detected, as well as to advance diversity and inclusion

*See Specific policies aimed at elimination of discrimination are in place (For further information, please refer to Governance information: Business Conduct).*

## 7.4.3.4.3 Processes for engaging with own workers and workers' representatives about impacts

### Disclosure of whether and how perspectives of own workforce inform decisions or activities aimed at managing actual and potential impacts

Effective communication and active employee engagement are essential for fostering a collaborative and inclusive workplace. The operational responsibility for driving employee engagement initiatives, including the positive material impact of safeguarding employee mental health through Canyon's mental health program in collaboration with Fürstenberg Institute GmbH lies with the People Department, led by the Vice President People. The People Department ensures that these efforts are strategically implemented and continuously enhanced (See Disclosure of the stage at which engagement occurs, type of engagement and frequency of engagement).

### Engagement occurs with own workforce or their representatives

Several channels for communication and employee involvement are available. Canyon's employees are represented by various bodies (See Disclosure of the stage at which engagement occurs, type of engagement and frequency of engagement).

### Disclosure of the stage at which engagement occurs, type of engagement and frequency of engagement

In Germany, the Works Council (Betriebsrat) represents the interests of all Canyon employees. Its ongoing involvement is regulated in the Works Constitution Act (Betriebsverfassungsgesetz). Collective agreements are applicable for approximately 90% of Canyon's workforce based in Germany. The Youth Representation addresses the specific needs and concerns of Canyon's apprentices and dual students. Additionally, Canyon has a representative for employees with disabilities. For new hires, follow-up conversations after 100 days serve the purpose of reviewing their initial experience and addressing any concerns. Furthermore, annual individual feedback reviews with follow-up discussions support ongoing employee development and performance improvement. Canyon also engages in an ongoing dialogue with the business areas to stay informed about employee needs and preferences. Lastly, exit interviews and consulting with the employee assistance provider are important for understanding the causes of fluctuations, and to support informed management decisions and strategies that enhance employee satisfaction.

### Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens and that results inform undertaking's approach

Effective communication and active employee engagement are essential for fostering a collaborative and inclusive workplace. The operational responsibility for driving employee engagement initiatives lies with the People Department, led by the Vice President People.

### Disclosure of Global Framework Agreement or other agreements related to respect of human rights of workers

Collective agreements cover approximately 90% of Canyon's workforce in Germany. In 2023, a new collective agreement was successfully negotiated and implemented between Canyon and the IG Metal labor union. This agreement establishes a framework for regulated working conditions and structured collaboration between the company and its employees.

### Disclosure of how the effectiveness of engagement with its workforce is assessed

The effectiveness of engagement with Canyon's workforce is assessed through various mechanisms. New hire follow-up conversations at the 100-day mark provide insights into the onboarding experience and help identify areas for improvement. Annual individual feedback reviews, complemented by follow-up discussions, help to measure employee development and performance improvements. Additionally, Canyon evaluates engagement through ongoing dialogues with business areas, exit interviews, and consultations with the employee assistance provider, which offer insights into employee satisfaction, causes of turnover, and areas for improvement. These processes collectively inform management decisions and strategies to enhance workforce engagement and satisfaction.

### Disclosure of steps taken to gain insight into perspectives of people in its own workforce that may be particularly vulnerable to impacts and (or) marginalised

*See Disclosure of the stage at which engagement occurs, type of engagement and frequency of engagement*

### Statement in case the undertaking has not adopted a general process to engage with its own workforce

N/A

## 7.4.3.4.4 Processes to remediate negative impacts and channels for own workers to raise concerns

### Disclosure of general approach to and processes for providing or contributing to remedy where an undertaking has caused or contributed to a material negative impact on people in its workforce

N/A – only one positive material impact identified (For further information, please refer to General information, Material impacts, risks and opportunities and their interaction with strategy and business model). For details about channels for raising concerns via the Speak Up platform and the respective policy please refer to Governance information: Business Conduct.

### Disclosure of specific channels in place for its workforce to raise concerns or needs directly with undertaking and have them addressed

For details about channels for raising concerns via the Speak Up platform and the respective policy please refer to Governance information: Business Conduct

### Grievance or complaints handling mechanisms related to employee matters exist

For details about channels for raising concerns via the Speak Up platform and the respective policy please refer to Governance information: Business Conduct

### Disclosure of processes through which undertaking supports or requires the availability of channels

For details about channels for raising concerns via the Speak Up platform and the respective policy please refer to Governance information: Business Conduct

### Disclosure of how issues raised and addressed are tracked and monitored and how effectiveness of channels is ensured

For details about channels for raising concerns via the Speak Up platform and the respective policy please refer to Governance information: Business Conduct

### Disclosure of whether and how it is assessed that its own workforce is aware of and trust structures or processes as way to raise their concerns or needs and have them addressed

In general, the Works Council is responsible for addressing any topics raised by employees based in Germany. Based on employee feedback, the Works Council has requested and implemented several works agreements. Specifically, hybrid work arrangements were completed in 2024, and learning and development initiatives are currently in progress.

### Policies regarding protection against retaliation for individuals that use channels to raise concerns or needs are in place

For details about channels for raising concerns via the Speak Up platform and the respective policy, please refer to Governance information: Business Conduct.

## 7.4.3.4.5 Actions and resources in relation to own workforce

### Disclosure of key action

In 2024, Canyon took several key actions to promote employee health and mental well-being. These included launching a global e-learning platform to ensure access to learning for its entire workforce, and improving training access for factory and warehouse workers. Canyon also integrated safety training into the onboarding process for new employees in Germany, providing tailored role-specific training. Safety training sessions were conducted to maintain high safety awareness across all roles, supported by accessible safety materials at higher-risk locations. To address mental health, Canyon dedicated the entire month of May 2024 to Mental Health Awareness in the US, offering activities such as yoga classes. Additionally, Canyon is planning to introduce long-term measures, including reducing working hours to 37.5 hours per week with full wage compensation by 2028 and expanding employee benefits, such as voluntary accident insurance (For further information, please refer to Social information: Own workforce, 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).

### Description of scope of key action

In 2024, Canyon launched key initiatives to enhance employee health and mental well-being. These measures included the introduction of a global e-learning platform to ensure training availability across its global workforce, as well as improving access to training resources for factory and warehouse workers. Additionally, Canyon implemented safety training during the onboarding process for new employees in Germany, focusing on role-specific safety practices. Safety training sessions were also conducted for all employees, with accessible safety materials available at higher-risk locations. mental health awareness activities, such as yoga classes, were organized in the US to highlight the importance of mental well-being (For further information, please refer to Social information: Own workforce, 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).

### Time horizon under which key action is to be completed

In 2024, Canyon implemented initiatives aimed at enhancing employee well-being, including the introduction of a global e-learning platform to provide learning opportunities to the global workforce and improved access to training for factory and warehouse employees. Additionally, Canyon integrated safety training into the onboarding process for new employees in Germany, ensuring they are informed about safety procedures. Canyon also dedicated May 2024 to Mental Health Awareness in the US, offering activities such as on-site yoga classes. To further support employee well-being, Canyon plans to reduce regular working hours to 37.5 hours per week with full wage compensation by 2028 and to invest in additional employee benefits, such as voluntary accident insurance (For further information, please refer to Social information: Own workforce, 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).

### Disclosure of the type of current and future financial and other resources allocated to the action plan

In 2024, Canyon invested approximately 30,000€ in measures related to the Fürstenberg mental health program.

Operational expenditures (OPEX) and capital expenditures (CAPEX) are set to remain below the established financial threshold.

### Description of action taken, planned or underway to prevent or mitigate negative impacts on own workforce

N/A – only one positive impact identified (For further information, please refer to General information, Material impacts, risks and opportunities and their interaction with strategy and business model)

### Disclosure on whether and how action has been taken to provide or enable remedy in relation to actual material impact

N/A – only one positive material impact identified (For further information, please refer to General information, Material impacts, risks and opportunities and their interaction with strategy and business model)

## Description of additional initiatives or actions with primary purpose of delivering positive impacts for own workforce

The following initiatives, implemented in 2024, are directly connected to the positive material impact of protecting employee mental health, which is addressed within Canyon's own operations through the mental health program in collaboration with Fürstenberg Institute GmbH.

In August 2024, Canyon launched a new global e-learning platform to make learning available throughout its global workforce. Also, factory and warehouse workers are given time and space to train and learn with improved access to computers.

As part of Canyon's commitment to health and safety, and as a preventive measure for all new employees based in Germany, Canyon incorporates training into the onboarding process. During this phase, individuals receive tailored training specific to their roles, with an emphasis on safety practices relevant to their job functions. This early training is intended to ensure that employees are well-informed about safety procedures from the outset of their employment. Canyon's leadership team is also trained by the Health & Safety Team. To maintain a high level of safety awareness, Canyon conducts additional training sessions throughout the employment. These sessions cover a range of topics, from general safety procedures to specific hazards associated with particular job roles. Information and additional material (e.g. instructions, safety sheets, handbooks, etc.) is also available at locations with higher risk factors, such as the Canyon factory, to provide employees with immediate access to critical safety information. These preventive measures focused initially on Germany, and will be rolled out to other Canyon locations starting next year, in line with Canyon's international expansion plans.

Understanding that a healthy mind is crucial for productivity, creativity, and overall job satisfaction, Canyon US dedicated the entire month of May 2024 to Mental Health Awareness, with various activities recognizing the importance of mental wellbeing, for example on-site yoga classes.

## Description of how effectiveness of actions and initiatives in delivering outcomes for own workforce is tracked and assessed

Canyon conducts a quarterly evaluation of its corporate mental health program to ensure its effectiveness and continuous improvement. This assessment, carried out in collaboration with the Fürstenberg Institute, is based on key performance indicators (KPIs) that track and assess the initiative's impact and effectiveness. By protecting employees' mental health through Canyon's mental health program with Fürstenberg Institute GmbH, the company aims to positively influence their well-being. Additionally, the evaluation is complemented by voluntary feedback gathered directly from program participants. Given the users' highly individual needs, Canyon's approach must not follow a one-size-fits-all standard practice. Instead, the goal of the assessment is to reflect the diverse and personal nature of mental health challenges. The KPIs are collected and shared with Canyon twice a year, with the utmost respect for confidentiality and anonymity. The Key Performance Indicators (KPI) include:

- Utilisation Rates: Frequency and patterns of service usage.
- Employee Satisfaction: Feedback on the quality and impact of the services provided.
- Program Outcomes: Assessments of improvements in mental health and wellbeing.

Data protection is guaranteed by compliance with the General Data Protection Regulation (GDPR).

Moreover, no personal data will be shared with Canyon. The report is based on numbers only, with no possibility of identifying individuals or groups of people.

## Description of process through which it identifies what action is needed and appropriate in response to particular actual or potential negative impact on own workforce

N/A – only one positive material impact identified (For further information, please refer to General information, Material impacts, risks and opportunities and their interaction with strategy and business model)

## Description of what action is planned or underway to mitigate material risks arising from impacts and dependencies on own workforce and how effectiveness is tracked

N/A – only one positive material impact identified (For further information, please refer to General information, Material impacts, risks and opportunities and their interaction with strategy and business model)

## Description of what action is planned or underway to pursue material opportunities in relation to own workforce

In the mid-term, Canyon plans to introduce additional measures to support employee health and safety. These initiatives include reducing regular working hours, as outlined in the collective agreement, to 37.5 hours per week with full wage compensation by 2028. This aims to create an attractive working environment for skilled labour, and enhance employee wellbeing. Canyon is also investing in individual employee benefits, such as voluntary accident insurance, which not only covers work-related incidents but also provides the significant advantage of covering private accidents.

## Disclosure of whether and how it is ensured that own practices do not cause or contribute to material negative impacts on own workforce

Based on a collective agreement negotiated with the Works Council, Canyon closely monitors employee attrition and sickness leave rates in Germany. We systematically monitor these metrics to identify potential risks or emerging trends that may impact our workforce. Canyon's goal in analysing this data is to be able to implement targeted interventions to address potential issues. In particular, in 2024, Canyon focused on managing working hours to prevent overwork and support adequate and sufficient recovery times for its employees. To support this goal, Canyon has introduced a traffic light system that monitors working time and indicates when employees may need additional rest.

## Disclosure of resources allocated to the management of material impacts

A designated member of the People Team, under the lead of the Vice President People, serves as the primary contact for the Fürstenberg Institute, and handles all inquiries related the program, ensuring seamless coordination and support.

### 7.4.3.4.6 Tracking effectiveness of policies and actions through targets

## Relationship with policy objectives

The Canyon Code of Ethics is closely aligned with the positive material impact of protecting employee mental health, which is addressed within Canyon's own operations through the mental health program in collaboration with Fürstenberg Institute GmbH.

#### Canyon Code of Ethics

The Canyon Code of Ethics forms the basis of our collaboration, giving guidance to the entire workforce about desired behaviours and non-tolerated behaviours at Canyon. It supports the company goal of creating an environment that empowers Canyon employees to deliver top-tier performance. Specifically, chapter 2 of the Canyon Code of Ethics outlines the commitment to the Occupational Health and Safety of the workforce: "It's of paramount importance for us to safeguard the health and safety of our employees at Canyon. We want the workplace to be a place that respects both the physical and mental health of our employees."

## Measurable target

Canyon does not set specific or time-bound targets for the utilisation rate of its mental health program, as participation is voluntary and maintaining anonymity is a top priority. Nonetheless, the company is committed to supporting employee well-being and monitors the program's usage through regular reporting (For further information, please refer to Social information: Own Workforce, Description of how effectiveness of actions and initiatives in delivering outcomes for own workforce is tracked and assessed). Increases in utilisation rates are observed following targeted awareness and communication initiatives, such as informational events or campaigns aimed at promoting the program among employees.

## Nature of target

Canyon's primary goal at this point is to increase awareness of the program and ensure that all employees know how to access the services offered.

## Description of scope of target

Canyon's primary goal is to increase awareness of its mental health program and ensure that all employees understand how to access the services provided. To achieve this, Canyon implements various measures, including prominently placing and linking the program on the internal learning platform, hosting online information sessions led by the Fürstenberg Institute (accessible without prior registration), and distributing posters and flyers. Additionally, twice a year, physical information booths are set up at all Koblenz locations to provide direct access to program details. Canyon plans to introduce internal "People Ambassadors" to promote the mental health program across markets and additional locations. This initiative is scheduled for implementation in Q2 2025.

### Baseline value

There is no specific or time-bound target regarding the utilisation rate of the mental health program, as the service is voluntary and anonymity a top priority.

### Baseline year

There is no specific or time-bound target regarding the utilisation rate of the mental health program, as the service is voluntary and anonymity a top priority.

### Period to which target applies

There is no specific or time-bound target regarding the utilisation rate of the mental health program, as the service is voluntary and anonymity a top priority.

### Indication of milestones or interim targets

Canyon will continue to take steps to ensure the program is known and accessible, and quarterly evaluate how Canyon can improve its offerings to meet the needs of its workforce. To improve the visibility and accessibility of the program, Canyon will continue to enhance its communication about the programme through newsletters, the intranet and direct communications, e.g. in team meetings.

### Disclosure of how stakeholders have been involved in target setting

Canyon is working closely with its leadership to foster a supportive and open culture where the mental health program is viewed positively and perceived as a tool for employee wellbeing.

## 7.4.3.4.7 Characteristics of the undertaking's employees

### Employees, by gender (headcount)

| Gender | # of employees |
|---|---|
| Women | 397 |
| Men | 1,239 |
| Other | 23 |
| Not Disclosed | 0 |
| Total | 1,659 |

### Employees, by contract type, by gender (FTE)

| Type | Gender | # of employees | Average # of employees |
|---|---|---|---|
| Permanent employees | Women | 294.10 | 303.20 |
| Permanent employees | Men | 996.80 | 998.70 |
| Permanent employees | Other | 19.00 | 12.80 |
| Temporary employees | Women | 40.10 | 41.30 |
| Temporary employees | Men | 115.40 | 131.00 |
| Temporary employees | Other | 1.10 | 0.90 |
| Non-guaranteed hours employees | Women | 10.50 | 11.00 |
| Non-guaranteed hours employees | Men | 35.10 | 34.60 |
| Non-guaranteed hours employees | Other | 0.30 | 0.30 |

### Employees, by countries with 50 or more employees (FTE)

| Country with 50 or more employees (representing at least 10% of total number of employees) | # of employees | Average # of employees |
|---|---|---|
| Germany | 1,183.1 | 1,201.00 |
| United States | 95.10 | 100.70 |
| Netherlands | 75.50 | 75.50 |

## 7.4.3.4.8 Methodologies and assumptions used to compile the data

### Describe the methodologies and assumptions used to compile the data, including whether the numbers are reported: i. in headcount, full-time equivalent (FTE), or using another methodology; ii. at the end of the reporting period, as an average across the reporting period, or using another methodology

Canyon reports its workforce data in full-time equivalents (FTE). FTEs are determined based on the agreed standard weekly working hours for each respective market and the actual working hours of each employee. Changes to FTE status are recorded continuously, allowing for real-time analysis based on average values. Where workforce data is specifically required in headcount, Canyon provides the information accordingly; otherwise, FTE is used as the standard reporting metric.

### Report contextual information necessary to understand the data reported on employee demographic

Employee demographic data is tracked through an HR IT system and is analyzed and evaluated by the People Department, under the leadership of the Vice President People. The definitions used for this data collection are consistent across all markets and align with the requirements of German labor law, ensuring a uniform and legally compliant basis for the reported data.

### Disclosure of cross-reference of information reported under paragraph 50 (a) to most representative number in financial statements

The information required under paragraph 50 (a) is cross-referenced in the appendix to the financial statement under “F Other Disclosures / Average Number of Employees (FTE)”.

### Number of employees (headcount)

1,660.00

### Average number of employees (headcount)

1,675.70

## 7.4.3.4.9 Turnover rate

### Number of employee who have left the undertaking

177

### Percentage of employee turnover

12.00 %

### Explanation percentage of employee turnover

Canyon calculates the total number of leavers by summing both voluntary and involuntary departures, while excluding fixed-term contracts. According to the ESRS S1 standard, voluntary departures refer to employees who leave the organisation at their own request, which includes resignations and retirements. In contrast, involuntary departures refer to employees who leave the organisation without their consent, encompassing layoffs, dismissals, and contract terminations.

The turnover rate is calculated as follows:

Turnover rate = (Total leavers in 2024 / Average number of employees in 2024) x 100

## 7.4.3.4.10 Fatalities

### Number of fatalities in own workforce as result of work-related injuries and work-related ill health

0.00

### Number of fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites

0.00

### Number of fatalities in own workforce as result of work-related injuries

0.00

### Number of fatalities in own workforce as result of work-related ill health

0.00

## 7.4.3.4.11 Health and safety

### Percentage of people in its own workforce who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines

80.00 %

### Explanation percentage of people in its own workforce who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines

Approximately 80% of employees are currently covered by the health and safety management system. The focus has been on Germany and will be extended to other Canyon sites next year in line with Canyon's international expansion plans. Coverage is based on the Occupational Health and Safety Act §1 and applies to all operations in Germany.

## 7.4.3.4.12 Recordable work-related accidents

### Rate of recordable work-related accidents for own workforce

0.9%

### Number of recordable work-related accidents for own workforce

14.00

## Explanation number of recordable work-related accidents for own workforce

### Recording of occupational accidents

According to the Occupational Safety and Health Act §6, all accidents at work must be documented. At Canyon, documentation is managed via a digital first aid book. Every employee has access to it. Either by barcode (on each first aid book) or via the Canyon employee portal.

### Analysis of accident statistics

The entire health and safety system is based on the principle of risk analysis. In order to correctly classify risks, it is necessary to investigate and evaluate accidents and, if necessary, occupational illnesses.

Accident statistics are therefore compiled on a monthly basis in order to identify the causes of accidents. The analysis is based on the digital first aid book and an Excel file. The basis is the Occupational Health and Safety Act §6.

## 7.4.3.4.13 Incidents of discrimination, complaints and corrective actions taken

## Total number of incidents of discrimination during the reporting period

10

## Number of complaints filed through channels for people in own workforce to raise concerns

29.00

## Number of complaints filed to National Contact Points for OECD Multinational Enterprises

0.00

## Disclosure of contextual information necessary to understand data and how data has been compiled (work-related grievances, incidents and complaints related to social and human rights matters)

In the reporting period, 29 cases were submitted through the reporting channels, which are available to all employees (for further information, please refer to Chapter G1 Business Conduct), by the company's own workforce. These cases covered a range of issues, including 10 cases of discrimination (accounting for 34% of all reported cases), 2 cases of fraud, 2 cases related to working hours, 1 case concerning health and safety, and 14 cases categorized as 'Others,' which addressed various topics. Each case was thoroughly investigated, with appropriate measures, including disciplinary actions, taken as necessary. By the end of the reporting period in 2024, 97% of the cases reported during this time had been closed and resolved, with no financial penalties resulting from reported cases of discrimination.

## Total number of incidents of discrimination during the reporting period

10

## Number of complaints filed through channels for people in own workforce to raise concerns

29.00

## Number of complaints filed to National Contact Points for OECD Multinational Enterprises

0.00

## Disclosure of contextual information necessary to understand data and how data has been compiled (work-related grievances, incidents and complaints related to social and human rights matters)

In the reporting period, 29 cases were submitted through the reporting channels, which are available to all employees (for further information, please refer to Governance information: Business Conduct), by the company's own workforce. These cases covered a range of issues, including 10 cases of discrimination (accounting for 34% of all reported cases), 2 cases of fraud, 2 cases related to working hours, 1 case concerning health and safety, and 14 cases categorized as 'Others,' which addressed various topics. Each case was thoroughly investigated, with appropriate measures, including disciplinary actions, taken as necessary. By the end of the reporting period in 2024, 97% of the cases reported during this time had been closed and resolved, with no financial penalties resulting from reported cases of discrimination.

## 7.4.3.4.14 Legal proceedings, fines and settlements associated with employment discrimination

### Amount of material fines, penalties, and compensation for damages as result of violations regarding social and human rights factors

0.00 EUR

### Information about reconciliation of material fines, penalties, and compensation for damages as result of violations regarding social and human rights factors with most relevant amount presented in financial statements

*See Disclosure of contextual information necessary to understand data and how data has been compiled (work-related grievances, incidents and complaints related to social and human rights matters)*

Additionally, no severe human rights violations have been reported within Canyon's workforce during the reporting period.

## 7.4.3.4.15 Incidents, complaints and severe human rights impacts

### Number of severe human rights issues and incidents connected to own workforce

0.00

### Number of severe human rights issues and incidents connected to own workforce that are cases of non respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises

0.00

### No severe human rights issues and incidents connected to own workforce have occurred

*See Disclosure of contextual information necessary to understand data and how data has been compiled (work-related grievances, incidents and complaints related to social and human rights matters)*

Additionally, no severe human rights violations have been reported within Canyon's workforce during the reporting period.

### Amount of material fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce

0.00 EUR

### Information about reconciliation of amount of material fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce with most relevant amount presented in financial statements

*See Disclosure of contextual information necessary to understand data and how data has been compiled (work-related grievances, incidents and complaints related to social and human rights matters)*

Additionally, no severe human rights violations have been reported within Canyon's workforce during the reporting period.

# 7.4.3.5 Social Information: Workers in the Value Chain

## 7.4.3.5.1 Value chain workers who are likely to be materially impacted by the undertaking

### Description of types of value chain workers subject to material impacts

Several stages of Canyons value chain involve workers who are not employed by Canyon. Workers provided by third party undertakings who work for Canyons own operations include mainly bike assemblers in the Koblenz factory, and pickers as well as generalists in the logistics department. Workers in Canyons upstream value chain who are not employed by Canyon engage in a wide variety of different tasks along the value chain. Some key tasks include raw material extraction, production of intermediate materials and components, and assembly of parts and bikes. Workers in the downstream value chain engage mainly in logistics activities. Depending on the tasks performed, the country of operation and the materials handled, workers could potentially be affected by material impacts.

### All value chain workers who can be materially impacted by undertaking are included in scope of disclosure under ESRS 2

*See Description of types of value chain workers subject to material impacts*

### Type of value chain workers subject to material impacts by own operations or through value chain

Several stages of Canyon´s value chain involve workers who are not employed by Canyon. Workers provided by third party undertakings who work for Canyon's own operations include mainly bike assemblers in the Koblenz factory, and pickers as well as generalists in the logistics department. Workers in Canyon's upstream value chain who are not employed by Canyon engage in a wide variety of different tasks along the value chain. Some key tasks include raw material extraction, production of intermediate materials and components, and assembly of parts and bikes. Workers in the downstream value chain engage mainly in logistics activities. Depending on the tasks performed, the country of operation and the materials handled, workers could potentially be affected by material impacts.

#### Migrant workers

Canyon identified migrant workers as one of the most vulnerable groups in the value chain. The human rights risk assessment, third party social audits, and media research led to the conclusion that the vulnerability of migrant workers in the Canyon supply chain can be associated with structural conditions in the country of origin, as well as in the country of destination. This also relates to the absence of global, regional or bilateral policy agreements on the global movement of labour. As for migrant workers, individual conditions, such as a lack of knowledge of the local language or of the rights and laws in the country of destination, or a lack of a safety network can contribute to their vulnerability. With regard to Asia, which has been identified as a high-risk region, most foreign migrant workers in the Canyon value chain come from Vietnam, Thailand and Indonesia. Migrant workers from these regions might be charged recruitment fees in the origin country, as well as service fees in the destination region. Domestic migrants – migrants within a country travelling from one region to another for work – are most prevalent in China and Vietnam.

#### Health and safety

The impacts are material along Canyon's whole value chain. Regarding Occupational Health and Safety (OHS), it must be noted that a negative impact of injuries is considered as inherent in all production locations due to the nature of the work performed. Hazards can occur for example when handling chemical substances, when using machines, or due to human error.

#### Working time

Working hours-related impacts at direct Canyon business partners are mainly allocated in Asia, and can generally be classified as a systemic issue with a lot of interdependencies: minimum wage not being a living wage, production planning, and purchasing practices can all potentially influence working hours.

### Disclosure of geographies or commodities for which there is significant risk of child labour, or of forced or compulsory labour, among workers in undertaking's value chain

Based on a 2024 in-depth human rights risk assessment, Canyon identified an inherent risk for forced and child labour in South America, Asia and North America in Canyon's upstream supply chain. Through the risk assessment, Canyon also identified some commodities with an inherent risk for forced and child labour, including aluminium, natural rubber, electronics, cobalt, copper, and polysilicon.

## Material negative impacts occurrence (value chain workers)

Material impacts related to workers in the value chain have been identified in a double materiality assessment, details of which are described in the chapter General information, ESRS 2. To address supply chain due diligence, specifically in connection with Human Rights, Canyon conducted an in-depth risk assessment, which was part of its 2024 Human Rights Due Diligence process. The risk assessment results fed into the double materiality assessment. Through this process, Canyon has identified four material negative impacts within its upstream value chain, associated with the ESRS sub-topics Working conditions and other work-related rights. These material impacts are:

- Actual negative impact on occupational health and safety at direct business partners and potential impacts beyond direct suppliers in the deeper value chain.
- Actual negative impact on regular working hours and overtime at direct business partners and potential impact in the deeper value chain
- Potential human rights violations beyond direct business partners in the deeper value chain related to forced labour and child labour
- Modern slavery indicators at direct business partners

All the identified negative impacts are widespread and systemic. No risks or opportunities have been identified.

## Description of activities that result in positive impacts and types of value chain workers that are positively affected or could be positively affected

N/A

## Description of material risks and opportunities arising from impacts and dependencies on value chain workers

N/A

## Disclosure of whether and how the undertaking has developed an understanding of how workers with particular characteristics, those working in particular contexts, or those undertaking particular activities may be at greater risk of harm

Material impacts related to workers in the value chain have been identified in a double materiality assessment, details of which are described in the chapter General information, ESRS 2. To address supply chain due diligence, specifically in connection with Human Rights, Canyon conducted an in-depth risk assessment, which was part of its 2024 Human Rights Due Diligence process. The risk assessment results fed into the double materiality assessment. Through this process, Canyon has identified four material negative impacts within its upstream value chain, associated with the ESRS sub-topics working conditions and other work-related rights. The 2024 risk approach was twofold: As a first step, the risk assessment was informed by indices from Canyon's 3rd party end-to-end due diligence platform and international child and forced labour reports published by the U.S. Department of Labor, sanction lists, and news monitoring through Sentinel for social and environmental scoring. Sector-specific and country risks were considered. In a second step, the concrete risk assessment targeted the production location level, assigning corresponding inherent risk ratings to each production location by taking into account Canyon's available value chain data. Due to limited supply chain transparency, analysis was mostly confined to the production locations and subcontracted operations of direct business partners. However, the severity (scale, scope, remedy) of specific human rights risks was assessed for the entire value chain using the available data.

## Disclosure of which of material risks and opportunities arising from impacts and dependencies on value chain workers are impacts on specific groups

N/A

## 7.4.3.5.2 Policies adopted to manage impacts, risks and opportunities related to value chain workers

### Policies to manage material impacts, risks and opportunities related to workers in the value chain, including for specific groups of value chain workers or all value chain workers

Canyon developed several policies that aim to set clear standards for doing business. The following policies are globally applicable, and available in the compliance section of canyon.com: the Supply Chain Code of Conduct covers all material impacts, whilst the Child and Forced Labour Policy relates to the child and forced labour impact. The Speak Up Policy (For further information about the Speak Up Policy, please refer to Chapter G1 Business Conduct) facilitates access to Canyon's grievance mechanism, where all impacts can be reported anonymously.

### Description of key contents of policy

#### Supply Chain Code of Conduct

Canyon requires all suppliers, business partners and their subcontractors to comply with the principles reflected in the Supply Chain Code of Conduct. The general objective of the Supply Chain Code of Conduct is to define the baseline for doing business together, as we believe that business should not be done at all costs. Rather, it requires appropriate conditions and circumstances, particularly respect for human rights and environmental protection, as well as fair, open and honest relationships with partners. The code refers to legal and human rights requirements that Canyon commits to uphold together with its supply chain partners. This commitment is a pre-condition to entering into a contractual relationship between Canyon and its suppliers or business partners. This policy covers all material topics related to workers in the value chain: Actual and potential Occupational Health and Safety impacts along the value chain, actual and potential impacts connected to regular working hours and overtime along the whole value chain, potential forced labour in the deeper upstream value chain and actual modern slavery indicators at direct business partners. For further information about the identified impacts, please refer to the actions specified in this standard and to ESRS 2.

#### Child and Forced Labour Policy

Canyon and its affiliated companies have a zero-tolerance policy towards any form of forced or child labour. The general objective of the Child and Forced Labour Policy is to reflect Canyon's commitment to act ethically, respectfully and with integrity. The policy lays out the definitions of child and forced labour, clear requirements concerning preventive measures, enhanced due diligence requirements for suppliers at risk of operating in areas of state-imposed forced labour, and in the case of non-compliances with the policy being suspected or detected in its supply chain, it defines remediation measures. Canyon works together with supply chain partners and a non-governmental organization (NGO) to prevent, mitigate, and remediate violations of human rights in any form (Read more about the interviews and surveys in the Social information: Workers in the Value Chain, 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). This policy covers specifically material impacts related to potential forced labour in the deeper upstream value chain and the material topic of actual modern slavery indicators (such as recruitment fees) in the upstream value chain at direct business partners.

### Description of scope of policy or of its exclusions

These policies apply to all workers in Canyon's upstream and downstream value chain.

### Description of most senior level in organisation that is accountable for implementation of policy

The responsibility for the implementation and enforcement of the policies is headed by the Global Director ESG, while the Chief Executive Officer (CEO) is responsible for monitoring the status of implementation and enforcement of the policies together with the Global Director ESG. The approval and review of policies in general has been assigned to the Advisory Board (For further information about the Speak Up Policy, please refer to Governance information: Business Conduct).

### Disclosure of third-party standards or initiatives that are respected through implementation of policy

The Canyon Supply Chain Code of Conduct was drafted based on international regulations and internationally recognised standards. These include, at a minimum, the International Bill of Human Rights, the Declaration of Fundamental Principles and the Rights at Work of the International Labour Organisation (ILO) and its fundamental Conventions. The UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct are the main frameworks that guide Canyon's due diligence processes. Standards considered in the Child and Forced Labour Policy are the ones referred to in the Supply Chain Code of Conduct as well as the Dhaka Principles for migration with dignity due to the vulnerability of migrant workers.

## Description of consideration given to interests of key stakeholders in setting policy

Key stakeholders were considered in the alignment of international human rights standards within Canyon's policies, ensuring that their interests are represented and their rights protected. As formalised in the Environmental, Social and Governance Policy, Canyon's policies shall be revised every 3rd year or ad hoc if required due to legal requirements or other circumstances which would require such a review (for further information about the Environmental, Social, and Governance Policy, please refer to Governance information: Business Conduct). The policies referenced in this section were last updated in 2022 and reviewed by an independent consultancy specializing in human rights to ensure alignment with key human rights standards. All Canyon policies shall be revised every 3rd year or ad hoc if required due to legal requirements or other circumstances which would require such a review.

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

Canyon educates and informs Canyon staff about ESG policies and commitments. As formalized in the Canyon Code of Conduct, the company encourages supply chain partners to appoint someone in their own organisation to be responsible for the implementation of the requirements outlined in the Canyon policies, including making their content available to all workers, and making sure that training is provided where needed to facilitate compliance with all legal, human rights and environmental requirements. Additionally, Canyon expects its partners to monitor such implementation and upon request, to report on progress. The Supply Chain Code of Conduct and the Child and Forced Labour Policy are available under Compliance at Canyon | CANYON DE.

## Description of relevant human rights policy commitments relevant to value chain workers

Introduced in 2023, the Canyon Human Rights Programme defines the procedures for implementing the due diligence approach at Canyon. The programme is based on the United Nations Guiding Principles for Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct frameworks. Canyon follows the Human Rights Due Diligence process steps as outlined in the OECD Due Diligence Guidance for responsible Business Conduct. Detailed process steps are outlined Disclosure of general approach in relation to respect for human rights relevant to value chain workers".

## Disclosure of general approach in relation to respect for human rights relevant to value chain workers

### Canyon Human Rights Programme

Engagement, Transparency & Commitment: To ensure compliance with Canyon's human rights policy commitments and international standards, all suppliers are onboarded onto the Human Rights Programme. During this process, suppliers are required to acknowledge Canyon's Human Rights Policies and provide details and evidence to the Canyon ESG team, such as certificates, audit reports, questionnaires etc. Canyon requires all suppliers to formally acknowledge and sign the Supply Chain Code of Conduct and the Child and Forced Labour Policy. This acknowledgement is a pre-condition for entering into a contractual relationship with Canyon.

Risk and Impact Assessment: To identify risks for human rights violations within relevant regions, materials, products and production locations, Canyon conducts both yearly and ad hoc risk assessments. These assessments are based on internationally recognized Human Rights key indicators and social audit results. Canyon then prioritises monitoring, remediation, and preventive measures. This is done based on the severity level of the actual or potential impacts.

Monitoring/ Social Audits: The formalised Human Rights Programme sets out the rules for monitoring production locations and how Canyon collaborates with suppliers to stop, prevent and mitigate potential and actual human rights violations. Social audits are a central part of the Canyon human rights due diligence process. The objective of social audits is to evaluate compliance with local laws and regulations and international labour standards, with the aim of identifying and consequently mitigating adverse human rights impacts and risks. In 2024, Canyon prioritised production locations for social auditing that were identified as high-risk locations during the risk assessment. Five main pillars were assessed during the audits: health and safety, environment, business ethics, management systems and labour. The audits are conducted by an Association of Professional Social Compliance Auditors (APSCA) independent third-party monitoring firm to ensure that the process is impartial.

Corrective Action Plan (CAPA): After the social audit is completed, the supplier is requested to develop and implement a time-bound corrective action plan (CAPA) addressing any findings observed during the social audits, or any issues observed by other monitoring processes. Those processes can include worker sentiment, LRQA EIQs Sentinel media monitoring system, and internal checklists to track observations from site visits and identify concerns.

The development of a CAPA includes assessing the root cause, proposing immediate corrective actions and long-term preventive actions, setting clear targets and responsibilities for the subsequent implementation, and aiming to establish a continuous improvement process. Canyon supports suppliers during the development of the CAPA, and communicates about progress made and potential challenges related to the implementation of the CAPA with suppliers.

Any instances of non-compliance classified as zero-tolerance must be addressed without delay, and are followed up on by Canyon and the supplier to ensure appropriate remediation.

Human Rights Capacity Building: In recurring calls with suppliers, Canyon explores evidence and discusses the status of the implementation of corrective actions with a focus on the highest severity issues. Canyon aims to support suppliers in their capacity-building process, aiming for long term compliance. Canyon also facilitates awareness raising and technical trainings for suppliers.

Communication: We communicate about actions taken and progress made in the compliance section of canyon.com, in line with the requirements of the following international legislation: UK Modern Slavery Act, the California Transparency in Supply Chain Act, the Norwegian Transparency Act, the Australian Modern Slavery Act and the Canadian Fighting Against Forced Labour in the Supply Chain Act.

In 2024, 41 social audits were processed for production locations in Asia and Europe, covering approximately 21% of the high-risk production locations of Canyon's direct suppliers. These 41 audits assessed the working conditions of approximately 25.000 workers in the supply chain and identified 563 instances of non-compliance with applicable laws, regulations and Canyon's policy requirements. Non-compliances were mainly related to the Health & Safety pillar (62%), with Chemical Management and Emergency Preparedness identified as the key areas of improvement. The remaining non-compliances were related to Labor (25%), Management Systems (9%), Environment (3%), and Business Ethics (1%) topics. In total, Canyon monitored a total of 75 production locations, including locations that were audited in previous years. The audit cadence is dependent on the audit outcome and extends from either one year over two or three to four years.

## Disclosure of general approach in relation to engagement with value chain workers

As part of the social audits, the independent auditors conduct private, confidential and voluntary worker interviews, and, where indicated, all workers are invited to participate in a worker sentiment assessment to receive feedback and insights regarding general working conditions.

## Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts

General approach: Canyon's Human Rights Programme clearly defines the steps required to ensure appropriate mitigation of risks, or remediation of actual impacts. Canyon requires time-bound corrective action plans to be developed by the suppliers, and collaborates with them to help them identify the root cause of the issues, together with the appropriate immediate corrective actions and long-term preventive actions, setting implementation timelines and allocating clear responsibilities. Canyon follows up on the implementation of the actions in meetings with the suppliers where they share evidence and details of the implementation. New social audits are conducted to formally confirm the effective implementation of the corrective actions, and ensure sustained compliance.

Specific approach: The Canyon Child and Forced Labour Policy details the investigation and remediation process applicable for non-compliances regarding modern slavery: In case of the occurrence and reporting of harm, an investigation at site level shall be conducted. In the event of legal violations, the respective local regulators must be informed by the supplier. The analysis and remediation process shall be assisted by appropriate expertise. Canyon is committed to following up on the investigation and remediation process until non-compliances are fully remediated. This includes a root cause analysis together with the affected company, designed to prevent further cases of non-compliance by implementing preventive measures.

Canyon works together with supply chain partners and an NGO to prevent, mitigate, and remediate violations of human rights in any form (For further information, please refer to Social information: Workers in the Value Chain, 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).

## Policies explicitly address trafficking in human beings, forced labour or compulsory labour and child labour

Canyon and its affiliated companies have a zero-tolerance policy towards any form of forced or child la-bour. The general objective of the Child and Forced Labour Policy is to reflect Canyon's commitment to act ethically, respectfully and with integrity. The policy lays out the definitions of child and forced labour, clear requirements concerning preventive measures, enhanced due diligence requirements for suppliers at risk of operating in areas of state-imposed forced labour, and in the case of non-compliances with the policy being suspected or detected in its supply chain, it defines remediation measures. The Supply Chain Code of Conduct also addresses human trafficking, as it states that employment must be freely chosen.

## Undertaking has supplier code of conduct

Yes – See Description of key contents of policy

## Disclosure of whether and how policies are aligned with relevant internationally recognised instruments

The Canyon Supply Chain Code of Conduct was drafted based on international regulations and internation-ally recognised standards. These include, at a minimum, the International Bill of Human Rights, the Declaration of Fundamental Principles and the Rights at Work of the International Labour Organisation (ILO) and its fundamental Conventions. The UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct are the main frameworks that guide Canyon's due diligence processes. Standards considered in the Child and Forced Labour Policy are the ones referred to in the Supply Chain Code of Conduct as well as the Dhaka Principles for migration with dignity due to the vulnerability of mi-grant workers. Introduced in 2023, the Canyon Human Rights Programme defines the procedures for implementing the due diligence approach at Canyon. The programme is based on the United Nations Guiding Principles for Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct frameworks. Canyon follows the Human Rights Due Diligence process steps as outlined in the OECD Due Diligence Guidance for responsible Business Conduct.

### Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve value chain workers

In 2024, Canyon did not receive any reports through its grievance mechanism from value chain workers, neither were any severe cases reported. The mechanism was established at the end of 2023, and initial efforts have been made in 2024 to increase the accessibility of the mechanism.

## 7.4.3.5.3 Processes for engaging with value chain workers about impacts

### Disclosure of how perspectives of value chain workers inform decisions or activities aimed at managing actual and potential impacts

In 2023 and 2024, risk-based worker sentiment surveys were conducted, complementing the interviews that are part of the social audits process that engages with value chain workers. Workers are encouraged by posters in the facility to scan a QR code, which directs them to an anonymous survey in relevant languages. The system is managed and hosted by a third-party service provider. The survey questions address both actual and potential impacts workers may be affected by.

The interviews and the worker sentiment surveys are related to all material impacts affecting workers in the value chain. Questions about those impacts are embedded in both formats, including topics such as working hours, workplace conditions, safe working environment. For further information about the identified impacts, please refer to the actions specified in this standard and to ESRS 2.

### Engagement occurs with value chain workers or their legitimate representatives directly, or with credible proxies

Although Canyon does not directly engage with supply chain workers, we gathered insights through interviews as part of the social audit process, and from anonymous worker sentiment surveys. Both tools can highlight risks and high priority issues from a workers' point of view, specifically the most vulnerable groups. It is therefore especially important that worker sentiment surveys are carried out in regions with a high percentage of foreign migrant workers.

Furthermore, Canyon engages with migrant workers in high-risk areas through an additional assessment. The Foreign Migrant Worker Assessment is an add-on to the social audit process conducted by a third-party monitoring firm, and provides further visibility into the risks and impacts foreign migrant workers face in the supply chain. It covers the topics of management systems, recruitment and deployment, employment, and return or onward migration, and provides full details of the number of workers, their nationalities, and any violations observed, together with a review of the documents and records and voluntary, private and confidential worker interviews, which are conducted in their own language with the use of translation services.

### Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement

*See Disclosure of how perspectives of value chain workers inform decisions or activities aimed at managing actual and potential impacts*
*See Engagement occurs with value chain workers or their legitimate representatives directly, or with credible proxies*

### Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens and that results inform undertakings approach

At Canyon the Human Rights Officer (a role required by the German Supply Chain Act) is responsible for overseeing the activities in relation to workers in the supply chain. The duties of the Human Rights Officer are carried out by the Chief Executive Officer (CEO), who is also responsible for validating the human rights risk management approach and therefore also for the process of engaging with value chain workers.

### Disclosure of Global Framework Agreement or other agreements related to respect of human rights of workers

No Global Framework Agreement or other agreements related to respect of human rights of workers in place.

### Disclosure of how effectiveness of engagement with value chain workers is assessed

Canyon engages with workers in its supply chain indirectly through social audits and various mechanisms that allow workers to participate in the process. Independent auditors, acting on behalf of Canyon, conduct individual and group interviews, with a special focus on migrant workers where relevant. Workers at audited companies are invited to take part in an anonymous worker sentiment survey and are encouraged to contact the independent third-party audit firm in case of any retaliation after the audit. Based on the anonymous and aggregated information gathered from interviews and surveys, Canyon has identified the need to increase awareness of the Canyon Speak Up platform, providing workers in the value chain with an additional grievance mechanism.

### Disclosure of steps taken to gain insight into perspectives of value chain workers that may be particularly vulnerable to impacts and (or) marginalised

*See Engagement occurs with value chain workers or their legitimate representatives directly, or with credible proxies*

### Statement in case the undertaking has not adopted a general process to engage with value chain workers

N/A

## 7.4.3.5.4 Channels for value chain workers to raise concerns

### Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has identified that it connected with a material negative impact on value chain workers

Canyons Human Rights Programme clearly defines the steps required to ensure appropriate mitigation of risks, or remediation of actual impacts. The programme addresses actual and potential impacts along the value chain. For further information about the identified impacts, please refer to the actions specified in this standard and to ESRS 2.

Canyon requires time-bound corrective action plans to be developed by the suppliers, and collaborates with them to help them identify the root cause of the issues, together with the appropriate immediate corrective actions and long-term preventive actions, setting implementation timelines and allocating clear responsibilities. Canyon follows up on the implementation of the actions in meetings with the suppliers where they share evidence and details of the implementation. New social audits are conducted to formally confirm the effective implementation of the corrective actions, and ensure sustained compliance.

Remedies can take a range of forms, such as restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative). As an example, a remedy concerning child labour or the employment of young workers under hazardous conditions shall include, but is not limited to:

- Enabling the child to attend school, including the payment of fees related to schooling.
- The family receiving compensation for their financial losses due to the ending of the employment of the child, covering at least minimum wage until the child can be employed under conditions that no longer relate to the definition of child labour or jeopardise the wellbeing of a young worker. Compensation can also be given by offering the child’s job to a qualified adult member of the family.
- Offering the child an equivalent job after schooling and reaching the minimum working age.

### Disclosure of specific channels in place for value chain workers to raise concerns or needs directly with undertaking and have them addressed

The Speak Up platform facilitates access for workers in the value chain to Canyons own grievance mechanism, where all impacts can be reported anonymously. The Speak Up platform is accessible to the public under https://canyon.integrityline.app/. (For further information about the Speak Up platform, please refer to Chapter G1 Business Conduct).

### Disclosure of processes through which undertaking supports or requires availability of channels

Canyon will continue to engage with key suppliers in high-risk countries in 2025 to raise awareness of the Canyon Speak Up platform amongst workers in the value chain and thus further increase accessibility of the platform for potentially affected persons (For further information about the Speak Up platform and associated actions, please refer to Governance information: Business Conduct). Canyon also supports the establishment of factory-based grievance mechanisms at its suppliers’ production locations. Their existence is assessed through social audits. Awareness of value chain workers is assessed through worker interviews and workers sentiment surveys. Read more about the interviews and surveys in the Social information: Workers in the Value Chain, Processes to remediate negative impacts and channels for value chain workers to raise concerns. By the end of 2024, such a mechanism existed in 97% of all monitored production locations.

### Disclosure of how issues raised and addressed are tracked and monitored and how effectiveness of channels is ensured

To ensure the adequacy of the process, the effectiveness of the whistleblowing procedure described in the Speak Up Policy will be reviewed at least once every year and on an ad hoc basis if required. Canyon also encourages whistleblowers to make improvement proposals by sending in a separate report through the Speak Up platform.

### Disclosure of how it is assessed that value chain workers are aware of and trust structures or processes as way to raise their concerns or needs and have them addressed

N/A

## Policies regarding protection against retaliation for individuals that use channels to raise concerns or needs are in place

In accordance with Canyons values, legal requirements and the Speak Up Policy, any form of retaliation against whistleblowers is not allowed. The confidentiality of the whistleblower is maintained, and their identity is protected. In this context, retaliation means adverse conduct taken when an individual reports an actual or perceived violation of human rights. However, deliberate misreporting or reports only intended to cause harm will not be covered by the whistleblower protection, Canyon may then share whistleblower's name and take actions against them under the law.

## Statement in case the undertaking has not adopted a channel for raising concerns

N/A

### 7.4.3.5.5 Actions and resources in relation to value chain workers

## Disclosure of key action

Canyon has strengthened its human rights due diligence process, in line with the requirements of internationally recognized standards and legislation. This process was set up as a continuous improvement cycle which includes the prevention, mitigation and remediation of adverse human rights impacts. For 2025, Canyon will extend the human rights due diligence approach, and the related programme, throughout its value chain. As outlined in Social information: Workers in the Value Chain, Policies related to value chain workers, this covers several steps which all contribute to managing the risk of human rights violations (For further information, please refer to Social information: Workers in the Value Chain, Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities).

## Description of scope of key action

The key actions listed below address all identified material impacts related to workers in the value chain as they are embedded in the holistic human rights due diligence process. The key focus of the actions is on direct business partners. As outlined in ESRS 2, material impacts at direct business partners include actual Occupational Health and Safety impacts along the whole value chain, actual impacts related to not meeting regular working hours and overtime requirements in upstream production locations and modern slavery indicators in the upstream supply chain, such as recruitment fees (whilst no actual incident of modern slavery was identified). However, the potential deeper value chain impacts are addressed indirectly through cascading effects. These potential impacts include Occupational Health and Safety, regular working hours, and forced labour.

#### Social Audits and corrective action plans

41 high risk production locations were monitored through social audits in 2024 and existing corrective action plans (CAPA) from previous years were followed up on. For more information about social audits and the handling of CAPAs, please refer to the respective section above.

#### Awareness raising amongst suppliers

During Canyons 2024 supplier meeting, key Canyon suppliers were informed about progress made in human rights due diligence, about its importance for Canyon and its partners, and the joint efforts needed to address human rights and reduce associated negative impacts.

#### Collaboration

In September 2024, Canyon joined the Mekong Club (https://themekongclub.org/) to work closely with other companies and experts on forced labour risks, in particular preventive measures and remediation.

#### Training offer for Canyon staff

Further preventive measures to address impacts on workers in the value chain were implemented, include training for Canyon staff. The training supports individuals who work with suppliers and regularly visit production locations in building human rights competences across different functions and regions. The rollout of the high-level training started in 2023. In 2024, the human rights training was integrated in the general company training strategy and will be made available to the employees through the internal learning platform to reach a wider audience and continue to raise internal awareness on the topic beyond 2024. The training focuses on the concepts of business and human rights, the development of related frameworks and regulations, several case studies on the impact of global business activities on human rights, and how we ensure Canyon addresses respect for human rights throughout the value chain. It also focuses on what each one of the participants can do individually to help ensure human rights are respected at every level of the organisation. During these sessions we also cover the Canyon Crew Check List for supplier visits. The checklist is intended for Canyon employees who visit a supplier production location and help to identify human rights issues as well as track potential violations. The effectiveness of the 2023 trainings was evaluated through a survey leading to a consolidated course rating of 4,5 out of 5 points.

### Training offer for agents and suppliers

In 2024 there were three technical training sessions specifically prepared for the agent Canyon works with in Asia. During the training sessions, topics like the handling and management of corrective action plans, Canyons Speak Up platform and social audits requirements and procedures were addressed. Canyon started to support suppliers in 2024 with specific, online trainings provided by a third-party platform. The training was tailored according to the findings of the third-party social audits and the associated corrective action plans. The training aims to support and empower suppliers in addressing and preventing adverse human rights impacts. In 2024 20 suppliers were granted access to 314 training sessions related to Occupational Health and Safety, modern slavery and working hours. Out of the 314 sessions, 171 were completed in 2024. Additionally, 5 Canyon suppliers from Vietnam participated in an onsite training from the Mekong Club focused on understanding the importance of addressing social risks within their companies' operations and supply chains, familiarising themselves with the ILO indicators of forced labour for identification and assessment, and developing strategies and best practices for mitigating forced labour risks. Canyon will continue to offer training sessions so suppliers in 2025.

### Continuously refining internal processes and structures

Integrating human rights policies into internal processes and management systems is a core element of the human rights due diligence process and represents an ongoing effort with no defined endpoint. Canyon has refined internal processes to focus on the prevention and mitigation of actual and potential human rights violations in the value chain. To drive the effectiveness of its efforts related to human rights impacts, Canyon has derived measures from the findings of the double materiality analysis to adapt internal structures and processes. Consequently, clear responsibilities have been assigned to the ESG department to address those impacts together with the Operations Team at an operational level. Canyon also increased its capacity in the ESG department focusing on Human Rights, and hired a Junior Human Rights Manager in 2024 to support the Human Rights Manager. Oversight has been assigned to the Advisory Board, Audit Committee and the Chief Executive Officer (CEO) (For further information, please refer to Governance information: Business Conduct).

## Time horizon under which key action is to be completed

All actions outlined above are part of a continuous improvement process inherent to a human rights due diligence process and have therefore no fixed end date.

## Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

N/A

## Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

N/A

## Disclosure of the type of current and future financial and other resources allocated to the action plan

Operational expenditures (OPEX) and capital expenditures (CAPEX) are set to remain below the established financial threshold.

## Description of action planned or underway to prevent, mitigate or remediate material negative impacts on value chain workers

*See Description of scope of key action*

## Description of how effectiveness of actions or initiatives in delivering outcomes for value chain workers is tracked and assessed

The effectiveness of the outlined actions or initiatives in delivering outcomes for value chain works is tracked and assessed in general through the Human Rights Program (described in this standard) and more specifically through the monitoring of non-compliances via social audits and the implementation of corrective action plans, aiming to mitigate adverse impacts.

## Description of processes to identifying what action is needed and appropriate in response to particular actual or potential material negative impact on value chain workers

*See Description of scope of key action*

## Description of approach to taking action in relation to specific material impacts on value chain workers

*See Description of scope of key action*

## Disclosure of whether and how it is ensured that own practices do not cause or contribute to material negative impacts on value chain workers

Canyon increased its focus on taking negative human rights impacts in the value chain into consideration in its purchasing practices. In general, the awarding of contracts and orders is based on a weighted cross-functional scorecard approach which includes suppliers' ESG performance. Canyons human rights policies must be signed by suppliers, and general alignment with Canyons Human Rights Program is a precondition for entering into a business relationship with Canyon. Lastly, Canyon reserves the right to terminate business relationships with its partners and suppliers that are not willing or able to adhere to the requirements outlined in the Supply Chain Code of Conduct and the Child and Forced Labour Policy. This is particularly relevant in cases where the implementation of an action plan with measures does not remedy the situation, or where, despite leveraged and joint efforts to enable the supplier to comply, no mitigation or remediation appear possible and human rights violations persist. Ending a business relationship, however, is considered a last resort, and the main goal is to remedy actual impacts, and prevent and mitigate potential impacts (in line with the German Supply Chain Act).

## Disclosure of severe human rights issues and incidents connected to upstream and downstream value chain

The following significant human rights risks associated with specific sourcing countries and commodities were identified by an abstract risk assessment in 2024:

- Inherent risk of child and forced labour;
- Inherent risk of violation of occupational health and safety standards;
- Inherent risk of exceeding regular working hour and overtime thresholds;
- Inherent risk of negative impacts on the environment.

The analysis assessed inherent country risks related to potential human rights violations. East Asia was identified as the highest-risk region, given the significant concentration of Canyon's suppliers' factories in this area. Alongside the country risk classification, the analysis highlighted a high presence of vulnerable groups, particularly foreign migrant workers, in the region. As a result, Canyon prioritized these locations for auditing, monitoring, and remediation efforts to address and mitigate potential risks.

Severe human rights risks and related incidents outlined above were identified in the human rights risk assessment and due diligence process that defined material impacts.

## Disclosure of resources allocated to management of material impacts

Canyon has an ESG department based in Koblenz, where a Human Rights Manager and a Junior Human Rights Manager manage and continuously improve the human rights due diligence processes. They are supported by Canyons Agent Asia. This is relevant because Asia has been assessed as a high-risk region for human rights violations. The on-site team in Asia supports the remediation of negative impacts, particularly those that concern health and safety matters, directly at the production locations. Respect for human rights and related risk mitigation are supported by the whole company and across the global supply chain through the cross-functional collaboration of Human Rights experts in the ESG department. Canyon has a dedicated yearly budget for human rights topics, including the end-to-end due diligence platform it uses, the fulfilment of social audits, and the implementation of corrective actions (For further information, please refer to Governance information: Business Conduct).

# 7.4.3.5.6 Targets related to value chain workers

## Relationship with policy objectives

### Occupational Health and Safety

Occupational Health and Safety impact in production locations are allocated in the along the whole value chain at direct business partners and potentially in the deeper value chain. To address these challenges, Canyon's Supply Chain Code of Conduct explicitly requires the implementation of robust occupational health and safety measures to safeguard workers health and safety. The policy highlights Canyon's commitment to minimizing negative impacts and fostering safe working environments across its value chain. The target of mitigate Occupational Health & Safety impacts in minimum 5 active factories located in Cambodia and Vietnam is related to this commitment.

### Regular working hours and overtime requirements

Regular working hours and overtime requirements were not met in the upstream value chain at direct business partners and could potentially materialize in the deeper value chain. Canyon's Supply Chain Code of Conduct outlines established thresholds for regular working hours and overtime. The policy reflects Canyon's commitment to promoting fair labour practices throughout the value chain. Raising awareness and offering training opportunities for suppliers with findings related to regular working hours and overtime is directly connected to the Canyon Supply Chain Code of Conduct.

### Modern slavery indicators

Modern slavery indicators were identified at direct business partners, such as recruitment fees, whilst no actual incident of modern slavery was identified. Forced labour could potentially occur in the deeper value chain. Canyon's Child and Forced Labour Policy together with the Supply Chain Code of Conduct enforces a zero-tolerance approach to modern slavery practices. Raising awareness and facilitate training opportunities for 100% of suppliers where forced labour indicators have been identified is directly related to both policies.

## Measurable target

### Occupational Health and Safety

Consolidated average decrease of Occupational Health and Safety non-compliances for targeted sites

### Regular working hours and overtime

Trainings completed by suppliers in relation to suppliers invited to participate in trainings

### Modern slavery indicators

Trainings completed by suppliers in relation to suppliers invited to participate in trainings

## Nature of target

### Occupational Health and Safety

The target for Occupational Health and Safety is of a relative nature and describes the reduction of the average number of non-compliances related to Occupational Health and Safety in selected production locations. (Indicator: Consolidated average decrease for targeted sites)

### Regular working hours and overtime

The total number of training sessions conducted to address working hours and overtime compliance is established as an absolute target. (Indicator: Trainings completed in relation to suppliers invited)

### Modern Slavery Indicators

The relative target is defined as the proportion of suppliers covered by training sessions conducted to address indicators of modern slavery. (Indicator: Trainings completed in relation to suppliers invited)

## Description of scope of target

### Occupational Health and Safety

Mitigate Occupational Health & Safety impacts in minimum 5 active factories located in Cambodia and Vietnam.

### Regular working hours and overtime

Facilitate awareness raising and training opportunities for China based suppliers with findings related to regular working hours and overtime.

### Modern slavery indicators

Raise awareness and facilitate training opportunities for 100% of suppliers where forced labour indicators have been identified.

## Baseline value

### Occupational Health and Safety

Average number of non-compliances related to Occupational Health and Safety in selected production locations.

### Regular working hours and overtime

Baseline is zero.

### Modern slavery indicators

Baseline is zero.

## Baseline year

### Occupational Health and Safety

2024

### Regular working hours and overtime

January to November 2024

### Modern slavery indicators

January to November 2024

## Period to which target applies

### Occupational Health and Safety

FY 2025 (1st January – 31st December 2025)

### Regular working hours and overtime

1st November 2024 – 31st December 2025

### Modern slavery indicators

1st November 2024 – 31st December 2025

## Indication of milestones or interim targets

N/A

## Description of methodologies and significant assumptions used to define target

### Occupational Health and Safety

Cambodia and Vietnam were chosen as a region for target implementation due to the findings of social audits conducted before the end of 2023. Based on these social audits, production locations based in Cambodia had the highest average of Occupational health and Safety non-compliances (NCs) per audit, followed by production locations based in Vietnam. These two countries are also relevant from a severity perspective, with zero tolerance and critical NCs related to Occupational Health and Safety.

### Regular working hours and overtime

Based on findings in social audits, China was prioritised for the implementation of preventive measures related to regular working hours and overtime. Training opportunities to raise awareness on this topic are shared through an online platform.

### Modern Slavery Indicators

Canyon joined the Mekong Club in 2024. The target of raising awareness of Modern Slavery and forced labour among high-risk suppliers is supported by aligning and cooperating with experts from the Mekong Club. Building internal and external capacity at suppliers to identify forced labour indicators is a preventive measure.

## Target related to environmental matters is based on conclusive scientific evidence

N/A

## Disclosure of whether and how stakeholders have been involved in target setting

Canyon engaged with internal experts for target setting. Insights from regular exchanges with suppliers and Canyon representatives based in Germany and Asia, who regularly visit the production locations of our partners, supported the process. Additionally, during the development of the corrective action plans, key insights are gained which feed into the target setting process. Reports from civil society were considered during the whole due diligence process as well.

## Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data

N/A

## Description of performance against disclosed target

N/A

## Disclosure of how value chain workers, their legitimate representatives or credible proxies were engaged directly in setting targets

Canyon engaged with internal experts for target setting. Insights from regular exchanges with suppliers and Canyon representatives based in Germany and Asia, who regularly visit the production locations of our partners, supported the process. Additionally, during the development of the corrective action plans, key insights are gained which feed into the target setting process. Reports from civil society were considered during the whole due diligence process as well.

## Disclosure of how value chain workers, their legitimate representatives or credible proxies were engaged directly in tracking performance against targets

N/A

## Disclosure of how value chain workers, their legitimate representatives or credible proxies were engaged directly in identifying lessons or improvements as result of undertaking’s performance

N/A

# 7.4.3.6 Social Information: Consumers and End-Users

## 7.4.3.6.1 Material impacts, risks and opportunities and their interaction with strategy and business model

### All consumers and end-users who can be materially impacted by undertaking are included in scope of disclosure under ESRS 2

*See Description of types of consumers and end-users subject to material impacts*

### Description of types of consumers and end-users subject to material impacts

All impacts relate to all of Canyon's customers and are not specific to certain groups.

### Type of consumers and end-users subject to material impacts by own operations or through value chain

All impacts relate to all of Canyon's customers and are not specific to certain groups.

### Material negative impacts occurrence (consumers and end-users)

#### Potential loss of personal data in the event of a cyber incident

Due to the increasing risk of cyber incidents, such as data breaches or phishing attacks, customers face a higher likelihood of personal data loss. The exposure of sensitive information, including bank account or credit card details, can lead to identity theft or fraud. To protect customer data, Canyon relies on its Legal & Privacy Council and the IT-Security team and constant monitoring of potential impacts as well as legal developments.

### Description of activities that result in positive impacts and types of consumers and end-users that are positively affected or could be positively affected

#### Empowering Canyon customers

Canyon supports the ability of its customers to repair and maintain their bikes independently, and apply self service to their purchases. Canyon provides a variety of information resources on its website www.canyon.com. Customers can access detailed repair instructions via brief instructional videos and comprehensive manuals. These resources are designed to support customers to independently repair, maintain, and assemble their bikes. The goal is to empower users with the necessary knowledge and tools to maintain their bikes safely and efficiently. Additionally, bike build and maintenance information is presented in an accessible format with clear and detailed descriptions. This information is made available to customers in multiple formats via the Canyon app, the Canyon.com support pages, and YouTube. All customer-specific information pertaining to compatible spare parts, accessories, and maintenance topics is also collated in the customer account section. This allows customers to access personalised product information using their bike's unique serial number, ensuring they have all the necessary details to maintain their bikes in the most effective way.

#### Improving customer services through traceability of information

Canyon recognises the importance of traceability of information about every part of each customer's bike for improving customer service, and identified this topic as a positive material impact. Canyon invests in increasing the traceability of customer information, resulting in clearer, more efficient processes related to the customer journey. Some of the benefits include faster problem identification followed by quick issue resolution. Transparent processes also make it easier to determine who can be held accountable in the event of an issue. This may be connected to the order process to identify the cause for delays, as well as identifying who might be responsible for other issues after delivery. Efficient follow-up procedures save time and reduce potential waiting times for Canyon's customers. Any improvement in the services Canyon provides for its customers enhances customer trust, helps build long-term customer relationships, and helps anticipate customer needs.

#### Customer safety and health benefits

Canyon actively promotes cycling as a means to improve the health of its customers. Regular cycling enhances cardiovascular health, increases physical fitness, and helps prevent chronic conditions such as obesity and heart disease. By offering a wide range of high-performance road, gravel, MTB and urban bikes, Canyon makes cycling accessible for a variety of needs and fitness levels. Canyon's commitment to innovation and ergonomic design ensures that its customers can ride comfortably and safely, encouraging a consistent, active lifestyle. Numerous independent studies show that riding a bike tends to improve the health of the cyclist. Canyon advocates for cycling as a means of transportation and recreational activity through its membership of trade associations. To ensure that cyclists can ride a bike safely and benefit from the health benefits connected to cycling, Canyon has an assurance program in place as outlined below.

### Disclosure of how understanding of how consumers and end-users with particular characteristics, working in particular contexts, or undertaking particular activities may be at greater risk of harm has been developed

*See Description of types of consumers and end-users subject to material impacts"*

### Disclosure of which of material risks and opportunities arising from impacts and dependencies on consumers and end-users are impacts on specific groups

*See Description of types of consumers and end-users subject to material impacts*

## 7.4.3.6.2 Policies to manage material impacts, risks and opportunities related to consumers and end-users

### Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users

*See Description of key contents of policy*

### Description of key contents of policy

#### Market and Consumer Insights Plan 2024

The Market and Consumer Insights Plan is a central policy for managing customer satisfaction and identifying customer needs, e.g. in relation to customer service. This policy is connected to two actual and positive material topics in the downstream value chain:

- Enabling customers to be less dependent on workshops by offering qualitative information for assembly, maintenance and other topics;
- Offer a better customer service through traceability of information on each specific part on each customer's bicycle.

#### Customer safety and health benefits

Safety, reliability, and functional testing requirements are clearly defined and validated for each bike to ensure a safe riding experience for cyclists. When riders have confidence in the safety of their bicycle, they are more likely to use it regularly, which contributes to improved physical fitness and overall health. Additionally, enhanced riding comfort encourages more frequent use, while a secure and reliable bicycle further motivates cyclists to ride longer and more often. This policy is connected to the positive actual and material health impact of riding a bike.

#### Data Protection Policy

To protect its customers' personal data, Canyon has implemented a comprehensive internal data protection policy, which provides detailed, step-by-step instructions on the actions to take in the event of data loss. This policy relates to the negative material impact of violation of customers rights due to the potential loss of personal data in a cyber incident.

#### Major Incident Guideline

This guideline sets out the steps and measures to take in the event of a major cyber incident. This policy relates as well to the negative material impact of violation of customers rights due to the potential loss of personal data in a cyber incident.

### Description of scope of policy or of its exclusions

#### Market and Consumer Insights Plan 2024

The concept combines several methods of analysing customer needs, such as research or feedback processes in order to better understand customer needs as well as identify customer trends. It serves as a confidential and internal tool to steer customer satisfaction and develop the Canyon net promoter score. The plan is updated yearly.

#### Customer safety and health benefits

Canyon's target setting process for quality and safety is integrated into the annual organisational planning. Quality targets are established across the entire company to ensure alignment with regulatory requirements and industry standards. The Standards & Requirements team is responsible for ensuring that all products comply with the relevant regulations and industry norms. For each bike, the applicable global standards and requirements are identified during the product evolution process. Compliance is then verified through rigorous testing and evaluation procedures, ensuring that all safety and quality benchmarks are met before the product reaches the market.

### Data Protection Policy

According to this policy, every employee is required to contact the legal department within 72 hours to report any loss of data. Once reported, the case is promptly managed by our external Data Protection Officer. It is their responsibility to make sure that all necessary measures are taken to address any related issues and mitigate actual damages or the risk of damages. To prevent data breaches, we have implemented several key precautions. Our IT systems are monitored 24/7 in collaboration with an external SOC partner, ensuring continuous security oversight. Yearly penetration tests are conducted to identify and address vulnerabilities in our systems. Additionally, we have an Information Security Management System (ISMS) in place to manage and enhance our security processes. Our Information Security Risk Management framework is designed to identify, assess, treat, monitor, and report risks. The policy was last updated in 2023. The policy was last updated in 2023, and the next update is planned for 2025. Future updates will be made as needed to address important or relevant matters requiring adjustments.

### Major Incident Guideline

The policy focuses on technical and organizational measures. The policy is updated annually and whenever important or relevant matters arise that require adjustments.

## Description of most senior level in organisation that is accountable for implementation of policy

### Market and Consumer Insights Plan 2024

The Market and Consumer Insights Plan is managed by the Head of Market & Consumer Insights and overseen and monitored by the VP Customer Journey & Strategy.

### Customer safety and health benefits

The Chief Operations Officer (COO) is responsible for the implementation and compliance with policies related to customer safety and health benefits within the organization.

### Data Protection Policy

The implementation of the Data Protection Policy is overseen by the Global Director Legal, who is responsible for ensuring its effective execution within the organization.

### Major Incident Guideline

The Chief Financial Officer (CFO) holds the responsibility for overseeing the implementation of the Major Incident Guideline within the organization.

## Disclosure of third-party standards or initiatives that are respected through implementation of policy

N/A

## Description of consideration given to interests of key stakeholders in setting policy

N/A

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

N/A

## Description of relevant human rights policy commitments relevant to consumers and/or end-users

There are no customer policies in place that include human rights policy commitments in relation to customers, or which address measures to provide or enable remedies for human rights impacts in relation to customers. Canyon's IRO assessment did not identify any human rights issues that could directly impact customers, apart from ensuring that bikes provided are fit for purpose through quality processes that meet or exceed legal requirements. Additionally, no other human rights topics were deemed material during the assessment.

### Disclosure of general approach in relation to respect for human rights of consumers and end-users

*See Description of relevant human rights policy commitments relevant to consumers and/or end-users*

### Disclosure of general approach in relation to engagement with consumers and/or end-users

*See Description of relevant human rights policy commitments relevant to consumers and/or end-users*

### Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts

*See Description of relevant human rights policy commitments relevant to consumers and/or end-users*

### Description of whether and how policies are aligned with relevant internationally recognised instruments

The above-mentioned policies are not fully aligned with internationally recognised instruments specifically relevant to consumers and/or end-users, including United Nations Guiding Principles on Business and Human Rights. However, the Canyon Code of Ethics, which is applicable at a global level, outlines key human rights principles that all Canyon staff must adhere to, with the aim of protecting customers via Canyon's aligned standards.

In 2024, no cases of non-respect for human rights involving consumers have been reported in Canyon's downstream value chain.

### Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve consumers and/or end-users

*See Description of whether and how policies are aligned with relevant internationally recognised instruments*

## 7.4.3.6.3 Processes for engaging with consumers and end-users about impacts

### Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts

#### Empowering Canyon Customers and Improving Customer Service

Canyon provides its customers with tools and general processes in order to enable and assist them in the assembly and maintenance of their bikes. There are also processes to help improve customer service. This activity is connected to the following impacts: Enabling customers to be less dependent on workshops by offering qualitative information and offering a better customer service through traceability of information on each specific part on each customer's bicycle. Both positive impacts were assessed to be material in the downstream value chain.

#### Potential loss of personal data

When using the Canyon website, all customers are routinely asked for permission to share personal data via a cookie banner. Customers have the option to decline sharing their personal data, in which case their information is not tracked, according to GDPR regulations. Those who consent to tracking are asked to re-confirm their consent whenever they clear their browser history or after a prolonged period between site visits. This activity relates to the prevention of violation of customers rights due to the potential loss of personal data in a cyber incident, which was identified as a material impact in the downstream value chain.

#### Customer safety and health benefits

Canyon engages directly with customers during the purchasing process and events to promote cycling. At events, Canyon provides test bikes where potential or actual customers can share feedback. Canyon also gathers feedback from journalists during press camps. Canyon's own employees are engaged through different offers like Stadtradeln and Canyon group rides. This activity relates to the positive actual impact of riding a bike, which improves the health of the cyclist. The material impact is allocated in the downstream value chain.

## Engagement occurs with consumers and end-users or their legitimate representatives directly, or with credible proxies

### Empowering Canyon Customers and Improving Customer Service

*See Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement*

### Potential loss of personal data

*See Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts*

### Customer safety and health benefits

*See Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts*

## Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement

### Empowering Canyon Customers and Improving Customer Service

#### Quick Start Guide

Every Canyon bike comes with a Quick Start Guide with instructions for the initial set-up. These instructions describe the essential steps required to assemble the bike, thus enabling a quick and uncomplicated set-up. The Quick Start Guide is supplied with every bike as a hard-copy, and can also be accessed digitally using the supplied QR code.

#### Unboxing and Service Videos

Canyon provides unboxing and service videos on its website and YouTube channel. These videos guide users through the unboxing process and demonstrate essential maintenance tasks, offering a visual reference for those who prefer learning via video content.

#### User Manual

The user manual is supplied with every e-bike purchased and is available online for all other bikes as well as e-bikes. It contains detailed information on various aspects of the bike, including assembly instructions and maintenance advice. It covers both routine checks and more technical procedures, and serves as a comprehensive reference guide for Canyon owners.

#### Canyon App

The Canyon App offers step-by-step instructions for assembly and maintenance. It also provides reminders for scheduled maintenance tasks and includes access to a library of tutorials. The app serves as a resource for customers to access the relevant information they need for the upkeep of their bikes.

#### Exploded Drawings

Exploded drawings provide detailed diagrams that illustrate the arrangement and assembly of bike components. These drawings help to identify and understand how individual parts fit together, which is useful for diagnosing issues and guiding repairs. They serve as a reference for both customers and service agents to accurately address component-related problems.

#### Spare Parts Finder

The Spare Parts Finder is a tool designed to help customers locate and order specific replacement parts for their bikes. By entering the serial number and relevant specifications, customers can identify the exact parts they need, minimizing errors in parts selection. This tool streamlines the process of obtaining the correct components for repairs and maintenance.

#### Bike Garage

The Bike Garage feature allows customers to manage information about their bike's components and maintenance history. It provides a centralised system for recording details such as part specifications, purchase dates, and service records. This feature helps both customers and service agents access relevant information efficiently, supporting better informed maintenance and support decisions.

### Customer Service and Service Agents

Canyon's customer service team is available to assist with any questions or issues. Customers can contact service agents via phone, email, or live chat. These agents are trained to provide support, including guidance on the assembly process and troubleshooting bike-related issues.

### Canyon Factory Service

Canyon Factory Service (CFS) locations offer customers professional assembly and maintenance services. Customers can bring their bikes to these certified service centers for expert care and maintenance. Currently, Canyon operates CFS locations in several key regions, including Eindhoven (Netherlands), Tres Cantos near Madrid (Spain), Carlsbad (California, USA), and Rotselaar (Belgium). Through its expanding network of Canyon Factory Service locations, Canyon offers customers convenient local service options, ensuring high-quality support wherever they are. In addition to these dedicated centers, over 300 affiliated workshops worldwide further extend Canyon's service network, delivering expert maintenance and repairs at the local level.

### Potential loss of personal data

*See Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts*

### Customer safety and health benefits

*See Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts*

## Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens and that results inform undertakings approach

### Empowering Canyon Customers and Improving Customer Service

The Vice President Customer Journey & Strategy is responsible for the process of engaging with Canyon's customers.

### Potential loss of personal data

The Chief Financial Officer (CFO) is responsible for overseeing and safeguarding personal data through robust processes and controls, ensuring compliance with data protection regulations and minimizing risks associated with data breaches.

### Customer safety and health benefits

The Chief Operations Officer (COO) has the overarching responsibility for the implementation of measures that ensure customer safety and promote health-related benefits, aligning Canyon's products and services with the highest standards of user well-being.

## Disclosure of how effectiveness of engagement with consumers and end-users is assessed

### Empowering Canyon Customers and Improving Customer Service

*See Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement*

### Potential loss of personal data

*See Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts*

### Customer safety and health benefits

*See Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts*

## 7.4.3.6.4 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

### Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has identified that it connected with a material negative impact on consumers and end-users

#### Privacy

The violation of customers rights due to the potential loss of personal data in a cyber incident was identified as negative material impact in the downstream value chain. The following approach was implemented as a remediation measure. Personal data protection and privacy are subject to the General Data Protection Regulation (GDPR), which Canyon complies with. In particular, Canyon ensures compliance with Article 28 of the GDPR by entering into data processing agreements with every contractual partner. To further reinforce data protection measures, Canyon mandates that all employees complete annual data protection training to raise awareness and understanding of this critical topic. Additionally, Canyon has established a comprehensive data protection guideline that outlines the necessary steps employees must take in the event of a data protection incident, ensuring a swift and effective response to any potential breaches. In the event of a major incident, processes to remediate the loss of data or a breach of data privacy are included in the Canyon data protection guideline. The Canyon data protection guideline contains instructions on what employees must do in the event of a data breach.

### Disclosure of specific channels in place for consumers and end-users to raise concerns or needs directly with undertaking and have them addressed

Any concerns may be reported via the Speak Up platform (For further information, please refer to Governance information: Business Conduct). For data protection inquiries, customers are directed to the specific email address provided in Canyon's data protection statement. This email address (privacy@canyon.com) is prominently displayed on the Canyon website, ensuring customers are aware of how to address their data protection concerns.

### Disclosure of processes through which undertaking supports or requires availability of channels

*See Disclosure of specific channels in place for consumers and end-users to raise concerns or needs directly with undertaking and have them addressed*

### Disclosure of how issues raised and addressed are tracked and monitored and how effectiveness of channels is ensured

*See Disclosure of specific channels in place for consumers and end-users to raise concerns or needs directly with undertaking and have them addressed*

### Disclosure of how it is assessed that consumers and end-users are aware of and trust structures or processes as way to raise their concerns or needs and have them addressed

At present, Canyon does not assess the effectiveness of mechanisms that ensure consumers and end-users are aware of and trust the processes in place to raise their concerns or needs (E.g. Speak Up platform).

### Policies regarding protection against retaliation for individuals that use channels to raise concerns or needs are in place

*See Disclosure of specific channels in place for consumers and end-users to raise concerns or needs directly with undertaking and have them addressed*

## 7.4.3.6.5 Action plans and resources to manage its material impacts, risks, and opportunities related to consumers and end-users

### Disclosure of key action

Below key actions relate to the respective material impacts disclosed in this standard in the section about processes for engaging with consumers and end-users about impacts.

#### Increased customer safety and health benefits

To secure a safe riding experience for cyclists, Canyon bikes comply with all relevant standards, including ASTM, CPSC, ISO 4210, DIN EN 14766, DIN EN 14781, and DIN EN 15194, which cover a wide range of safety and performance requirements. For example, the ASTM and CPSC standards are focused on ensuring product safety in the United States, while ISO 4210 sets international safety criteria for bicycles. DIN EN 14766 and DIN EN 14781 are specific to mountain bikes and racing bikes respectively, outlining rigorous requirements for strength, durability, and overall performance. DIN EN 15194 provides standards for electrically assisted bicycles, ensuring their safety and reliability.

In the development of new projects, Canyon Engineered Parts (CEP) undergo rigorous testing as formalised in the Canyon Testing Conditions (CTC), which not only meet but often exceed these established standards. This ensures that Canyon's products are not only compliant, but also excel in safety, durability, and performance.

During mass production, Canyon has established regular in-process inspections and end-of-line (EOL) checks both at its suppliers' facilities and within its own bike assembly processes. These quality control measures are designed to detect and address any deviations from Canyon's high standards as early as possible. Canyon also conducts ongoing requalification tests throughout the product lifecycle, ensuring that its products maintain consistent stability and safety during mass production.

This approach facilitates a safe riding experience for Canyon customers and thus supports the healthy lifestyle of cyclists as outlined above.

#### Potential loss of personal data in the event of a cyber incident

The scope of the Incident Response action is to enhance the organization's ability to detect, monitor, and respond to cyber incidents through 24/7 SOC coverage, refined response processes, and external assessments. The Application Security action focuses on identifying and addressing vulnerabilities in digital assets through penetration testing and secure coding training for software developers.

#### Continuously advancing customer service

Canyon systematically monitors the functionality and effectiveness of its Spare Parts Finder to enhance customer service and ensure access to necessary spare parts. Specifically, the company evaluates the proportion of queries for bicycles manufactured after 2015 that result in successful matches. This initiative is aimed at improving customer satisfaction by facilitating efficient access to spare parts, thereby supporting product longevity and usability. Canyon has set a target of achieving a 90% success rate for these queries, reflecting its commitment to measurable improvement and customer-oriented service.

### Description of scope of key action

#### Increased customer safety and health benefits

Failure Mode and Effect Analysis: In 2023 and 2024, Canyon improved the structured approach used to assess potential risks in products, known as Failure Mode and Effect Analysis (FMEA). This method, which is widely used in industries such as aerospace and automotive, systematically identifies potential failure modes within a product and evaluates their impact, severity, and likelihood of occurrence. For example, in the context of bike development, FMEA helps to anticipate potential issues like component fatigue, material weaknesses, or design flaws that could lead to product failure. By identifying these risks early in the development process, proactive steps can be taken to mitigate them, thus ensuring that Canyon bikes meet the highest safety and performance standards.

Field Testing Process: In 2024 Canyon also improved the systematic field-testing process, which enables Canyon to collect statistically relevant data and gain valuable insights about new bike models before they enter production. This process involves real-world testing under various conditions to assess durability, performance, and user experience.

Through targeted initiatives, such as the "#MyCanyon" campaign, Canyon engages directly with the cycling community and motivates customers to share their cycling experiences, inspiring others to incorporate riding into their daily routines. Furthermore, Canyon supports its customers by integrating its products with leading indoor cycling and training platforms, enabling them to maintain their fitness when outdoor cycling is not possible. By offering virtual training environments and digital tools, Canyon helps its customers stay active year-round, enhancing the long-term health benefits of cycling and promoting a healthier lifestyle through consistent physical activity.

#### Potential loss of personal data in the event of a cyber incident

Incident Response: By June 2024, the Security Operations Centre (SOC) extended its logging and monitoring capabilities to 24/7 coverage. This included renewing and enhancing the incident response processes and actions to ensure full operational efficiency. Additionally, three external security assessments were completed by the end of 2024, covering the evaluation of incident detection and response capabilities, and providing actionable insights for ongoing improvements.

Application Security: By August 31, 2024, a penetration test for the Canyon web shop (canyon.com) was conducted, identifying vulnerabilities and leading to the implementation of at least seven security improvements. In parallel, a secure coding training program was completed for all software developers from various departments, achieving a 100% participation rate by the end of 2024. The training focused on enhancing secure coding practices, with all participants obtaining secure coding certification.

### Continuously advancing customer service

Canyon systematically monitors the functionality and effectiveness of its Spare Parts Finder to enhance customer service and ensure access to necessary spare parts. Specifically, the company evaluates the proportion of queries for bicycles manufactured after 2015 that result in successful matches. This initiative is aimed at improving customer satisfaction by facilitating efficient access to spare parts, thereby supporting product longevity and usability. This initiative is an ongoing effort aimed at improving customer satisfaction by facilitating efficient access to spare parts, thereby supporting product longevity and usability. Since no specific timeframe has been set for completion, this process continues on a continuous basis. Canyon has set a target of achieving a 90% success rate for these queries, reflecting its commitment to measurable improvement and customer-oriented service.

## Time horizon under which key action is to be completed

### Increased customer safety and health benefits

*See Description of scope of key action*

### Potential loss of personal data in the event of a cyber incident

*See Description of scope of key action*

### Continuously advancing customer service

*See Description of scope of key action*

## Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

N/A

## Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

N/A

## Disclosure of the type of current and future financial and other resources allocated to the action plan

Operational expenditures (OPEX) and capital expenditures (CAPEX) are set to remain below the established financial threshold.

## Description of action planned or underway to prevent, mitigate or remediate material negative impacts on consumers and end-users

*See Disclosure of key action*
*See Description of scope of key action*

## Description of action to provide or enable remedy in relation to an actual material impact

*See Disclosure of key action*
*See Description of scope of key action*

## Description of additional initiatives or processes with primary purpose of delivering positive impacts for consumers and end-users

*See Disclosure of key action*
*See Description of scope of key action*

## Description of how effectiveness of actions or initiatives in delivering outcomes for consumers and end-users is tracked and assessed

The effectiveness of actions and initiatives for consumers and end-users is tracked through compliance with safety standards, rigorous testing processes (E.g., Canyon Testing Conditions, Failure Mode and Effect Analysis, and systematic field testing), and ongoing quality inspections during production. Cybersecurity measures, such as 24/7 monitoring, penetration testing, and secure coding training, are also assessed through external audits and continuous process improvements.

## Description of approach to identifying what action is needed and appropriate in response to particular actual or potential material negative impact on consumers and end-users

Canyon identifies appropriate actions to address the potential loss of personal data in the event of a cyber incident (For further information, please refer to General information, Material impacts, risks and opportunities and their interaction with strategy and business model) through 24/7 monitoring by the Security Operations Centre (SOC), yearly external security assessments, and penetration testing to detect vulnerabilities. Additionally, secure coding training for software developers ensures continuous improvement in application security. These measures enable Canyon to systematically evaluate and respond to this material negative impact.

## Description of approach to taking action in relation to specific material impacts on consumers and end-users

Canyon addresses specific material impacts on consumers and end-users (For further information, please refer to General information, Material impacts, risks and opportunities and their interaction with strategy and business model) by implementing comprehensive safety and quality measures, including adherence to international standards (e.g., ASTM, ISO 4210) and rigorous testing protocols such as Canyon Testing Conditions (CTC) and Failure Mode and Effect Analysis (FMEA). During production, regular in-process inspections and end-of-line checks ensure product integrity. Additionally, Canyon engages with customers through initiatives like the '#MyCanyon' campaign and provides digital tools for enhanced user experience. To safeguard consumer data, the company has established 24/7 cybersecurity monitoring, conducted penetration testing, and implemented secure coding practices.

## Description of approach to ensuring that processes to provide or enable remedy in event of material negative impacts on consumers and end-users are available and effective in their implementation and outcomes

In 2024, measures were implemented to ensure effective processes for addressing material negative impacts on consumers and end-users (For further information, please refer to General information, Material impacts, risks and opportunities and their interaction with strategy and business model). These included enhancing incident response processes through 24/7 monitoring by the Security Operations Centre (SOC), conducting external security assessments, and performing a penetration test of the web shop. Identified vulnerabilities were addressed with security improvements, and secure coding practices were strengthened through a training program with full participation and certification of all software developers.

## Disclosure of how it is ensured that own practices do not cause or contribute to material negative impacts on consumers and end-users

In the development of new projects, Canyon Engineered Parts (CEP) undergo rigorous testing as formalised in the Canyon Testing Conditions (CTC), which not only meet but often exceed these established standards. This ensures that Canyon's products are not only compliant, but also excel in safety, durability, and performance. During mass production, Canyon has established regular in-process inspections and end-of-line (EOL) checks both at its suppliers' facilities and within its own bike assembly processes. These quality control measures are designed to detect and address any deviations from Canyon's high standards as early as possible. Canyon also conducts ongoing requalification tests throughout the product lifecycle, ensuring that its products maintain consistent stability and safety during mass production. This approach facilitates a safe riding experience for Canyon customers and thus supports the healthy lifestyle of cyclists as outlined above.

## Disclosure of severe human rights issues and incidents connected to consumers and/or end-users

In 2024, no cases of non-respect for human rights involving consumers have been reported in Canyon's downstream value chain.

## Disclosure of resources allocated to management of material impacts

### Potential loss of personal data in the event of a cyber incident

Canyon has dedicated teams and processes in place to manage the risk of personal data loss from cyber incidents. The Legal & Privacy Counsel and the IT Security Team oversee the implementation of cybersecurity measures, monitor potential risks, and ensure compliance with data protection regulations. These efforts align with the requirements of the German Data Protection Act and include initiatives such as working toward certification under ISO 27001, the international standard for information security management systems.

#### Empowering Canyon Customers and Improving Customer Service

The Chief Operations Officer (COO), in collaboration with the Chief Digital Officer (CDO), holds overall responsibility for managing resources related to customer empowerment and improving customer services. This includes a wide range of teams, such as the Customer Service department, UX/UI Design, and the Connected department. Canyon allocates dedicated teams to enhance customer information traceability and develop customer-facing resources. These teams focus on improving processes throughout the customer journey, including the Canyon app, website, and instructional videos, which are produced in-house at the Canyon studio to ensure high-quality production standards. Efforts to improve traceability enable faster identification of issues, quicker resolutions, and enhanced accountability, especially in the event of delays or issues after delivery. Additionally, personalized product information—such as spare parts and maintenance instructions—can be accessed through customer accounts, linked to each bike's unique serial number.

#### Customer safety and health benefits

The management of resources related to customer safety and health benefits at Canyon Bicycles is driven by a cross-functional approach, with multiple departments working collaboratively to address these aspects. Teams from Customer Service, Marketing, Product Development, and Brand Management, among others, are involved in ensuring that Canyon's products meet the highest standards of safety and health benefits for customers. Canyon allocates resources to engage with customers throughout their purchasing journey, particularly during events where test bikes are made available for direct feedback. Insights are also gathered from journalists at press camps, which help Canyon refine its offerings based on both customer and industry feedback. These initiatives aim to enhance the safety and health benefits of cycling, ensuring that Canyon bicycles are designed to provide a safe and healthy experience for riders. Through the continuous collection of feedback and the development of educational resources, such as instructional videos and user manuals, Canyon works to improve the cycling experience. These efforts are part of Canyon's commitment to providing bikes that contribute to a safer, healthier lifestyle for all cyclists.

## 7.4.3.6.6 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

### Disclosure of how consumers and end-users were engaged directly in setting targets

Canyon continuously monitors the satisfaction levels of customers who have recently purchased and received a Canyon bike using the Net Promoter Score (NPS).

Three weeks after bike delivery, customers worldwide are invited via email to evaluate their complete experience by answering the question: "How likely are you to recommend Canyon bicycles to a friend or colleague?" Responses are collected on a scale from 0 to 10. Customers rating 9-10 are categorised as "Promoters," those rating 7-8 as "Passives," and those rating 0-6 as "Detractors."

Passives and Detractors are invited to participate in a targeted survey designed to pinpoint the underlying reasons for their (partial) dissatisfaction. This survey allows them to address issues across the entire customer journey, including finding the right bike, payment options, delivery, self-assembly, product quality, and customer service.

Canyon uses this feedback to further enhance bikes and services.

### Disclosure of how consumers and end-users were engaged directly in tracking performance against targets

Canyon engages consumers and end-users in tracking performance against targets through direct feedback mechanisms. For instance, customer satisfaction is monitored using the Net Promoter Score (NPS), which provides insights into consumer experience and guides improvements. Additionally, the usage data from the Spare Parts Finder is tracked to evaluate the effectiveness of customer service for bikes built after 2015, aiming for a 90% return rate. These direct engagements allow Canyon to assess progress toward targets and make adjustments based on consumer input.

## 7.4.3.6.7 Target 1

### Relationship with policy objectives

The internal Data Protection Policy for Canyon employees is a formalised framework for mitigating the risk of data loss through risk management and an increased application security.

#### Application Security

Security awareness is key element of application security and prioritized by providing yearly training to all employees, with a specific focus on software developers. Increased awareness about potential cyber security threats contributes to protecting customer rights related to the potential loss of personal data in a cyber incident. A relative target, measured as participation rate in offered trainings of Canyon employees at global level in offered training, was set for 2025: The training outlined above will be offered again twice in 2025 with changing contents, and a 100% participation rate in 2025 shall be reached. Data protection is a key topic for Canyon to guarantee a safe environment for customers, which is reflected in the 100% participation rate.

### Measurable target

*See Relationship with policy objectives*

### Nature of target

*See Relationship with policy objectives*

### Description of scope of target

*See Relationship with policy objectives*

### Baseline value

0

### Baseline year

2024

### Period to which target applies

*See Relationship with policy objectives*

### Description of methodologies and significant assumptions used to define target

*See Relationship with policy objectives*

### Disclosure of whether and how stakeholders have been involved in target setting

Targets were set by involving experts from IT-Security and the Consumer Insights Team.

## 7.4.3.6.8 Target 2

### Relationship with policy objectives

#### ISO 27001 Certification Preparation

The Information Security Risk Management framework is designed to identify, assess, treat, monitor, and report risks. The implementation of an information security management system shall contribute to the protection of customer rights related to the potential loss of personal data in a cyber incident. A relative target measured as total number of relevant policies aligned with ISO 27001 Certification in relation to relevant policies that are not aligned at global company level was set accordingly. By the end of 2025, Canyon will review and update all security policies and processes to align with ISO 27001 certification standards. New processes and documentation will be developed in accordance with these standards to ensure compliance. This work will serve as preparation for achieving full ISO 27001 certification for Canyon's Information Security Management System (ISMS) by the end of 2026. The target was set as an initial key step to prepare for ISO 27001 certification.

### Measurable target

*See Relationship with policy objectives*

### Nature of target

*See Relationship with policy objectives*

### Description of scope of target

*See Relationship with policy objectives*

### Baseline value

0

### Baseline year

2024

### Period to which target applies

*See Relationship with policy objectives*

### Description of methodologies and significant assumptions used to define target

*See Relationship with policy objectives*

### Disclosure of whether and how stakeholders have been involved in target setting

Targets were set by involving experts from IT-Security and the Consumer Insights Team.

## 7.4.3.6.9 Target 3

### Relationship with policy objectives

The Market and Consumer Insights Plan is a central policy for managing customer satisfaction and identifying customer needs, e.g. in relation to customer service. It serves as a confidential and internal tool to steer customer satisfaction and develop the Canyon net promoter score

#### Net Promoter Score (NPS)

The Net Promoter Score (NPS) serves as a tool to track and assess customer satisfaction, reflecting the positive impact of improvements. By providing customers with qualitative information for assembly, maintenance, and other topics, they become less dependent on workshops. Additionally, enhanced traceability of information for each specific part on their bicycle enables better customer service. These improvements contribute to a better overall customer experience, which is measured through the NPS. Key areas of customer satisfaction that are assessed through the NPS are product quality, self-assembly, delivery, customer service, product information, search and payment options. Canyon targets a 70 NPS. As customer satisfaction is a core element of Canyons overall business strategy, the target was set to reflect the ambition level of Canyon for customer satisfaction. The timeframe for this target is not specified yet. More detailed information can be found in the chapter on NPS.

### Measurable target

*See Relationship with policy objectives*

### Nature of target

*See Relationship with policy objectives*

### Description of scope of target

*See Relationship with policy objectives*

### Baseline value

55

### Baseline year

2023

### Period to which target applies

*See Relationship with policy objectives*

### Description of methodologies and significant assumptions used to define target

*See Relationship with policy objectives*

### Disclosure of whether and how stakeholders have been involved in target setting

Targets were set by involving experts from IT-Security and the Consumer Insights Team.

## 7.4.3.7 Governance Information: Business Conduct

### 7.4.3.7.1 Ethical conduct oversight

### Disclosure of role of administrative, management and supervisory bodies related to business conduct

Canyon´s governing body is composed of an Advisory Board, an Audit Committee and the Board of Directors. The Chief Executive Officer (CEO) and the Chief Financial Officer (CFO) form the Board of Directors and are responsible for the overall and strategic management of Canyon. Further details regarding the roles and responsibilities of the governing body are set out in the section General information, ESRS 2, which also provides information about the strategy of Canyon (Strategy, business model and value chain) and the management of impacts, risks and opportunities (Material impacts, risks and opportunities and their interaction with strategy and business model).

### Disclosure of expertise of administrative, management and supervisory bodies on business conduct matters

All members of Canyon’s governing body have an international track record in leadership and management. Their diverse expertise at a global level relates to different industries, which reflect the spectrum of Canyon’s operations and offering of products and services (For further information, please refer to General information, The role of the administrative, management and supervisory bodies).

### 7.4.3.7.2 Business conduct policies and corporate culture

### Description of the mechanisms for identifying, reporting and investigating concerns about unlawful behaviour or behaviour in contradiction of its code of conduct or similar internal rules

Canyon has adopted a set of codes and policies to ensure that employees and interest groups are aware of the company values as well as of legal requirements relevant to Canyon. Everyone who works with and for Canyon worldwide is required to comply with these fundamental principles, to familiarise themselves with Canyon’s policies, adhere to mandatory guidelines and regulations in all cases, and speak up in the event of any potential or actual violations of our values and principles. In connection with the protection of whistleblowers, two Canyon policies are essential and aligned: the Environmental, Social and Governance Policy and the Speak Up Policy. Both policies are communicated across Canyon worldwide, and they are publicly accessible via the Canyon website at Canyon Codes and Policies (https://www.canyon.com/en-de/about-content/compliance/codes-and-policies/).

#### Environmental, Social, and Governance Policy

In the Environmental, Social and Governance Policy, Canyon expresses its commitment to corporate sustainability and ethical business practices. The objective of the policy is to connect both, and formalise how Canyon integrates its ESG policies and codes through structured governance in its core business strategy and key processes. In addition, based on this policy, Canyon encourages its own employees, business partners, or any potentially affected persons to report non-compliance with Canyon’s policies.

#### Speak Up Policy

The Speak Up Policy provides details on how to make a report, the available reporting channels, the responsibilities, and the handling procedures. Canyon employees and external interest groups can report any actual or suspected cases of violations that are connected to Canyon activities via the web-based Speak Up platform while being granted full anonymity. Violations may include, for example, human rights or environmental law violations, criminal or administrative offences, violations of the Canyon Code of Ethics (read more about the Canyon Code of Ethics in Social information: Own workforce, S1), violations of product safety or consumer protection laws, or breaches of competition or antitrust laws, including anti-corruption as outlined in the Canyon Code of Conduct (Chapter 5.5 “Fighting corruption”) etc.

The responsibility for the implementation and enforcement of these policies is headed by the Global Director ESG, while the Chief Executive Officer (CEO) is responsible for monitoring the status of implementation and enforcement of the policies together with the Global Director ESG. The approval and review of policies in general has been assigned to the Advisory Board.

### Timetable for implementation of policies on protection of whistleblowers

The implementation of policies regarding the protection of whistleblowers has been completed. This includes the Speak Up Policy and the Environmental, Social, and Governance Policy, which together provide a comprehensive framework to ensure that individuals can raise concerns confidentially and without fear of retaliation.

## 7.4.3.7.3 Reporting on breaches to the code of conduct

### Undertaking is committed to investigate business conduct incidents promptly, independently and objectively

#### Investigation, remedy, and effectiveness

Any report is to be handled by the ombudsperson in a timely manner within a defined, time-bound process. Canyon's ombudsperson will determine the responsible case manager and direct the report to the relevant Canyon Whistleblowing Officers. The assigned Whistleblowing Officer will conduct the investigation and establish the material facts in line with the applicable laws and regulations. This process may include documentation review, interviews, and data analysis. The duration of this investigation process will depend on each individual case and the whistleblower will be updated regularly on its status. Based on the conclusions of the investigation, if it is found that misconduct has occurred, actions will be proposed, and appropriate remedial measures implemented. Once the case is closed, final feedback is provided to the whistleblower. To assess the effectiveness of the processes, the procedure is reviewed at least once every year, and additionally on an ad hoc basis, if required. We also encourage whistleblowers to make improvement proposals via the Speak Up platform.

### Information about policy for training within organisation on business conduct

Information about the Speak Up platform is currently part of the Welcome Day for new employees in Germany. The plan to expand this introduction to the Welcome Days globally across all markets is scheduled for Q1 2025. Additionally, the grievance mechanism is part of the Canyon internal human rights training program, which also covers the Speak Up platform to raise awareness. (For further information, please refer to Social information: Workers in the Value Chain, 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). As outlined below under actions, awareness raising for the Speak Up platform took place amongst Canyon's own workforce. New training for the Whistleblowing Officers and the ombudsperson is planned for 2025.

### Disclosure of safeguards for reporting irregularities including whistleblowing protection

#### Mechanisms for the protection of Whistleblowers

Canyon has appointed an external, neutral and independent lawyer (ombudsperson) to advise on and manage any reported incidents, ensuring that all of them are addressed by the relevant Canyon Whistleblowing Officers. There are five Whistleblowing Officers at Canyon: the Global Legal Director, the Global ESG Director, the Vice President People, the Senior Director People, and the Human Rights Manager. All Whistleblowing Officers are entitled and required to operate independently; they are not subject to any instructions from management in this function, and they ensure that case management aligns seamlessly with compliance needs. They also ensure confidentiality at all times. This is supported by the fact that all identity-related information is not processed on Canyon's IT-infrastructure but exclusively on servers belonging to the provider of the Speak Up platform. Only the Whistleblowing Officers, the ombudsperson and the employees of the platform provider have access to the whistleblowing data on the servers of the platform provider, with whom a data processing agreement pursuant to the General Data Protection Regulation has been concluded. Confidentiality is also ensured through secure electronic file management. These mechanisms ensure non-retaliation against whistleblowers in accordance with the applicable law transposing Directive (EU) 2019/1937.

For internal reports, Canyon's own employees can also approach their direct managers, who may be able to address their concern or redirect it to the appropriate person. In case this is inappropriate, or the employee does not feel comfortable approaching the corresponding manager, he or she can also approach any other company representative or manager. In accordance with Canyon company values and legal requirements, no form of retaliation against whistleblowers is allowed.

### Description of key contents of policy

Canyon has adopted a set of codes and policies to ensure that employees and interest groups are aware of the company values as well as of legal requirements relevant to Canyon. Everyone who works with and for Canyon worldwide is required to comply with these fundamental principles, to familiarise themselves with Canyon's policies, adhere to mandatory guidelines and regulations in all cases, and speak up in the event of any potential or actual violations of our values and principles. In connection with the protection of whistleblowers, two Canyon policies are essential and aligned: the Environmental, Social and Governance Policy and the Speak Up Policy. Both policies are communicated across Canyon worldwide, and they are publicly accessible via the Canyon website at Canyon Codes and Policies. The monitoring of the policy is aligned with the process described in the Environmental, Social and Governance Policy. For further information, please refer to General information.

Potential whistleblowers could have a positive impact as they play a critical role in exposing wrongdoing in an organisation.

## Description of scope of policy or of its exclusions

### Environmental, Social, and Governance Policy

In the Environmental, Social and Governance Policy, Canyon expresses its commitment to corporate sustainability and ethical business practices. The objective of the policy is to connect both, and formalise how Canyon integrates its ESG policies and codes through structured governance in its core business strategy and key processes. In addition, based on this policy, Canyon encourages its own employees, business partners, or any potentially affected persons to report non-compliance with Canyon's policies. The policy is applicable for all Canyon ESG policies at global level.

### Speak Up Policy

The Speak Up Policy provides details on how to make a report, the available reporting channels, the responsibilities, and the handling procedures. Canyon employees and external interest groups can report any actual or suspected cases of violations that are connected to Canyon activities via the web-based Speak Up platform while being granted full anonymity. Violations may include, for example, human rights or environmental law violations, criminal or administrative offences, violations of the Canyon Code of Ethics (For further information, please refer to Social information: Own Workforce), violations of product safety or consumer protection laws, or breaches of competition or antitrust laws, including anti-corruption as outlined in the Canyon Code of Conduct (Chapter 5.5 "Fighting corruption") etc. The policy is applicable for all internal and external interest groups a global level.

## Description of most senior level in organisation that is accountable for implementation of policy

The responsibility for the implementation and enforcement of these policies is headed by the Global Director ESG, while the Chief Executive Officer (CEO) is responsible for monitoring the status of implementation and enforcement of the policies together with the Global Director ESG. The approval and review of policies in general has been assigned to the Advisory Board. For further information, please refer to General information.

## Description of consideration given to interests of key stakeholders in setting policy

The policies were developed by internal stakeholders (mainly Legal- and ESG department members). During the development, interests of external stakeholders were indirectly considered by this group.

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

Both policies are communicated across Canyon worldwide and are publicly accessible via the Canyon website under Canyon Codes and Policies. Additionally, these policies are readily available to employees through the internal employee portal.

### Canyon's Own Operations

One of the key challenges for the implementation of a grievance mechanism is to create trust in the process connected to the handling of any concerns raised. To increase the level of trust, the Speak Up platform was promoted by the Chief Group Development Officer (CGDO) during an all-hands meeting for employees based in Germany. The gathering was organized by the works council in January 2024. The aim was to raise awareness and increase trust of this mechanism amongst Canyon employees based in Germany. Globally, stickers with QR Codes linking to the Speak Up platform were distributed across Canyon's own operations to support and facilitate easy and confidential access to the tool.

### Value Chain Workers

For workers in the value chain, questions about governmental and factory-based grievance mechanisms are embedded in the workers' sentiment survey, which is part of selected social audits performed in high-risk production locations by a third party. Concerning Canyon's own Speak Up platform, Canyon engaged with selected suppliers to increase accessibility for workers in the value chain. The respective workforce was informed about the existence of the platform and how to report any relevant concerns using visuals.

## 7.4.3.7.4 Action

### Disclosure of key action

- In 2024, Canyon identified migrant workers as a most vulnerable group. In Q1 2025, the most vulnerable groups will be re-assessed at a global level, based on the social audit information from 2024. By re-assessing the most vulnerable groups, accessibility to the grievance mechanism can be increased through the reduction of potential accessibility barriers. (e.g. review and alignment of available languages in the grievance mechanism in line with the needs of the most vulnerable groups).
- Canyon will evaluate the level of awareness of the grievance mechanism within the company at a global level using a survey in 2025/2026, and build on the results of the assessment in 2026/ 2027.
- Canyon will continue to engage with key suppliers in high-risk countries in 2025 to raise awareness of the Canyon Speak Up platform amongst workers in the value chain and thus further increase accessibility of the platform for potentially affected persons.

All actions contribute to increased accessibility of the Peak Up Platform at global level. Potential whistleblowers could have a positive impact as they play a critical role in exposing wrongdoing in an organisation.

### Description of scope of key action

*See Disclosure of key action*

### Time horizon under which key action is to be completed

*See Disclosure of key action*

### Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

No negative material impact identified (For further information, please refer to General information, Material impacts, risks and opportunities and their interaction with strategy and business model).

### Disclosure of the type of current and future financial and other resources allocated to the action plan

Operational expenditures (OPEX) and capital expenditures (CAPEX) are set to remain below the established financial threshold.

## 7.4.4 Appendix IV - Sienna IM

### 7.4.4.1 General Information

#### 7.4.4.1.1 Reporting scope and boundaries

**Disclosure of general basis for preparation of sustainability statement**

This first step in the DMA supports the definition of the sustainability landscape specific to Sienna IM and its core business, the identification of key affected stakeholders and their relative contribution.

This step supports the investigation of potential material ESG topics to assess in a next phase the potential IROs. Aligned with the statement provided, a preliminary step consists in proceeding with an analysis of the activities of Sienna IM, its business relationships, and the context.

During this step, the following tasks are performed:

- The analysis of Sienna IM's strategy, financial statements and ESG reporting covering the previous periods;
- A review of the economic activities and their geographic locations;
- A mapping of the business relationships in upstream and/or downstream value chain, including type and nature of business relationships;
- An understanding of the affected stakeholders and their potential interests;

The analysis of the Sienna IM's relevant legal and regulatory landscape.

The identification of the list of sustainability matters, covered in topical ESRS in accordance with ESRS 1 AR.16 is used as starting point. Sienna IM also built on the double materiality analysis previously undertaken by GBL: reviewing the ESRS and related-IROs that had been scored, which emerged as material and the reasons behind their materiality.

The sustainability statement has been consolidated at Sienna group level.

**Scope of consolidation of consolidated sustainability statement is same as for financial statements**

The DMA and the related sustainability statement apply to Sienna IM at consolidated level - meaning Sienna IM and its subsidiaries. It considers all the business processes and areas in which Sienna IM operates.

The DMA was conducted by expertise (at holding levels) rather than by location or region. For all the subsidiaries, the assets and activities are predominantly located in Europe (Sienna Real Estate's activity in South Korea being only acting as a distributor).

Sienna IM confirms that the scope of its non-financial reporting overlaps with that of its financial reporting. This alignment ensures consistency and transparency in disclosures, providing a comprehensive view of the company's performance and commitments.

**Indication of subsidiary undertakings included in consolidation that are exempted from individual or consolidated sustainability reporting**

No subsidiary undertakings included in Sienna's consolidation are exempted from individual or consolidated sustainability reporting. All entities are required to comply with the sustainability reporting requirements.

Considering the perimeter of the sustainable reporting obligation given the Sienna IM's activities and core business, the definition of the scope of the DMA follows an approach based on the following items:

- Sienna IM as responsible company which includes its entities and subsidiaries and the investment management activities. In this perspective, Sienna IM is directly confronted to ESG exposure generating impacts, risks and opportunities linked to its role as an employer and contributor to the environment in which it operates. In the DMA, the associated scope for Sienna as a responsible company is "own operation".
- Sienna IM as responsible investor which includes the portfolio companies within Sienna IM's portfolio. Those companies identify and address their sustainability impacts and associated risks and opportunities within the framework of their own internal controls and governance. In the DMA, the associated scope for Sienna as a responsible investor is "invested companies".
  - Sienna IM has taken a broad view when evaluating the investee companies. Instead of getting into the granular details of each investment portfolio line, Sienna IM focuses on a higher level. Sienna IM has leverage on the SFDR reporting at product-level and plans to enrich this approach subsequently towards a more granular-level. In compliance with article 29 of the French "Loi Energie Climat" (Energy and Climate Law), Sienna Gestion and Sienna Private Credit publish a dedicated annual report ("Art.29 LEC report") detailing the Principle Adverse Impacts (PAIs) at their portfolios level.
  - Sienna IM adopted a "best-in-class" approach, which means the possibility of investing in all sectors (except those subject to exclusion policies). The best-in-class strategy involves constructing an investment universe by first identifying and excluding the bottom 20% of companies with low ESG performance. This ensures that only companies with better ESG practices are eligible for investment.

## Disclosure of extent to which sustainability statement covers upstream and downstream value chain

The definition of Sienna IM's value chain was based on a business model analysis expert judgment-based assessment. The methodological mapping assessment is conducted at a high level in order to capture the full spectrum of Sienna IM 's operations.

The value chain of Sienna IM has been crafted by delineating the firm's core activities, which include real estate activities under Sienna Real Estate, private debt activities through Sienna 2A, and listed and hybrid assets management through Sienna Gestion. These are complemented by a framework of supporting activities.

The value chain can be broken down into three segments:

- own operations (mainly investment activities)
- **upstream:** suppliers. As a financial institution, Sienna IM mainly engages with suppliers such as consultants and data providers, which have limited environmental and social impacts. For this reason due to the nature of the suppliers (non-manufactured activities) suppliers tiers 1, 2 and 3 are not considered material in Sienna IM's double materiality analysis.
- **downstream:** clients, distributors and investee companies which are considered at high level for this first year of reporting.

No silent stakeholders were integrated following the interviews conducted, as it was deemed neither pertinent nor proportional.

The end-of-life aspect of products has not been factored into the DMA, nor in the value chain, as it is deemed to have low materiality in the context of Sienna IM's management of European product scale. The end-of-life process is managed for Sienna IM's products as follows:

- **Sienna Gestion:** the end-of-life of a product typically results in either the merging of two funds or the closure of a mandate.
- **Sienna Private Credit:** when a fund reaches the end of its life (no more debt, fully repaid), it has a predetermined limited duration.

## Option to omit specific piece of information corresponding to intellectual property, know-how or results of innovation has been used

The option of omit has not been used for Sienna IM.

## Option allowed by Member State to omit disclosure of impending developments or matters in course of negotiation has been used

Sienna IM does not use the exemption provided for undertakings based in an EU member state that allows for the exemption from disclosure of impending developments or matters in the course of negotiation.

### 7.4.4.1.2 Specific circumstances related to time horizons

## Definitions of medium- or long-term time horizons

Alignment of the short, medium- and long-term time horizons defined by ESRS 1 section 6.4.

Sienna IM does not use deviations from the medium- or long-term time horizons defined by ESRS 1 section 6.4 Definition of short-, medium- and long-term for reporting purposes.

The time horizons for SBTi targets at Sienna IM are set at 5 years. These targets are consistent and not different from the standard time frames established by the SBTi.

## Reasons for applying different definitions of time horizons

Alignment of the short, medium- and long-term time horizons defined by ESRS 1 section 6.4.

Sienna IM does not use deviations from the medium- or long-term time horizons defined by ESRS 1 section 6.4 Definition of short-, medium- and long-term for reporting purposes.

The time horizons for SBTi targets at Sienna IM are set at 5 years. These targets are consistent and not different from the standard time frames established by the SBTi.

## 7.4.4.1.3 Value chain estimation

### Metrics include value chain data estimated using indirect sources

As a financial actor, Sienna IM operates in a complex environment based on external data and forward-looking metrics. To ensure the integrity and reliability of the information used in decision-making processes, Sienna IM relies on a network of external data providers - gathering and processing financial and extra-financial data from various sources. These processes and data providers are not necessarily audited. For some of the metrics including in the upstream and/or downstream value chain, data can be estimated using indirect sources such as sector-average data or proxies.

Carbon-related data is provided by Bloomberg (listed asset), Carbometrix and Sustainalytics (private assets).

**Metrics:** Scope 1, 2, and 3.

### Description of basis for preparation of metrics that include value chain data estimated using indirect sources

For private assets, the methodology for collecting Scope 1, 2, and 3 emissions involves first requesting the information directly from the companies. If the information is not provided, Carbometrix is consulted. If data is still unavailable, proxies from Sustainalytics are used. For listed assets, the data is available on Bloomberg.

### Description of resulting level of accuracy of metrics that include value chain data estimated using indirect sources

For private assets, the methodology for collecting Scope 1, 2, and 3 emissions involves first requesting the information directly from the companies. If the information is not provided, Carbometrix is consulted. If data is still unavailable, proxies from Sustainalytics are used. For listed assets, the data is available on Bloomberg.

### Description of planned actions to improve accuracy in future of metrics that include value chain data estimated using indirect sources

For listed assets, we expect the data providers to improve their data collection and data quality over time.

For private assets, dialog is ongoing with investee companies. Sienna continuously requests and supports the investee companies for improve the data collection.

## 7.4.4.1.4 Sources of estimation and outcome uncertainty

### Disclosure of quantitative metrics and monetary amounts disclosed that are subject to high level of measurement uncertainty

No metric is subject to high level of measurement uncertainty at Sienna IM.

### Disclosure of sources of measurement uncertainty

No metric is subject to high level of measurement uncertainty at Sienna IM.

### Disclosure of assumptions, approximations and judgements made in measurement

No metric is subject to high level of measurement uncertainty at Sienna IM.

## 7.4.4.1.5 Changes in preparation or presentation of sustainability information

### Explanation of changes in preparation and presentation of sustainability information and reasons for them

N/A - Sienna IM's first exercise without any prior disclosure.

### Disclosure of revised comparative figures

N/A - Sienna IM's first exercise without any prior disclosure.

### Disclosure of difference between figures disclosed in preceding period and revised comparative figures

N/A - Sienna IM's first exercise without any prior disclosure.

### Disclosure of nature of prior period material errors

N/A - Sienna IM's first exercise without any prior disclosure.

### Disclosure of corrections for prior periods included in sustainability statement

N/A - Sienna IM's first exercise without any prior disclosure.

### Disclosure of why correction of prior period errors is not practicable

N/A - Sienna IM's first exercise without any prior disclosure.

## 7.4.4.1.6 Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

### Disclosure of other legislation or generally accepted sustainability reporting standards and frameworks based on which information has been included in sustainability statement

Sienna IM is a holding company. As such, Sienna IM doesn't report on extra-financial information. Its subsidiaries, Sienna Gestion and Sienna AM France are regulated companies. Each of them publishes an Art 29 LEC report, which only includes extra-financial information at the company level.

### Disclosure of reference to paragraphs of standard or framework applied

Sienna IM is a holding company. As such, Sienna IM doesn't report on extra-financial information. Its subsidiaries, Sienna Gestion and Sienna AM France are regulated companies. Each of them publishes an Art 29 LEC report, which only includes extra-financial information at the company level. It should be noted that no legislation is partially applied at Sienna IM. All relevant laws and regulations are fully adhered to in their entirety.

## 7.4.4.1.7 Incorporation by reference

### List of DRs or DPs mandated by a Disclosure Requirement

No DP has been incorporated by reference.

## 7.4.4.1.8 Use of phase-In provisions in accordance with Appendix C of ESRS 1

### Topics (E4, S1, S2, S3, S4) have been assessed to be material

The sector-specific sustainability matter (related to financial sector) integrates, on a high-level basis, the environmental, social and governance impacts related to investee companies' activities. For this reason, and pending the publication of a dedicated sector-specific ESRS, the ESRS E2, E3, E4, S2 and S3 are not considered at a micro scale, but on a broader scale at sector specific IROs level.

Moreover, it should be noted that no phased-in provisions are used on these topics. All relevant requirements are fully implemented as specified.

## List of sustainability matters assessed to be material (phase-in)

Sienna IM does not exceed the average number of 750 employees during the financial year. However, as a multiple-expertise pan-European asset manager of the publicly traded investment holding company Groupe Bruxelles Lambert ("GBL"), Sienna IM does report in GBL consolidated sustainability report (exceeding 750 employees). Therefore, it should be noted that no phased-in provisions are used on whole topics.

## Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)

No phased-in provisions are used on whole topics for Sienna IM.

List of matters (topic/sub-topic/sub(sub-topic) in AR16 ESRS 1 Appendix A that are assessed to be material - Please refer to each specific section

### ESRS E1:

- Climate change adaptation
- Climate change mitigation

### ESRS S1:

- Social dialogue
- Freedom of association
- Employee retention
- Expertise and seniority
- Training and skills development
- Diversity
- Confidentiality

### ESRS S4:

- Access to information and transparency
- Adequacy of ESG commitments et products marketed
- Appropriateness of ESG commitments
- Access to products and services
- Responsible sales/marketing practices

### ESRS G1:

- Corporate culture
- Ethics
- LCB-FT
- Reporting on non-financial information
- Reporting on financial information
- IT (security & cyber-security)

### ESRS sector specific:

- ESG surperformance
- ESG investments
- ESG data
- Engagement, vote and advocacy

## Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets

No phased-in provisions are used on whole topics for Sienna IM.

## Description of policies related to sustainability matters assessed to be material (phase-in)

No phased-in provisions are used on whole topics for Sienna IM.

### Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions

No phased-in provisions are used on whole topics for Sienna IM.

### Disclosure of metrics related to sustainability matters assessed to be material (phase-in)

No phased-in provisions are used on whole topics for Sienna IM.

## 7.4.4.1.9 Governance structure and composition

### Information about representation of employees and other workers

No employee representative seats at the Management Committee or at the Board.

### Information about member's experience relevant to sectors, products and geographic locations of undertaking

Paul de Leusse joined Sienna in October 2022 as Group President. He began his career in 1997 in business consulting, first as a consultant and then as a partner at Oliver Wyman, before joining Bain. In 2009, he joined the Crédit Agricole Group as head of strategy, and in 2011 he became head of finance at Crédit Agricole Corporate and Investment Bank, before becoming deputy CEO. In 2016, he became Chief Executive Officer of CA Indosuez, Crédit Agricole's wealth management bank managing € 120bn of assets in 10 countries. Since 2018, he was deputy CEO of the Orange Group in charge of digital banking activities in Europe and Africa, and in this capacity CEO of Orange Bank. Paul is a graduate of Ecole Polytechnique and a Ponts et Chaussées engineer.

Xavier Collot joined Sienna Investment Managers at the start of 2022, as Managing Director of the Listed & Hybrid ASsets expertise (formerly Malakoff Humanis Gestion d'Actifs). He began his career as a Management Controller, before moving to the Crédit Agricole group. Xavier has more than 20 years' experience in asset management, and spent 15 years developing the employee savings activity. In 2016, he was appointed as a member of the Amundi Management Committee and the Group Executive Committee. Xavier has a Master's degree in Economic and Social Sciences from Université Lyon II, and has attended the INSEAD programme for Senior Managers of the Crédit Agricole Group.

Floris van Maanen manages the Real Estate expertise of Sienna IM. Floris began his real estate career with Catella Property Fund Management. After a few years on the job, he created his own investment management company together, which later merged with the company in 2016. He holds a BBA in Marketing Management from Northwood University and a MSc from Nottingham University Business School.

Thibault de Saint Priest is the Secretary General of Sienna Investment Managers. He started his career at Caisse des Dépôts et Consignations where he worked as a money market fund manager before becoming head of financial engineering. Co-founder of Acofi in 1990 and managing partner, over the last twenty years Thibault has notably built up the direct real estate investment business, the listed equity division, and the acquisition of portfolios of underperforming bank debt through securitisation vehicles. In this last activity, Thibault managed acquisition and management teams. He was also co-founder and director of Credirec, a company created by Acofi in 1993 and which has become the French market leader in the collection and acquisition of consumer loan portfolios. He is also the Chairman of the Debt Fund and Securitisation Commission created by AFG and one of the founding members of the Observatoire des Fonds de Prêts à l'Economie (OFPE). He graduated in law and economics at the University of Paris Pantheon Sorbonne and IEP Paris.

Géraud Dambrine holds a M.A in Economics & Finance from Sciences Po, Paris, and a B.A. from McGill University in Montreal. He began his career in 1998 as a Key Accounts Officer and Sales Manager at Fidelity Investments Limited (FIL), focusing on the French market. In 2002, he joined Goldman Sachs Asset Management as France's Country Head, specializing in alternative strategies. Hired by Lombard Odier Investment Managers (LOIM) in 2009 as Head of Sales for France & Europe, he subsequently covered strategic Canadian and Middle Eastern asset owners, a role he has held since 2014. In 2018, Géraud was also entrusted with LOIM's Single Family Office Coverage.

Amaury Eloy holds a Masters degree from Institut Supérieur du Commerce (ISC) and an Executive MBA from HEC Paris (2009). He has over 30 years of experience, gained as an entrepreneur in France and internationally, prior to specializing as a HRD Business Partner in asset management. In 1991 he founded and developed The Accord Group, an executive search and HR consulting firm based in Prague, Warsaw and Moscow. In 1999 he founded NewWorks, an innovative B2B web-to-print service company for the finance industry, in Paris and Geneva. He then installed the HRD function at La Financière de l'Echiquier, before joining in 2016 Sycomore Asset Management (Paris) as Head of HR & Business Partner, member of the Executive Committee.

Hervé Leclercq joined Sienna Investment Managers at the start of 2022 as Chief Compliance and Risk Officer and Head of the Luxembourg office. He began his career at PWC in 1990, joined Credit Agricole in 1993 and Amundi in 1998. He worked in London, Paris and Luxembourg. He was named Deputy CEO of Amundi UK in 2010 and of Amundi Alternative Investments in 2015. He was subsequently appointed Deputy CEO of Amundi Real Estate and Amundi Private Equity and was in charge of developing the Luxembourgish Platform since 2016. Hervé is a graduate of ISC Paris.

Banel Kane is Chief Financial Officer at Sienna Investment Managers. She started her career in 2009 at BNP Paribas in M&A advisory in the Paris, New York and Madrid offices as Analyst then Associate. She joined Natixis in 2014 and participated in the execution of large-scale M&A projects before joining Sienna Investment Managers in 2021 as Head of Corporate Development. Banel holds a Master's degree in corporate finance and financial engineering from the University of Paris Dauphine.

Sophie Chipot-Kolosvari is General Counsel of Sienna Investment Managers Group. She began her career in 1999 as attorney at law in mergers and acquisitions at Archibald Andersen and after at CMS Bureau Francis Lefebvre. In 2005, she became a M&A and governance legal counsel at Caisse des Dépôts et Consignations. She was secretary of the supervisory board of the Institution. Then she joined in 2012 the Lagardère Group where she was chargée de mission to the Group General Counsel, then deputy General Counsel of Lagardère Sports & Entertainment and finally Group M&A and financing General Counsel. Sophie graduated from the University of Paris Nanterre in French, American and English business law and from Westminster University (LLB), was admitted to the bar in 1999, obtained the certificate in corporate administration from IFA/Sciences Po Paris and followed the arbitration training of the Paris Center for mediation and arbitration.

Before joining Sienna IM as Chief Sustainable Officer, Alix Faure was Head of Responsible Development and member of the Responsible Investment Committee at Comgest for the past year. In 2019, she joined AFG (the French asset management association) as Head of Sustainable Investment. Prior to that, she served as a Senior Product Manager in charge of business development for equity and impact strategies at Mirova that she joined in 2015. Alix started her career at BNP Paribas Investment Partners in 2005, where she held a variety of roles including Investment Specialist – Sustainable & Responsible Investments. She holds a Master of Science in Management from E.M. LYON.

Sébastien Lesueur is Chief Technology and Information Officer at Sienna Investment Managers. He began his career as a consultant at Deloitte and became a CIO Advisory Practice manager. He worked for 10 years at La Banque Postale in the development of information systems of capital markets activities and for 4 years at UFF Banque Conseil en Gestion de Patrimoine where he was the director of Information Systems and member of the Executive Committee. Sébastien is a graduate of Arts et Métiers ParisTech and holds an executive master from ESSEC.

Cécile Haaser joined the Listed Assets expertise of Sienna IM (formerly Malakoff Humanis Gestion d'Actifs) in 2016 as Chief Operating Officer . She is responsible for operational matters, provides support to financial management and oversees the Data Management, Middle Office, Fund Valuation, Reporting, Legal, Finance and IT departments. Cécile began her career with Eurogroup Consulting (2002 to 2014), then worked in project management at Humanis (2014 to 2016). She graduated from Ecole Supélec in 2000.

David Taieb joined the Listed Assets expertise de Sienna IM (formerly Malakoff Humanis Gestion d'Actifs) in 2021, where he works as Chief Investment Officer. He began his career in 2003 as a Buy Side Trader at Crédit Agricole Asset Management, subsequently specialising in diversification and asset protection strategies in diversified management. In 2017, David joined Crédit Mutuel Asset Management as Director of Diversified Management and Employee Savings. He graduated from Ecole Supérieure de Gestion et Finance in Paris in 2001 and obtained an MBA in Finance and Management in 2002.

Jean-François Gonnet is Chief Risk and Compliance Officer of our Listed Assets expertise (formerly Malakoff Humanis Gestion d'Actifs). He began his career in 1995 as Director of International Affairs at the Association Française de la Gestion Financière (AFG), and later specialised in risk and compliance. Jean-François oversaw the regulatory aspects of the merger with Fongepar in 2013, which led to the creation of Humanis Gestion. He graduated from Sciences Po Paris in 1993, with an Economics and Finance degree.

Samy Bchir is Chief Investment Officer at Sienna Real Estate. Before joining the company in 2021, Samy held various positions within international groups such as Tikehau Capital, CommerzReal or Deloitte and has a cross-border exposure with a track record in the several European countries. He graduated from HEC Paris.

Jean-Marc Leverne is General Counsel & Chief Risk and Compliance Officer. He is responsible for all Legal and Risks & Compliance matters within Sienna Real Estate. Before joining the company in 2001, Jean-Marc worked as legal director at Klépierre and as legal advisor at Compagnie Bancaire (Paribas Group) in Paris, in charge of the Real Estate.

Marianne des Roseaux is Deputy Managing Director of the Private Credit branch of Sienna IM. She joined Acofi (integrated to the Sienna IM Group) in 1995, where she developed financial expertise in real estate investment operations before becoming Company Secretary then Deputy CEO at Acofi. In this role, Marianne headed up all of the company's support functions: finance, human resources, IT and general administration. Marianne holds a DESS in Banking and Finance from Université Paris I-Sorbonne.

Fabrice Rossary joined Sienna IM in May 2024 as Deputy Managing Director of Sienna IM's Private Credit expertise. His responsibilities include investments oversight, integration of liquid credit strategies, organization and cross-fertilization with the other Sienna IM entities, and the development of the Sienna credit franchise. Fabrice began his career in 1998 in the asset management industry, first as a trader and then as a fund manager specialized in high yield, convertible bonds and absolute return strategies . In 2006, he joined Fortis investment as fund manager of absolute return strategies, and in 2008 he became head of the corporate credit desk. In 2009, he joined the SCOR Group and participate to the launch of the asset management company SCOR Investment Partners, where he started as head of credit. In 2011, he was promoted as Chief Investment Officer and in 2021 as Chief Executive Officer of SCOR Investment Partners. Fabrice is a graduate from Paris II Pantheon Assas University with a Master in Bank and Finance and is a CFA Charter holder.

Andrea Pescatori is the founder and CEO of Ver Capital. Before establishing Ver Capital, Andrea earned 15 years of experience in fixed income and capital markets at Goldman Sachs, Merrill Lynch, Hill Samuel and Finprogetti. Andrea holds an MBA from SDA Bocconi University in Milan and graduated, magna cum laude, in Economics from La Sapienza University in Rome.

Laurent Dubois is the CEO of Sienna AM France. He began his career in structured products, developing and managing several new activities (structured finance, indexed repo, fund derivatives, insurance derivatives, regulatory optimization). In 2010, Laurent co-founded Alfafinance. In 2014, he joined the management of Acofi Gestion as Deputy Managing Director following the Alfafinance-Acofi merger. He is a graduate of ENSIMAG (Engineering) and holds a Master's degree in Finance from HEC.

Kateryna Lisovets is Sienna Real Estate CFO. She joined Sienna in 2022. Before she was senior manager at Quilvest Capital Partners. She worked at Deloitte Luxembourg as a financial auditor between 2010 and 2017. She graduated from Kyiv National Economic University in 2011.

### Number of executive members

Supervisory body: 1

Management Body: 21

### Number of non-executive members

Supervisory body: 5

Management body: 0

### Percentage of members of administrative, management and supervisory bodies by gender and other aspects of diversity

Supervisory body: 100% male, 0% woman

Management body: 72% male, 28% women

### Board's gender diversity ratio

0

### Percentage of independent board members

1/3

### Information about identity of administrative, management and supervisory bodies or individual(s) within a body responsible for oversight of impacts, risks and opportunities

Sienna IM's CEO is identified as ESG correspondent for both the Board of Directors (BoD) and the Management Committee (ManCo). In this capacity, he is tasked with overseeing and reporting on ESG-related matters, ensuring that Sienna IM aligns with sustainability goals and addresses the associated risks and opportunities effectively.

Additionally, the CSO of Sienna IM is also a member of the executive team.

The Chief Sustainability Officer is involved in managing the administrative aspects of ESG oversight, supporting the implementation of ESG initiatives, and facilitating communication between the ESG correspondent and other administrative functions within the organization.

### Disclosure on how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in undertaking's terms of reference, board mandates and other related policies

Sienna IM does not have specific terms of reference, board mandates, or related policies in place for their board.

Sienna is decisively committed to its ESG strategy with the support of its shareholder and senior management. Sienna relies on a strong governance system for the development, implementation and monitoring of its ESG strategy:

- The CEO is personally responsible for the strategy, its objectives, achievements and funding;
- The CEO has a dedicated ESG correspondent appointed to the Sienna IM Board of Directors;

The CEO is supported by the Chief Sustainability Officer, a member of the executive team, who reports directly to the CEO and is responsible for implementing Sienna IM's ESG strategy and driving the approach of the specialized subsidiaries by providing functional guidance to each ESG manager and approving the programs and communications put in place;

- The Chief Sustainability Officer leads the ESG Correspondent Network, which is made up of ESG managers within each of the Group's structures. He ensures that these managers report directly to a corporate officer, and that an ESG correspondent is appointed to the Board of Directors of each operating subsidiary;
- The Chief Sustainability Officer ensures that the group's practices are in line with the support of Sienna IM's CRCO.

## Description of management's role in governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities

Sienna is decisively committed to its ESG strategy with the support of its shareholder and senior management. Sienna relies on a best-in-class governance system for the development, implementation and monitoring of its ESG strategy:

- The CEO is personally responsible for the strategy, its objectives, achievements and funding;
- The CEO has a dedicated ESG correspondent appointed to the Sienna IM Board of Directors;

The CEO is supported by the Chief Sustainability Officer, a member of the executive team, who reports directly to the CEO and is responsible for implementing Sienna IM's ESG strategy and driving the approach of the specialized subsidiaries by providing functional guidance to each ESG manager and approving the programs and communications put in place;

- The CEO leads the ESG Strategy Committee, which brings together the corporate officers of the various product lines as well as members of the Executive Board and the Chief Risk and Compliance Officer ("CRCO");
- The Chief Sustainability Officer leads the ESG Correspondent Network, which is made up of ESG managers within each of the Group's structures. He ensures that these managers report directly to a corporate officer, and that an ESG correspondent is appointed to the Board of Directors of each operating subsidiary;
- The Chief Sustainability Officer ensures that the group's practices are in line with the support of Sienna IM's CRCO.

The roles for the DMA are distributed as follows within Sienna IM.

- Board of Directors: A presentation of the results of the double materiality analysis was submitted to Sienna IM's executive committee for validation. The executive committee is also involved in defining the company's ESG strategy (policy, projects, resources, performance, reporting, etc.).
- Chief Executive Officer: The Chief Executive Officer is personally responsible for the strategy, its objectives, its achievements, and its funding; he has a dedicated ESG correspondent, appointed to the Board of Directors of Sienna IM. The Chief Executive Officer is supported by the Chief Sustainability Officer, a member of the management team, who reports directly to the Chief Executive Officer and is responsible for implementing Sienna IM's ESG strategy and leading the approach of specialized subsidiaries by providing functional guidance to each ESG manager and approving the programs and communications put in place. The Chief Executive Officer leads the ESG Strategic Committee, which brings together the corporate officers of the different product lines as well as the members of the Board of Directors and the Director of Risk and Compliance ("CRCO").
- Chief Sustainability Officer: The Chief Sustainability Officer reports to the Chief Executive Officer and is responsible for (i) overseeing the elaboration of the DMA (including the development of the sustainability strategy), (ii) working closely with the Group Risk Controller and the other stakeholders for the alignment between the Group Risk Map and the DMA, (iii) managing the workshops sessions, (iv) submitting the DMA to the Board of Directors, for validation and (v) ensuring the proper achievement of the sustainability strategy and the publication of the annual sustainability statement.

## Description of how oversight is exercised over management-level position or committee to which management's role is delegated to

The board of directors is vested with the broadest powers to act in the name of the Company and to take any action necessary or useful to fulfil the Company's corporate purpose, with the exception of the powers reserved by the Law or by these articles of association to the general meeting of shareholders.

The governance roles are described above.

## Information about reporting lines to administrative, management and supervisory bodies

Each area of expertise at Sienna IM has a dedicated ESG team or correspondent who reports to the Chief Sustainability Officer (CSO).

Sienna is decisively committed to its ESG strategy with the support of its shareholder and senior management. Sienna relies on a best-in-class governance system for the development, implementation and monitoring of its ESG strategy:

- The CEO is personally responsible for the strategy, its objectives, achievements and funding;
- The CEO has a dedicated ESG correspondent appointed to the Sienna IM Board of Directors;

The CEO is supported by the Chief Sustainability Officer, a member of the executive team, who reports directly to the CEO and is responsible for implementing Sienna IM's ESG strategy and driving the approach of the specialized subsidiaries by providing functional guidance to each ESG manager and approving the programs and communications put in place;

- The CEO leads the ESG Strategy Committee, which brings together the corporate officers of the various product lines as well as members of the Executive Board and the Chief Risk and Compliance Officer ("CRCO");
- The Chief Sustainability Officer leads the ESG Correspondent Network, which is made up of ESG managers within each of the Group's structures. He ensures that these managers report directly to a corporate officer, and that an ESG correspondent is appointed to the Board of Directors of each operating subsidiary;
- The Chief Sustainability Officer ensures that the group's practices are in line with the support of Sienna IM's CRCO.

## Disclosure of how dedicated controls and procedures are integrated with other internal functions

Several committees are held at Sienna Group level. Each of them manage some sustainability topics related to the dedicated committee.

Sienna IM has three key committees:

- Monthly Meeting (ManCo): The Chief Sustainability Officer (CSO) is a member, ensuring that ESG topics are included in the discussions.
- Global Risk and Compliance Committee: Chaired by Chief Risk & Compliance Officer & RCCI, this committee addresses risk and compliance issues.
- Climate Committee: Focused on climate-related matters.

The CEO presides over all three committees, which are all connected to the ManCo. The CSO is a member of all three committees.

## Disclosure of how administrative, management and supervisory bodies and senior executive management oversee setting of targets related to material impacts, risks and opportunities and how progress towards them is monitored

Sienna's management approach involves measuring and monitoring its ESG actions through key performance indicators ("KPIs"). ESG KPIs are derived from the group's key achievement areas (or "ESG Commitments").

From 2023 onwards, the ESG KPIs are structured over a 3-year period and approved by the Sienna Board of Directors. New ESG KPIs related to the implementation of the ESG Policy have been approved by the Board of Directors of December 2022. They are reviewed annually or in case of changes in the ESG Policy.

During the three aforementioned committees, the Chief Sustainability Officer (CSO) provides reporting. This is part of the CSO's daily responsibilities. Additionally, each employee has an ESG objective.

## Disclosure of how administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee sustainability matters

Regarding the disclosure of how administrative, management, and supervisory bodies assess the availability or development of appropriate skills and expertise to oversee sustainability matters, Sienna IM has delegated this responsibility to the Chief Sustainability Officer (CSO).

The CSO is responsible of evaluating the existing sustainability competencies within the team and determining the need for further sustainability-related skill development among Sienna IM. Her role involves a thorough assessment of the current expertise in sustainability-related issues and identifying any gaps that may exist. Based on this assessment, she formulates training sessions to enhance the ESG expertise of Sienna IM's employees.

## Information about sustainability-related expertise that bodies either directly possess or can leverage

A dedicated ESG team regroups professionals deeply committed to integrating ESG principles into the Sienna IM's investment strategy. The ESG team is made up of 6 employees fully committed to ESG initiatives - including the Chief Sustainability Officer, the Head of Sustainable Finance(listed Assets), an ESG Manager (listed Assets), ESG analysts (listed Assets and Private Credit), a Chief Risk Officer (Private Credit).

This team is responsible for the development and implementation of Sienna IM's ESG integration process across all investments. Sienna IM has successfully classified 80% of its assets under management as Article 8 under the Sustainable Finance Disclosure Regulation (SFDR). Since 2022, Sienna IM has launched four impact funds, reflecting its proactive approach to sustainable investing.

The ESG DNA of Sienna IM is built on three foundational pillars: Climate, Biodiversity, and Diversity, Equity, and Inclusion (DE&I). The team's actions are guided by four main strategies: Exclusions, ESG Integration, Engagement, and Advocacy. These strategies are indicative of Sienna IM's holistic approach to sustainability, which is further reinforced by their certifications and memberships in various organizations such as the Principles for Responsible Investment (PRI) and the Carbon Disclosure Project (CDP).

The collective efforts of the ESG team at Sienna IM underscore the company's overarching philosophy that sustainable development is not only a social responsibility but also a driver of innovation and financial value creation. Through their work, the team ensures that Sienna IM remains at the forefront of responsible investment practices, setting a standard for the industry and contributing to a more sustainable future.

## Disclosure of how sustainability-related skills and expertise relate to material impacts, risks and opportunities

Sienna IM's dedicated ESG team, along with other relevant employees, engages in ongoing training to stay up to date of sustainability issues. This training session include both mandatory and voluntary courses designed to deepen their understanding of how sustainability relates to the company's operations and strategic objectives. By participating in these training programs, employees are better equipped to identify and manage material sustainability impacts, risks, and opportunities that the company faces.

## 7.4.4.1.10 Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies

### Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them

The ESG team at Sienna IM is responsible for regularly reporting on sustainability matters to key strategic committees and executive bodies. These include the Risks Committee, which is tasked with overseeing the identification and management of potential risks related to ESG issues; the ESG Correspondents Committee, which is composed of ESG representatives from various departments ensuring cross-functional integration of sustainability practices; the Management Committee (ManCo), which is responsible for the operational management and strategic direction of the company; and the Board of Directors (BoD), which provides the ultimate oversight and governance.

- Risk Committee: Meets quarterly.
- ESG Correspondent Committee: Meets every two months.
- ManCo: Meets every two weeks, but the Chief Sustainability Officer (CSO) attends for specific ESG topics (e.g., SBTi).
- Board of Directors: Holds 4 or 5 meetings annually, with ESG topics discussed at least twice, either by the CSO or the CEO.

### Disclosure of how administrative, management and supervisory bodies consider impacts, risks and opportunities when overseeing strategy, decisions on major transactions and risk management process

The different bodies are currently better learning how to consider impacts, risks and opportunities when overseeing strategy, decisions on major transactions and risk management process. This first CSRD report is an excellent exercise to improve.

At the end of 2024 (December 10), the Chief Sustainability Officer (CSO) provided an update to the Global Risk and Compliance Committee (GRCC) on the main areas for improvement following the DMA, including various data points and other relevant topics.

### Disclosure of list of material impacts, risks and opportunities addressed by administrative, management and supervisory bodies or their relevant committees

The Chief Sustainability Officer reports to the Chief Executive Officer and is responsible for (i) overseeing the elaboration of the DMA (including the development of the sustainability strategy), (ii) working closely with the Group Risk Controller and the other stakeholders for the alignment between the Group Risk Map and the DMA, (iii) managing the workshops sessions, (iv) submitting the DMA to the Board of Directors, for validation and (v) ensuring the proper achievement of the sustainability strategy and the publication of the annual sustainability statement.

All IROs described as material in the DMA were presented in different committees.

The DMA workshops participants are people involved and/or responsible for managerial, operational and support processes participate in the elaboration and update of the DMA. They are involved to identify, assess and validate the completeness of the list of Impacts, Risks and Opportunities (IROs) and the materiality assessment on the sustainability matters in their areas of responsibility. The Chief of Sustainability Officer attended all the IROs identification and scoring workshops.

### 7.4.4.1.11 Integration of sustainability-related performance in incentive schemes

#### Description of key characteristics of incentive schemes

Members of Sienna IM's board of directors don't have any ESG-related considerations factored into their remuneration.

Sienna IM's senior management have some ESG-related considerations factored into their variable remuneration. A long-term incentive plan was put in place in 2023 and includes the SBTi validated status obtention.

Some Sienna IM employees may have some ESG-related considerations factored into their variable remuneration, as stated in Sienna Private Credit's Art 29 LEC report (https://www.sienna-im.com/wp-content/uploads/2024/06/sienna-im-private-credit_rapport-art--29-lec_2023.pdf) and in Sienna Gestion Art 29 LEC report (https://www.sienna-gestion.com/sites/default/files/2024-07/Rapport%20Article%2029%20de%20la%20loi%20relative%20%C3%A0%20l%27%C3%A9nergie%20et%20au%20climat%20-%20Exercice%202023.pdf). For other expertise of Sienna IM Group, their employees may also have some ESG-related considerations factored into their remuneration as 100% of Sienna IM employees were requested as from 2023 to have ESG objectives into their annual objectives. Depending on their work, it can be climate, other environmental topic and/ or social related.

At Sienna Gestion, the criteria for determining this variable compensation must specify:

- The maximum percentage of variable compensation relative to the fixed annual salary;
- The percentage of compensation derived from the achievement of collective quantitative performance and a percentage distribution of the collective and individual share in achieving these performances; the target formulas are clearly formalized;
- The percentage of compensation deriving from the achievement of qualitative performances, including notably compliance with regulations, ethics, and Sienna Gestion's risk management policy.

This qualitative component of the variable compensation incorporates sustainability risks, in accordance with Article 3 of the SFDR Regulation. The Risk and Compliance Department measures these risks by ensuring that the rules applicable to funds promoting ESG characteristics are adhered to by the managers. Controls focus on the minimum level of investment in securities eligible for the investment universes defined by the Responsible Finance team, after the application of exclusion policies and ESG analysis criteria.

At Sienna Private Credit, for employees involved in funds' management with sustainable investment objectives through the implementation of E and S criteria, individual appraisals and objectives will include qualitative and quantitative elements linked to the achievement or non-achievement of the sustainable investment objectives set (in particular the objective of deploying E and S investments). In addition, the company's profit-sharing agreements include targets for ESG indicators such as 'S' (employee training, parity) and 'E' (the company's carbon footprint).

#### Description of specific sustainability-related targets and (or) impacts used to assess performance of members of administrative, management and supervisory bodies

N/A for members of Sienna IM's board of directors.

Sienna IM's senior management have some ESG-related considerations factored into their variable remuneration. A long-term incentive plan was put in place in 2023 and includes the SBTi validated status obtention.

Some Sienna IM employees may have some ESG-related considerations factored into their variable remuneration, as stated in Sienna Private Credit's Art 29 LEC report (https://www.sienna-im.com/wp-content/uploads/2024/06/sienna-im-private-credit_rapport-art--29-lec_2023.pdf) and in Sienna Gestion Art 29 LEC report (https://www.sienna-gestion.com/sites/default/files/2024-07/Rapport%20Article%2029%20de%20la%20loi%20relative%20%C3%A0%20l%27%C3%A9nergie%20et%20au%20climat%20-%20Exercice%202023.pdf). For other expertise of Sienna IM group, their employees may also have some ESG-related considerations factored into their remuneration as 100% of Sienna IM employees were requested as from 2023 to have ESG objectives into their annual objectives. Depending on their work, it can be climate, other environmental topic and/ or social related.

#### Disclosure of how sustainability-related performance metrics are considered as performance benchmarks or included in remuneration policies

The achievement of annual ESG objectives has a direct impact on the variable remuneration (when it exists).

Furthermore, the remuneration policies of Sienna Gestion and Sienna AM France include ESG criteria and no sustainability-related performance metrics are included in remuneration policies.

#### Percentage of variable remuneration dependent on sustainability-related targets and (or) impacts

The top management of Sienna Group has 50% of their common objectives tied to variable remuneration, with one specific SBTi target accounting for 12.5% of their long-term variable remuneration.

### Description of level in undertaking at which terms of incentive schemes are approved and updated

In France, saving-schemes mechanism is reviewed every 3 years and validated by social bodies. This is valid for Sienna Gestion and Sienna AM France.

Furthermore, the long-term incentive plan is reviewed every 3 years and approved by Sienna's board of directors.

### Disclosure of mapping of information provided in sustainability statement about due diligence process

The outcome of Sienna IM's sustainability due diligence process informs the assessment of its material impacts, risks, and opportunities. The ESRS do not impose any conduct requirements in relation to sustainability due diligence, nor do they extend or modify the role of governance bodies.

Sustainability due diligence involves identifying, preventing, mitigating, and accounting for actual and potential negative impacts on the environment and people connected with the business. This includes impacts caused or contributed by the undertaking and those directly linked to its operations, products, or services through business relationships. This ongoing practice adapts to changes in strategy, business model, activities, and contexts, as described in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

As part of its ESG integration policy, Sienna IM implements robust processes for identifying ESG controversies and potential risks at the pre-investment stage. The ESG due diligence work is specific to each investment process and is detailed in the respective ESG integration frameworks. Findings from these processes are documented in the investment or financing recommendations provided to the Investment Committee responsible for the investment decision. The mapping covers all relevant topics, which will be detailed in the following sections.

## 7.4.4.1.12 Risk management and internal controls over sustainability reporting

### Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting

The sustainability reporting is under the Chief Sustainability Officer responsibility. The CSO reports regularly on the progress of the reporting to Sienna's Management Committee and to Sienna's board of directors.

The control mechanism for sustainability reporting at Sienna IM involves thorough review by the Chief Risk & Compliance Officer and RCCI. Additionally, the Chief Sustainability Officer primarily addresses the top management of various departments (HR, sales, etc.) to ensure comprehensive oversight and alignment. This process ensures that all aspects of sustainability reporting are accurately reviewed and communicated across the organization.

### Description of risk assessment approach followed

The DMA has two interrelated objectives:

1. Informing top management and providing those responsible for the sustainability strategy with the clear vision of sustainability IROs.
2. Ensuring that the sustainability strategy is adapted to the risks identified and assessed.

The objective of the Double Materiality Assessment Protocol is to document the process defined, implemented, and controlled by Sienna IM with respect to its DMA conducted as part of its commitment to reporting under the European Corporate Sustainability Reporting Directive ("CSRD").

In establishing quantitative and qualitative scales of impact materiality and financial materiality, Sienna IM conducted two dedicated workshops with the ESG team and the Chief Risk and Compliance Officer (CRCO) to assess and validate expert judgment-based thresholds aligned with Sienna IM's business model and specificities.

The Methodological Protocol of Sienna IM defines the methodology, boundary and scope, controls, communication and update of Sienna IM's DMA. Each step of the process executed to identify the list of the material IROs is subject to supporting evidence or documentation.

The present protocol will be subject to an annual review for re-validation purpose in the perspective of the preparation of the sustainability information to be disclosed in Sienna IM's Annual report. However, significant circumstances or events triggering a change in the strategy, business model or activities will require to consider updating the double materiality assessment.

### Description of main risks identified and their mitigation strategies

Sienna IM is convinced that there is a strong negative correlation between extra-financial risks and the financial or economic value of an issuer. For this reason, the management company places the reduction of extra-financial risks at the heart of its responsible investment strategy.

Sienna Gestion has put in place a system and an organisation that enables the entire management team to take into account the risks associated with ESG issues. In addition to the management teams, Sienna Gestion has a team dedicated to compliance, internal control and risk, which is independent of the operating units.

Its director is a member of the Management Board. This team regularly carries out due diligence to verify the reliability of the SRI process and compliance with the investment constraints applicable to SRI funds.

This team is also responsible for validating all the structuring documents formalised within Sienna Gestion on the SRI approach (SRI policy, procedures, reports, etc.).

**[IRO 1] :** Financial risk related to the insufficient consideration of physical climate risks on investments, particularly in physical assets (private debt).

**Mitigation strategies :** Implementing thorough climate risk assessments and integrating climate resilience criteria into investment decisions.

**[IRO 3]:** Financial and reputational risk related to the insufficient consideration of transition climate risks in investment decisions.

**Mitigation strategies :** Incorporating transition risk analysis into the investment process and maintaining transparent communication with stakeholders.

**[IRO 6] :** Employee retention risk related to the insufficient consideration of ESG issues.

**Mitigation strategies :** Enhancing ESG training programs and ensuring that ESG considerations are embedded in the company culture.

**[IRO 10]:** Risk associated with the security and protection of internal data to prevent the leakage of sensitive information.

**Mitigation strategies :** Strengthening cybersecurity measures and conducting regular audits to ensure data protection.

**[IRO 11] :** Risk of lack of transparency and/or clarity of investor information (financial and ESG), which could lead to client dissatisfaction or even sanctions.

**Mitigation strategies :** Improving disclosure practices and ensuring that all investor communications are clear, accurate, and comprehensive.

**[IRO 12]:** Risk of mismatch between marketed/subscribed ESG products and client preferences in this regard (labels, Taxonomy, ESG themes, etc.).

**Mitigation strategies :** Conducting regular market research to align product offerings with client preferences and regulatory requirements.

**[IRO 13]:** Risk related to Sienna's inability to meet the ESG due diligence requirements of its institutional or corporate clients (carbon footprint, responsible procurement policy, HR policy - diversity, etc.).

**Mitigation strategies :** Enhancing ESG due diligence processes and ensuring compliance with client-specific requirements.

**[IRO 15] :** Risk of "sustainability washing" (greenwashing, social washing, and impact washing) at the level of financial products.

**Mitigation strategies :** Implementing rigorous verification processes and maintaining transparency in sustainability claims.

**[IRO 16] :** Risk related to non-compliance with Sienna's values and various ESG codes, policies, and processes that govern investments and daily activities (which can manifest as reputational and regulatory risk).

**Mitigation strategies :** Reviewing and updating ESG policies and ensuring strict adherence to these guidelines.

**[IRO 17] :** Financial and operational risks related to non-compliance with ethical rules (personal transactions, gift declarations and external functions/mandates, fraud, market manipulation, professional misconduct, or other financial sector laws and regulations, etc.).

**Mitigation strategies :** Establishing robust compliance programs and conducting regular training on ethical standards.

**[IRO 18] :** Risk related to insufficient AML/CFT due diligence.

**Mitigation strategies :** Strengthening AML/CFT procedures and conducting regular compliance audits.

**[IRO 19] :** Risk related to non-compliance with (i) the ESG regulations to which Sienna is subject (SFDR, Art29 LEC, CSRD, PRI, etc.), (ii) the expectations of supervisors (AMF), (iii) the commitments made by Sienna (PRI, SBTi), and/or (iv) mandate-related requests.

**Mitigation strategies :** Ensuring continuous monitoring of regulatory changes and maintaining compliance with all relevant ESG regulations and commitments.

**[IRO 20] :** Risk related to the publication of financial reports and information required under existing and developing regulations, with the risk of significant inaccuracies.

**Mitigation strategies :** Implementing stringent review processes and ensuring accuracy in all financial and regulatory reporting.

**[IRO 21] :** Risk related to the general IT environment (including hardware, network, backup systems, software, etc.), the integrity of Sienna's data, and cybersecurity (attempts of fraud and hacking).

**Mitigation strategies :** Enhancing IT infrastructure and cybersecurity protocols to protect against potential threats.

**[IRO 23] :** Risk related to the management of ESG data (sourced directly from companies or data providers).

**Mitigation strategies :** Ensuring the reliability and accuracy of ESG data through rigorous data validation processes.

**[IRO 24] :** Financial, legal, and/or reputational risk due to relationships with invested companies that may have negative impacts on the environment, social aspects, and/or governance.

**Mitigation strategies :** Conducting thorough due diligence on investee companies and actively engaging with them to address ESG concerns.

### Description of how findings of risk assessment and internal controls as regards sustainability reporting process have been integrated into relevant internal functions and processes

Sienna IM does not integrate yet the findings of its risk assessment and internal controls regarding the sustainability reporting process into relevant internal functions and processes.

### Description of periodic reporting of findings of risk assessment and internal controls to administrative, management and supervisory bodies

Sienna IM does not provide a description of the periodic reporting of the findings referred to in point (d) to the administrative, management, and supervisory bodies for 2024, but plans to implement this in 2025.

## 7.4.4.1.13 Operating sector

### Description of significant groups of products and (or) services offered

Sienna IM is a multiple-expertise pan-European asset manager. Spanning listed and private assets (real estate, private debt), Sienna IM builds bespoke and innovative solutions for its clients, with purpose.

Sienna IM seeks to challenge the status quo and change mindsets with the firm belief that today's investments shape the communities of tomorrow. While we naturally strive for performance, we are also committed to privilege investments that have a positive impact. In the current environment, investors are looking for more than results: their asset managers must commit to making a difference, while anticipating, analyzing, and managing risk in a judicious and agile manner.

Our clients benefit from all the experience and knowledge of the listed and private markets that Sienna IM's investment professionals have accumulated over many years within the GBL Group.

Sienna Gestion is the Group's listed assets expertise, which manages listed equity, Fixed Income and diversified funds for clients across Europe, drawing on more than 30 years of experience.

Sienna Real Estate is the Group's real estate exertise, which acquires and manages commercial real estate for clients across Europe, drawing on more than 30 years of experience in the pan-European real estate investment and asset management market. Sienna Real Estate positions itself as a long-term strategic partner to local and international investors, advising and supporting them throughout the property investment cycle, from the acquisition and administration of the asset or property, through to the sales process. In addition to providing advice, Sienna Real Estate also acts as a co-investor in certain projects.

Sienna Private Credit expertise meets the needs of institutional investors by offering private credit solutions. This entity, resulting from the acquisition of Acofi Gestion in 2022 and Ver capital in 2024, specialises in the management of loan funds within the Eurozone.

These initiatives focus mainly on financing real assets and direct loans to economic players in four sectors: investment property, collateralised corporate financing (SMEs) and infrastructure, mainly renewable energy, as well as financing for the non-government public sector (local authorities and public health institutions).

### Description of significant markets and (or) customer groups served

Sienna IM's clients include institutional investors, employee savings plans, and direct retail clients (B2B2C). The market primarily consists of European clients, with the exception of the real estate sector, which also includes clients from Asia and the Middle East.

Our clients benefit from all the experience and knowledge of the listed and private markets that Sienna IM's investment professionals have accumulated over many years within the GBL group.

With over €37 billion under management (as of June 2024), Sienna Investment Managers provides support to companies and individuals that want to see a sustainable and inclusive economy.

Sienna IM currently employs nearly 260 people in eight countries: Luxembourg, France, Germany, Switzerland, the Netherlands, the United Kingdom, Spain and South Korea. Sienna IM is organised around a multi-expertise model and operates as a pan-European platform dedicated to managing investment and savings solutions for clients. This structure meets the needs of investors wishing to give meaning to their investments, whether in real assets or liquid instruments.

Our clients are institutional clients and retail clients, mainly European ones.

## Description of products and services that are banned in certain markets

Sienna's activities (for listed assets and private debt expertise) are subject to European regulations in terms of both investment and distribution. As such, certain products are reserved for certain types of clients, with a view to protecting investors, depending on their assets and skills in terms of investments and related risks.

In addition, strict rules are laid down for access to the markets of the Member States (European passport procedure) and for certain customer segments and/or products and services, specific rules exist in certain Member States.

The approach to non-EU markets is also regulated.

Sienna IM complies with all these regulations, which may make it impossible to market certain products to certain types of customers in certain geographical areas.

## The undertaking shall map its significant activities in accordance with ESRS sectors

Sienna IM is a multiple-expertise pan-European asset manager. Spanning listed and private assets (real estate, private debt), Sienna IM builds bespoke and innovative solutions for its clients, with purpose.

All material ESRS are relevant for each significant activities of Sienna: ESRS E1, S1, S4 and G1.

Sienna Gestion is the Group's listed assets expertise, which manages listed equity, Fixed Income and diversified funds for clients across Europe, drawing on more than 30 years of experience.

Sienna Real Estate is the Group's real estate exertise, which acquires and manages commercial real estate for clients across Europe, drawing on more than 30 years of experience in the pan-European real estate investment and asset management market. Sienna Real Estate positions itself as a long-term strategic partner to local and international investors, advising and supporting them throughout the property investment cycle, from the acquisition and administration of the asset or property, through to the sales process. In addition to providing advice, Sienna Real Estate also acts as a co-investor in certain projects.

Sienna Private Credit expertise meets the needs of institutional investors by offering private credit solutions. This entity, resulting from the acquisition of Acofi Gestion in 2022 and Ver capital in 2024, specialises in the management of loan funds within the Eurozone.

These initiatives focus mainly on financing real assets and direct loans to economic players in four sectors: investment property, collateralised corporate financing (SMEs) and infrastructure, mainly renewable energy, as well as financing for the non-government public sector (local authorities and public health institutions).

## Total Revenue/Gross Revenue

11,821,027,314.00 EUR

## Revenue by significant ESRS Sectors

Not available

## List of ESRS sectors that are significant for undertaking

Please refer to each specific ESRS section

## List of additional significant ESRS sectors in which significant activities are developed or in which undertaking is or may be connected to material impacts

The sector-specific topics integrate, on a high-level basis, the environmental, social and governance impacts related to investee companies' activities. For this reason, and pending the publication of a dedicated sector specific ESRS, the ESRS E2, E3, E4, S2 and S3 are not considered at a micro scale, but on a broader scale at sector specific IROs level.

## Undertaking is active in fossil fuel (coal, oil and gas) sector

Sienna IM does not operate in these sectors, but as third party portfolio managers we may hold investments in companies in these sectors.

To estimate the entity's exposure to fossil fuels, the Principal Adverse Impact (PAI) indicator No. 4 "Exposure to companies active in the fossil fuel sector" is used. Companies active in the fossil fuel sector refer to those deriving revenue from exploration, mining, extraction, production, processing, storage, refining, or distribution, including transportation, warehousing, and trading of fossil fuels as defined in Article 2, point 62, of Regulation (EU) 2018/1999 of the European Parliament and of the Council.

Sienna Gestion's exposure to fossil fuels: 4.1% (as of end 2023). As of December 29, 2023, Sienna Gestion held shares in 40 companies exposed to fossil fuels.

This exposure was 6.53% in 2022 for 48 held companies.

To establish the entity's exposure to fossil fuels, the PAI 4 "Company's exposure to fossil fuels" was used based on information from Morningstar Sustainalytics. A company is considered exposed as soon as it is active in the fossil sector, regardless of the share represented by this sector in its turnover.

Sienna Private Credit expertise's exposure to fossil fuel represents 0, as the Coal, Oil and Gas sectors are excluded.

Sienna Real Estate expertise exposure to fossil fuel represents 0 as they invest in Real Estate.

## Undertaking is active in chemicals production

Sienna IM does not operate in these sectors, but as third party portfolio managers we may hold investments in companies in these sectors.

Sienna IM is exposed through its listed assets related activities.

## Undertaking is active in controversial weapons

As a responsible company and as a responsible investor, Sienna IM is not active in controversial weapons.

Controversial weapons sector is the subject of a specific section in Sienna IM's exclusion policy:

Sienna excludes investments in organizations directly involved in the development, production, maintenance and trading of controversial weapons. Banned or controversial weapons are those that fall under the scope of the following international conventions:

- Anti-personnel landmines as defined in Article 2 of the 1997 Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction (Anti-Personnel Mine Ban Convention, Ottawa Treaty);
- Cluster munitions as defined in Article 2 of the Convention on Cluster Munitions from 2008 (Convention on Cluster Munitions, Oslo Treaty);
- Biological and toxin weapons as defined in Article I of the 1972 Convention on the Prohibition of the Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on their Destruction (Biological Weapons Convention);
- Chemical weapons as defined in Article II of the 1992 Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on their Destruction (Chemical Weapons Convention).

## Undertaking is active in cultivation and production of tobacco

As a responsible company and as a responsible investor, Sienna IM is not active in cultivation and production of tobacco.

Tobacco sector is the subject of a specific section in Sienna IM's exclusion policy:

Considering public health concerns associated with tobacco, but also human rights abuses, poverty impact, environmental consequences, and the substantial economic cost associated with tobacco, Sienna excludes direct investments in the production of tobacco products (thresholds for application: revenues above 5%).

Sienna also excludes direct investments in the supply and distribution of tobacco products if they represent a significant contribution to the company's turnover (application thresholds for application: revenues above 50%).

## Revenue from fossil fuel (coal, oil and gas) sector

0. In the absence of official guidance, cf. FAQ 482, we only calculated these revenue for our own operations. Disclosures do not cover revenues coming from portfolio activities.

### Revenue from coal

0. In the absence of official guidance, cf. FAQ 482, we only calculated these revenue for our own operations. Disclosures do not cover revenues coming from portfolio activities.

### Revenue from oil

0. In the absence of official guidance, cf. FAQ 482, we only calculated these revenue for our own operations. Disclosures do not cover revenues coming from portfolio activities.

### Revenue from gas

0. In the absence of official guidance, cf. FAQ 482, we only calculated these revenue for our own operations. Disclosures do not cover revenues coming from portfolio activities.

### Revenue from Taxonomy-aligned economic activities related to fossil gas

0. In the absence of official guidance, cf. FAQ 482, we only calculated these revenue for our own operations. Disclosures do not cover revenues coming from portfolio activities.

### Revenue from chemicals production

0. In the absence of official guidance, cf. FAQ 482, we only calculated these revenue for our own operations. Disclosures do not cover revenues coming from portfolio activities.

### Revenue from controversial weapons

0. In the absence of official guidance, cf. FAQ 482, we only calculated these revenue for our own operations. Disclosures do not cover revenues coming from portfolio activities.

### Revenue from cultivation and production of tobacco

0. In the absence of official guidance, cf. FAQ 482, we only calculated these revenue for our own operations. Disclosures do not cover revenues coming from portfolio activities.

### Description of sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders

Sienna IM has three qualitative sustainability goals: integrating climate considerations, promoting biodiversity, and enhancing diversity and inclusion (D&I).

### Disclosure of assessment of current significant products and (or) services, and significant markets and customer groups, in relation to sustainability-related goals

The assessment of performance in relation to sustainability goals at Sienna IM involves the implementation of specific policies. For climate-related goals, performance can be evaluated through the achievement of SBTi (Science Based Targets initiative) certification.

## Disclosure of elements of strategy that relate to or impact sustainability matters

Sienna IM's sustainability strategy is based on several pillars:

A sustainable investment policy that focuses on several key areas:

- The definition and systematic implementation of sectoral and normative exclusions. These exclusions, which concern the entire perimeter, enable us to apply the best international standards, particularly in terms of social and human rights, but also to exclude sectors that are incompatible with the environmental transition.

Details of these exclusions are set out in Sienna IM's Exclusion Policy.

- ESG criteria are taken into account throughout the investment process. From the analysis of issuers to the investment decision and the sale of a stake, each stage is based on a 360° vision, integrating both financial and ESG data.
- Implementing a stewardship strategy. Sienna IM aims to act as an engaged investor, committed to the companies in our portfolios, helping them to take greater account of environmental and social issues. To this end, we maintain a regular dialogue with all these companies and strive to exercise our voting rights in asset classes where we have them.
- Supporting advances in sustainable finance through active advocacy. Within the financial industry and with its stakeholders, Sienna IM promotes a responsible, long-term investment approach. In particular, we seek to contribute to constructive advances in the sustainable finance framework, by participating in industry consultations and discussions.

A systemic approach, which seeks to address 3 subjects together:

- Climate
- Biodiversity
- Diversity, equity & inclusion

This approach applies to both our investments and our own operations.

## Description of business model and value chain

The methodological mapping assessment is conducted at a high level in order to capture the full spectrum of Sienna IM 's operations.

The value chain of Sienna IM has been crafted by delineating the firm's core activities, which include :

- Real estate activities under Sienna Real Estate. The real estate expertise of Sienna IM is used to acquire and manage commercial properties across Europe, drawing on over 30 years of experience in the pan-European real estate market.

The real estate team at Sienna IM acts as a long-term strategic partner for local and international investors, offering advice and support throughout the investment cycle, from acquisition and management to the sales process.

- Private debt activities through Sienna 2A. The private credit expertise of Sienna IM is used to develop investment products and solutions that meet the expectations of major investors. These initiatives primarily focus on financing real assets and providing direct loans to economic actors in four sectors: investment real estate, collateralized financing for SMEs and mid-sized companies, renewable energy infrastructure, and public sector financing excluding the state (local authorities and public health institutions).
- Listed and hybrid assets management through Sienna Gestion. For the "hybrid" investment strategy, Sienna IM provides differentiated investment solutions for private investors by combining multiple asset classes. This innovative approach helps reconcile the need for economic financing with the need for medium to long-term returns, while also offering reduced volatility. The philosophy of this investment strategy is based on three pillars: Asset Allocation, Decorrelation, and Diversification.

Sienna Gestion is a longstanding player in financial savings in France. The company offers multi-asset investment solutions for private and institutional investors, with a strong social and environmental commitment.

These are complemented by a framework of supporting activities.

## Description of inputs and approach to gathering, developing and securing inputs

In structuring the core activities, Sienna IM has adopted a holistic and cross-sectional approach. The value chain has been intricately divided into four interconnected key stages that are consistent within Sienna IM's trio of primary activities. These stages are:

- **Conception/Marketing:** this initial stage involves the strategic conceptualization and marketing of investment products, ensuring their alignment with market demands and the Sienna IM's investment philosophy.
- **Commercialisation:** the effective dissemination of investment opportunities to potential clients, using a network of channels to reach diversified stakeholders.
- **Portfolio Management:** at this juncture, the emphasis is on the diligent oversight and active management of investment portfolios to optimize performance and mitigate risks.
- **Real Estate Expertise:** this final stage is dedicated to the hands-on management of real estate assets, ensuring their maintenance, tenant satisfaction, and value appreciation over time.

The end-of-life aspect of products has not been factored into the DMA, nor in the value chain, as it is deemed to have low materiality in the context of Sienna IM's management of European product scale. The end-of-life process is managed for Sienna IM's products as follows:

- **Sienna Gestion:** the end-of-life of a product typically results in either the merging of two funds or the closure of a mandate.
- **Sienna Private Credit:** when a fund reaches the end of its life (no more debt, fully repaid), it has a predetermined limited duration.

The framework of supporting activities encompasses:

- **ESG Research:** integrating ESG criteria and analysis of risks and dependencies throughout the entire life of the product.
- **Risk and Compliance:** managing risks, compliance and legal requirements through internal controls and policies.
- **Human Resources:** managing human resources through training, recruitment, career development, etc.
- **IT:** managing IT related infrastructures, solutions and data protection/security aspects.
- **Procurement:** managing purchases.
- **Finance:** managing accounting, management control, tax, etc.

## Description of outputs and outcomes in terms of current and expected benefits for customers, investors and other stakeholders

Sienna's DNA is to act with purpose to protect the future. Hence, we are fully involved in the development of our communities both at the corporate and at our stakeholder levels: our investee companies, our clients, the territories where we invest, and our teams.

As a multiple-expertise pan-European asset manager, Sienna IM aims to develop innovative bespoke and investment solutions for its client, designed to have a positive impact on the major social and environmental challenges we face.

Sienna's role is to directly finance the economy with a medium to long-term vision, therefore, we are committed with the companies we invest in . To do so, we have developed an ambitious CSR strategy directed both at Sienna and at our investee companies. As such, we systematically focus on climate, biodiversity and DE&I challenges and make our best to implement real-life solutions.

Furthermore, clients' outcome will directly depend on each type of clients. We can summarise them with managing their money within a given risk/return framework, with an obligation of means and with a clear and comprehensible product offering for the different categories of customers. Our main role is not to finance the economy; this aspect is the result of our primary objective (investing our customers' money...).

## Description of main features of upstream and downstream value chain and undertakings position in value chain

The value chain can be broken down into three segments:

- own operations (mainly investment activities)
- **upstream:** suppliers. As a financial institution, Sienna IM mainly engages with suppliers such as consultants and data providers, which have limited environmental and social impacts. For this reason - due to the nature of the suppliers (non-manufactured activities) – suppliers tiers 1, 2 and 3 are not considered material in Sienna IM's double materiality analysis.
- **downstream:** clients, distributors and investee companies (considered at high level for the CSRD report)

## 7.4.4.1.14 Interests and views of stakeholders

### Description of stakeholder engagement

Sienna IM ‘s sustainability strategy is related to engagement at several levels: with investee companies, through advocacy and with our prospects/ clients.

As such, Sienna IM takes into account its stakeholders within its strategy and business model.

### Description of key stakeholders

Sienna IM engage with several types of stakeholders:

- Clients. Sienna IM puts the clients at its heart and we always answer to our clients’ needs.
- **Suppliers:** we put in place a Responsible Purchase policy in 2023, where we engage with our suppliers on dedicated topics.
- **NGOs:** Sienna IM also engage with NGOs, which are an important part of the civil society.
- **Investee companies:** dialog with investee companies is of utmost importance. Depending on the asset class, we may participate to collaborative engagement (Climate Action 100+, Spring, Club 30 France for instance). We also vote whenever we can. And we dialog a lot before any private debt financing.
- **Public authorities and professional associations (AFG, France Invest for instance):** Sienna IM participates to public consultations, either directly or through professional associations (Sienna is member of the Responsible Investment Committee at AFG for instance).

### Description of categories of stakeholders for which engagement occurs

In accordance with ESRS 1 §3.1, the stakeholders identified by Sienna IM are spread over the following categories:

- **External stakeholders:** it covers the individuals or groups whose interests are affected or could be affected – positively or negatively – by the Sienna IM’s activities and its indirect business relationships across its value chain. Sienna IM has identified different main external stakeholders, among which GBL and Malakoff Humanis to be integrated into the DMA process.
- GBL is both the majority shareholder of Sienna IM and a strategic partner in third-party asset management,
- Malakoff Humanis is Sienna IM minority shareholder, delegates mandates and dedicated funds management and has various service agreements related to Sienna IM.
- On top of them, our external stakeholders also covers our clients and distributors, our service providers, investee companies, local authorities and civil society.
- **Internal stakeholders:** it covers the individuals or groups whose interests are affected or could be affected – positively or negatively – by the Sienna IM’s activities and its direct business relationships across its value chain. Internal stakeholders are people involved and/or responsible for managerial, operational and support processes. Each Head of an activity, an expertise or a Direction has been identified to participate in the elaboration of the DMA.

A list of the stakeholders identified to support the DMA process can be found in appendix section in the DMA Methodological Protocol.

### Description of how stakeholder engagement is organised

Depending on the type of stakeholders engagement is made, the organisation will be different.

Regarding investee companies, SGE has two types of engagement. First the reactive engagement, which is initiated due to a controversy encountered by a firm. SGE in this case would initiate a dialogue with the firm to understand its input regarding the controversy and to understand its corrective measures. Second, the proactive engagement, which is due to a lack of transparency or an absence of a robust strategy related to ESG matters. (considered a risk that could potentially lead to a controversy)

Hence, our engagement process consist of either engaging with firms through dialogue and a voting process, or collective engagement in case of public assets.

Regarding public authorities, Sienna IM can either directly do advocacy or through professional associations.

Regarding NGOs, Sienna IM engage with NGOs on specific topics.

Regarding suppliers, Sienna IM sends to each main supplier our Responsible Purchase policy.

## Description of purpose of stakeholder engagement

Through its engagement approach, Sienna IM, in line with its responsible investment policy:

- To influence companies towards better ESG practices, compliance with international standards and frameworks regarding climate change mitigation or social practices.
- To encourage issuers to measure their extra-financial performance, in order to track the impacts of their activities.
- To encourage greater transparency from companies regarding how they address ESG issues.
- To define a product range in line with our clients and distributors' requests.

## Description of how outcome of stakeholder engagement is taken into account

Depending on the type of stakeholders engagement is managed, the outcome may be different.

For instance, with our suppliers, we may decide to choose another supplier. With investee companies, we may divest if the engagement does not succeed.

## Description of understanding of interests and views of key stakeholders as they relate to undertaking's strategy and business model

Most of our sustainable impacts come from our investee companies, rather than our own operations. We place engagement with investee companies at the heart of our engagement strategy.

Key stakeholders at Sienna IM include clients and invested companies. Clients' interests and views are collected through questionnaires, ensuring their feedback is considered in our strategy and business model. For invested companies, Sienna Gestion engages in collaborative engagement, while SPC and Ver Capital engage directly with companies as part of their investment processes.

## Description of amendments to strategy and (or) business model

No amendments have been made.

## Description of how strategy and (or) business model have been amended or are expected to be amended to address interests and views of stakeholders

No amendments have been made.

## Description of any further steps that are being planned and in what timeline

No amendments have been made.

## Further steps that are being planned are likely to modify relationship with and views of stakeholders

No amendments have been made.

### Description of how administrative, management and supervisory bodies are informed about views and interests of affected stakeholders with regard to sustainability-related impacts

Sienna's CSO directly reports to the CEO. The CEO is responsible for the sustainable strategy at the Management Committee level and at the Board of Directors level. Some regular communication are organised with the different levels of governance at Sienna.

The roles for the DMA are distributed as follows within Sienna IM.

- **Board of Directors:** A presentation of the results of the double materiality analysis was submitted to Sienna IM's executive committee for validation. The executive committee is also involved in defining the company's ESG strategy (policy, projects, resources, performance, reporting, etc.).
- **Chief Executive Officer:** The Chief Executive Officer is personally responsible for the strategy, its objectives, its achievements, and its funding; he has a dedicated ESG correspondent, appointed to the Board of Directors of Sienna IM. The Chief Executive Officer is supported by the Chief Sustainability Officer, a member of the management team, who reports directly to the Chief Executive Officer and is responsible for implementing Sienna IM's ESG strategy and leading the approach of specialized subsidiaries by providing functional guidance to each ESG manager and approving the programs and communications put in place. The Chief Executive Officer leads the ESG Strategic Committee, which brings together the corporate officers of the different product lines as well as the members of the Board of Directors and the Director of Risk and Compliance ("CRCO").
- **Chief Sustainability Officer:** The Chief Sustainability Officer reports to the Chief Executive Officer and is responsible for (i) overseeing the elaboration of the DMA (including the development of the sustainability strategy), (ii) working closely with the Group Risk Controller and the other stakeholders for the alignment between the Group Risk Map and the DMA, (iii) managing the workshops sessions, (iv) submitting the DMA to the Board of Directors, for validation and (v) ensuring the proper achievement of the sustainability strategy and the publication of the annual sustainability statement.

## 7.4.4.1.15 Material impacts, risks and opportunities and their interaction with strategy and business model

### Description of material impacts resulting from materiality assessment

#### ESRS E1

**[IRO 2] :** Positive impact via direct financing and loans in the energy transition sector.

**Value chain : Invested companies**

**Principal activities : Portfolio Management**

#### ESRS S1

**[IRO 4] :** Positive impact of social dialogue on employees (freedom of association). For Sienna, social dialogue represents historical values of the company culture (i.e., acquisition of Malakoff Humanis).

**[IRO 5] :** Positive impact of the various collective agreements on the company's employees. At Sienna, numerous collective agreements have been signed.

**[IRO 8] :** Positive impact linked to attention to training needs identified and/or reported by employees according to their seniority, expertise and career prospects.

**Value chain : Proprietary account**

**Supporting activities : HR**

### Description of material risks and opportunities resulting from materiality assessment

#### ESRS E1

**[IRO 1] :** Financial risk linked to insufficient consideration of physical climate risks on investments, particularly in physical assets (private debt).

**[IRO 3] :** Financial and reputational risk linked to insufficient consideration of transitional climate risks in investment decisions.

**Value chain : Invested companies**

**Principal activities : Conception, Marketing; Portfolio Management; Real Estate Management**

**Supporting activities : ESG research**

## ESRS S1

**[IRO 6] :** Risk of employee retention due to insufficient consideration of ESG issues.

**[IRO 7] :** Opportunity related to the seniority and expertise of Sienna's employee profiles, which represent major assets for ensuring high quality execution of operations and improving overall performance.

**Value chain : Proprietary account**

**Principal activities : Conception, Marketing**

**[IRO 9] :** Opportunity related to gender diversity, cultural diversity and diversity of professional and educational backgrounds in developing Sienna's pan-European activities.

**Value chain : Proprietary account**

**Supporting activities : HR**

**[IRO 10] :** Risk associated with the security and protection of internal data in order to prevent the leakage of sensitive information.

**Value chain : Proprietary account**

**Supporting activities : HR; IT**

## ESRS S4

**[IRO 11] :** Risk of a lack of transparency and/or clarity in investor information (financial and ESG), which could lead to customer dissatisfaction or even sanctions.

**Value chain : Clients and end-users**

**Principal activities : Commercialisation**

**Supporting activities : RCCI**

**[IRO 12] :** Risk of mismatch between ESG products marketed/subscribed and client preferences in this area (labels, Taxonomy, ESG themes, etc.).

**Value chain : Clients and end-users**

**Principal activities : Conception, Marketing; Commercialisation**

**Supporting activities : ESG research; RCCI**

**[IRO 13] :** Risk associated with Sienna's inability to meet the ESG due diligence requirements of its institutional or corporate clients (carbon footprint, responsible purchasing policy, HR - diversity policy, etc.).

**Value chain : Clients and end-users**

**Principal activities : Conception, Marketing; Commercialisation**

**Supporting activities : ESG research**

**[IRO 14] :** Commercial opportunity linked to the proposal of innovative and tailor-made products (e.g. hybrid assets), as well as to the quality of customer service (responsiveness and proposal of dedicated tool/platform).

**[IRO 15] :** Risk of "sustainability washing" (greenwashing, socialwashing and impact washing) at the level of financial products.

**Value chain : Clients and end-users**

**Principal activities : Conception, Marketing; Commercialisation**

## ESRS G1

**[IRO 16] :** Financial, legal and/or reputational risk due to relationships with invested companies that may have controversial ESG practices.

**[IRO 16] :** Risk of non-compliance with Sienna's values and the various ESG codes, policies and processes that govern investments and day-to-day activities (which may materialise as reputational and regulatory risk).

**Value chain : Invested companies**

**Supporting activities : ESG research; RCCI**

**[IRO 17] :** Financial and operational risks related to non-compliance with ethical rules (personal transactions, declarations of gifts and external functions/mandates, fraud, market manipulation, professional misconduct or other laws or regulations in the financial sector, etc.).

**Value chain : Proprietary account**

**Supporting activities : RCCI; HR; IT**

[**IRO 18**] **:** Risk associated with insufficient LCB-FT due diligence.

**Value chain : Proprietary account**

**Supporting activities : RCCI**

[**IRO 19**] **:** Risk related to non-compliance with (i) ESG regulations to which Sienna is subject (SFDR, Art29 LEC, CSRD, PRI, etc.), (ii) supervisory expectations (AMF) and/or (iii) commitments made by Sienna (PRI, SBTi).

**Value chain : Proprietary account**

**Principal activities : Conception, Marketing; Commercialisation; Portfolio Management**

**Supporting activities : ESG research; RCCI**

[**IRO 20**] **:** Financial reporting and disclosure risk under existing and pending regulations, with the risk of material misstatement.

**Value chain : Proprietary account**

**Supporting activities : Purchase and Finance**

[**IRO 21**] **:** Risk relating to the general IT environment (including hardware, network, backup systems, software etc.), the integrity of Sienna's data and IT security (attempts at fraud and hacking).

**Value chain : Proprietary account**

**Supporting activities : IT**

### ESRS sector specific

[**IRO 22**] **:** Opportunity for outperformance due to consideration of ESG criteria in Sienna's activities and investments.

**Value chain : Invested companies**

**Principal activities : Conception, Marketing; Portfolio Management; Real Estate Management**

**Supporting activities : ESG research**

[**IRO 23**] **:** Risk related to the management of ESG data (sourced directly from companies or data providers).

**Value chain : Proprietary account**

**Supporting activities : ESG research**

[**IRO 24**] **:** Financial, legal, and/or reputational risk due to relationships with invested companies that may have negative impacts on the environment, social aspects, and/or governance.

**Value chain : Invested companies**

**Principal activities : Conception, Marketing; Commercialisation; Portfolio Management**

**Supporting activities : ESG research**

[**IRO 25**] **:** Opportunity to advance sustainable finance themes with invested companies (voting and engagement) and with NGOs and public authorities (advocacy).

**Value chain : Invested companies**

**Principal activities : Conception, Marketing; Portfolio Management**

**Supporting activities : ESG research**

## Disclosure of current and anticipated effects of material impacts, risks and opportunities on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

All current and anticipated material impacts were included into our DMA analysis. Plans to tackle those material impacts are on-going and under validation

## Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment

### ESRS E1

**[IRO 2] :** Positive impact via direct financing and loans in the energy transition sector.

Sienna IM's financing and direct loans in the energy transition sector have a positive environmental impact by supporting sustainable projects. Although reputational risk is real and it is impossible to detect everything, these initiatives demonstrate Sienna's commitment to responsible and sustainable practices.

### ESRS S1

**[IRO 4] :** Positive impact of social dialogue on employees (freedom of association). For Sienna, social dialogue represents historical values of the company culture (i.e., acquisition of Malakoff Humanis GA).

Social dialogue at Sienna IM, representing historical corporate culture values, has a positive impact on employees by promoting freedom of association. This commitment is crucial for Sienna's corporate culture and historical values, reinforcing partnerships with entities like Malakoff Humanis and similar initiatives.

**[IRO 5] :** Positive impact of the various collective agreements on the company's employees. At Sienna, numerous collective agreements have been signed.

The various collective agreements signed at Sienna IM have a positive impact on employees by improving their working conditions and ensuring equitable rights. This commitment reflects the importance of legal and corporate culture issues at Sienna, supporting a culture of social dialogue and respect for employee rights.

**[IRO 8] :** Positive impact linked to attention to training needs identified and/or reported by employees according to their seniority, expertise and career prospects.

Sienna IM's attention to the training needs of employees, based on their seniority, expertise, and career prospects, has a positive impact by ensuring a highly qualified workforce with recognized expertise in their respective fields. This proactive approach contributes to managing reputational and legal risks while supporting the professional development of employees.

## Disclosure of how impacts originate from or are connected to strategy and business model

### ESRS E1

**[IRO 2] :** Positive impact via direct financing and loans in the energy transition sector. This positions Sienna as a key player in green project financing, attracting environmentally conscious investors and creating long-term growth opportunities.

### ESRS S1

**[IRO 4] :** Positive impact of social dialogue on employees (freedom of association). For Sienna, social dialogue represents historical values of the company culture (i.e., acquisition of Malakoff Humanis). This fosters a positive and collaborative work environment, increasing employee satisfaction and retention. An engaged and satisfied workforce is essential for maintaining high productivity and attracting quality talent, which is crucial for the company's long-term success.

**[IRO 5] :** Positive impact of the various collective agreements on the company's employees. At Sienna, numerous collective agreements have been signed. This reflects Sienna IM's commitment to fair and responsible labor practices, enhancing the company's reputation and regulatory compliance. A well-treated and motivated workforce contributes to operational stability and financial performance.

**[IRO 8] :** Positive impact linked to attention to training needs identified and/or reported by employees according to their seniority, expertise and career prospects. This allows the company to remain competitive and innovative, adapting to market changes and regulatory requirements. Additionally, it promotes professional growth among employees, leading to better retention and reduced turnover costs.

## Disclosure of reasonably expected time horizons of impacts

For the time horizon factor, the approach is based on the guidance provided in FAQ 9 of the EFRAG IG 1 Materiality Assessment Implementation Guidance. This section 6.4 elucidates the process for assessing the three temporal horizons: short, medium, and long-term.

It is important to note the following definition: The initial definition of short-term is the year of reporting of the sustainability statement, while medium-term is defined as less than 5 years and long-term is defined as more than 5 years.

## Description of nature of activities or business relationships through which undertaking is involved with material impacts

### ESRS E1

**[IRO 2] :** Positive impact via direct financing and loans in the energy transition sector. This positions Sienna as a key player in green project financing, attracting environmentally conscious investors and creating long-term growth opportunities.

This impact stems directly from Sienna's activities in financing and supporting sustainable projects.

**[IRO 4] :** Positive impact of social dialogue on employees (freedom of association). For Sienna, social dialogue represents historical values of the company culture (i.e., acquisition of Malakoff Humanis). This fosters a positive and collaborative work environment, increasing employee satisfaction and retention. An engaged and satisfied workforce is essential for maintaining high productivity and This impact stems from Sienna's internal activities and commitment to fostering a positive corporate culture.

This impact stems from Sienna's internal activities and its commitment to fair labor practices.

**[IRO 5] :** Positive impact of the various collective agreements on the company's employees. At Sienna, numerous collective agreements have been signed. This reflects Sienna IM's commitment to fair and responsible labor practices, enhancing the company's reputation and regulatory compliance. A well-treated and motivated workforce contributes to operational stability and financial performance.

This impact stems from Sienna's internal activities and its commitment to fair labor practices.

**[IRO 8] :** Positive impact linked to attention to training needs identified and/or reported by employees according to their seniority, expertise and career prospects. This allows the company to remain competitive and innovative, adapting to market changes and regulatory requirements. Additionally, it promotes professional growth among employees, leading to better retention and reduced turnover costs.

This impact stems from Sienna's internal activities focused on employee development and training.

## Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows and material risks and opportunities for which there is significant risk of material adjustment within next annual reporting period to carrying amounts of assets and liabilities reported in related financial statements

No current financial effects of material risks and opportunities presents a significant risk of material adjustments within next annual reporting period to carrying amounts of assets and liabilities reported in related financial statements.

## Disclosure of anticipated financial effects of material risks and opportunities on financial position, financial performance and cash flows over short-, medium- and long-term

Use of phase-in provision.

## Information about resilience of strategy and business model regarding capacity to address material impacts and risks and to take advantage of material opportunities

The resilience analysis was conducted through the DMA analysis in 2024. No additional risks were identified at this stage.

## Disclosure of changes to material impacts, risks and opportunities compared to previous reporting period

N/A - Sienna IM's first exercise without any prior disclosure.

## Disclosure of specification of impacts, risks and opportunities that are covered by ESRS Disclosure Requirements as opposed to those covered by additional entity-specific disclosures

The sector specific topics integrate, on a high-level basis, the environmental, social and governance impacts related to investee companies' activities. For this reason, and pending the publication of a dedicated sector specific ESRS, the ESRS E2, E3, E4, S2 and S3 are not considered at a micro scale, but on a broader scale at sector specific IROs level.

IROs linked to Entity-Specific topics

**[IOR 12] :** Risk of mismatch between marketed/subscribed ESG products and client preferences in this regard (labels, Taxonomy, ESG themes, etc.).

**[IRO 13] :** Risk related to Sienna's inability to meet the ESG due diligence requirements of its institutional or corporate clients (carbon footprint, responsible procurement policy, HR policy - diversity, etc.).

[**IRO 16**] **:** Risk related to non-compliance with Sienna's values and various ESG codes, policies, and processes that govern investments and daily activities (which can manifest as reputational and regulatory risk).

[**IRO 19**] **:** Risk related to non-compliance with (i) the ESG regulations to which Sienna is subject (SFDR, Art29 LEC, CSRD, PRI, etc.), (ii) the expectations of supervisors (AMF), (iii) the commitments made by Sienna (PRI, SBTi), and/or (iv) mandate-related

## 7.4.4.1.16 Processes to identify and assess material impacts, risks and opportunities

### Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities

The DMA methodology is based on four main steps including the identification of the sustainability landscape followed by stakeholder engagement, the assessment of impact and financial materiality and the consolidation of the list of ESG topics and material IROs.

Sienna IM has identified and appointed dedicated representatives for each segment of the value chain. These individuals, identified by the ESG team, bring specialist expertise and insights knowledge to their respective roles and activities. Furthermore, these representatives have been actively engaged in a series of evaluation workshops to identify, define, and rate the list of IROs accordingly with the methodology validated upstream. Each IRO was defined and rated at Sienna IM's level, yet the all the expertises (i.e., Sienna Gestion, Sienna Private Credit and Sienna Real Estate) contributed to the evaluation, scoring, and validation of these IROs.

Considering Sienna IM's operations and value chain and subject to completeness and cohesiveness, the development of the long list of ESG topics and related IROs is supported by an in-depth review and analysis of different sources of information mentioned below:

- The list of the sustainability matters covered in topical ESRS in accordance with ESRS 1 AR.16 and GBL's list of IROs is used as starting point. Following its own analysis and review, GBL has added certain sub-topics as entity-specific. Sienna IM did not necessarily consider these sub-topics as such because they had been linked to other topical ESRS.
- A cross check potential ESG matters was performed through the support of a consulting firm with a dedicated expertise in sustainable finance (and thus financial actors). Public disclosures available through annual reports, sustainability reports, ESG institutional communication, corporate websites, industry-specific communication, etc. are supporting this cross-check review.
- The ESRS 1 AR.16 list is completed by specific topics proper to Sienna IM as a responsible investor and company. MSCI's ESG Industry Materiality Map has added further industry-specific topics ("asset management & custody banks" industry map), such as ESG integration, responsible investment and data privacy and security.

### Description of process to identify, assess, prioritise and monitor potential and actual impacts on people and environment, informed by due diligence process

This first step in the DMA supports the definition of the sustainability landscape specific to Sienna IM and its core business, the identification of key affected stakeholders and their relative contribution.

This step supports the investigation of potential material ESG topics to assess in a next phase the potential IROs. Aligned with the statement provided under section 1.3 Scope, a preliminary step consists in proceeding with an analysis of the activities of Sienna IM, its business relationships, and the context.

During this step, the following tasks are performed:

- The analysis of Sienna IM's strategy, financial statements and ESG reporting covering the previous periods;
- A review of the economic activities and their geographic locations;
- A mapping of the business relationships in upstream and/or downstream value chain, including type and nature of business relationships (refer to 3.1.3 Value chain mapping below);
- An understanding of the affected stakeholders and their potential interests;

### Description of how process focuses on specific activities, business relationships, geographies or other factors that give rise to heightened risk of adverse impacts

The DMA was conducted by expertise (at holding levels) rather than by location or region. For all the subsidiaries, the assets and activities are predominantly located in Europe (Sienna Real Estate's activity in South Korea being only acting as a distributor).

Each IRO was defined and rated at Sienna IM's level, yet the all the expertise (i.e., Sienna Gestion, Sienna Private Credit and Sienna Real Estate) contributed to the evaluation, scoring, and validation of these IROs.

According to its own activities and business model, Sienna IM added, deleted, modified and refined the list of sustainability matters and IROs. Entity-specific sustainability matters that have been initially identified by GBL have not necessarily been considered, because they could be reassembled and linked to other topical ESRS. Entity-specific sub-topic such as ESG integration was expanded by the support of a consulting firm with a dedicated expertise in sustainable finance and the MSCI's asset management ESG industry materiality map.

At this stage, a preliminary screening of the ESRS and a pre-proposal list of IROs were carried out and discussed during dedicated workshops with related stakeholders. This corresponds to an expert judgment-based assessment and rating process.

## Description of how process considers impacts with which undertaking is involved through own operations or as result of business relationships

This step "Understanding the sustainability landscape" supports the investigation of potential material ESG topics to assess in a next phase the potential IROs. Aligned with the statement provided under section 1.3 Scope, a preliminary step consists in proceeding with an analysis of the activities of Sienna IM, its business relationships, and the context.

During this step, the following tasks are performed:

- The analysis of Sienna IM's strategy, financial statements and ESG reporting covering the previous periods;
- A review of the economic activities and their geographic locations;
- A mapping of the business relationships in upstream and/or downstream value chain, including type and nature of business relationships (refer to 3.1.3 Value chain mapping below);
- An understanding of the affected stakeholders and their potential interests;

## Description of how process includes consultation with affected stakeholders to understand how they may be impacted and with external experts

In accordance with ESRS 1 §3.1, the stakeholders identified by Sienna IM are spread over the following categories:

- **External stakeholders:** it covers the individuals or groups whose interests are affected or could be affected – positively or negatively – by the Sienna IM's activities and its indirect business relationships across its value chain. Sienna IM has identified its two main external stakeholders: GBL and Malakoff Humanis to be integrated into the DMA process.
- GBL is both the majority shareholder of Sienna IM and a strategic partner in third-party asset management,
- Malakoff Humanis is Sienna IM minority shareholder, delegates mandates and dedicated funds management and has various service agreements related to Sienna IM.
- **Internal stakeholders:** it covers the individuals or groups whose interests are affected or could be affected – positively or negatively – by the Sienna IM's activities and its direct business relationships across its value chain. Internal stakeholders are people involved and/or responsible for managerial, operational and support processes. Each Head of an activity, an expertise or a Direction has been identified to participate in the elaboration of the DMA.

No silent stakeholders were integrated following the interviews conducted, as it was deemed neither pertinent nor proportional.

## Description of how process prioritises negative impacts based on their relative severity and likelihood and positive impacts based on their relative scale, scope and likelihood and determines which sustainability matters are material for reporting purposes

In accordance the Stakeholder engagement process, the list of ESG topics and related IROs is reviewed in order to establish an intermediate list of the ESG topics and IROs that will be used for the impact and financial materiality assessment:

- Each element of the list is subject to an analysis from a relevance perspective taking into account the business considerations covered under the section 3.1 Identification of sustainability landscape (cf. Methodological Protocol) and the related views and interests of the stakeholders involved;
- From a faithful representation and understandability requirement perspective, a particular attention is given to the definition of each ESG topic and IRO;
- Stakeholder engagement strategy supports the validation of the intermediate list with a focus on understanding how Sienna IM may impact and/or may be impacted by a specific ESG topic and related IROs or in assessing the time horizon and the likelihood of sustainability impacts.

In line with EFRAG IG 1 Materiality Assessment implementation guidance, the factors of scope, scale, remediability and likelihood are based on GBL translation for its activities. The assessment of material impacts based on the criteria detailed above is carried out for each sustainability matter identified in the intermediate list:

- A scoring is attributed to each criterion: scale, impact, irremediability and likelihood;
- A calculation is made in application of the appropriate calculation method subject to a) the positive and negative impact combined with b) the potential and actual characteristic of this impact.
- Each impact with a score equal or above eight is considered as a material impact.

## Description of process used to identify, assess, prioritise and monitor risks and opportunities that have or may have financial effects

As for the impact materiality, the purpose of scanning the ESG risks and opportunities exercise is to establish an intermediate list of the ESG topics resulting from the risks and opportunities analysis performed in accordance with the steps described below:

- Impact materiality and financial materiality assessment being interrelated, interdependencies between the two dimensions are initially considered though the identification of the magnitude (financial, regulatory, reputational and business-related effects) of the impacts previously identified;
- Each element is then subject to an analysis from a relevance perspective taking into account the business considerations and the views and perspectives expressed by the different stakeholders involved in the process. A particular attention is also paid to the definition of each risk and opportunities from a faithful representation and understandability requirement perspective;
- Stakeholders engagement supports (i) the assessment, validation and completeness of the list of the material risks and opportunities, and (ii) the evaluation of magnitude (financial, regulatory, reputational and business-related effects) and likelihood of the topics in line with the ESRS criteria;
- The analysis of dependencies and the identification of specific business relationships that contributes to consider additional risks or opportunities is carried out to complete the list. Sienna IM potential dependency on natural, human and/or social resources is assessed based on its business processes and potential specific business relationships;
- ESG topics identified under the intermediate list are classified between risks and opportunities categories.

## Description of how connections of impacts and dependencies with risks and opportunities that may arise from those impacts and dependencies have been considered

Impact materiality and financial materiality assessment being interrelated, interdependencies between the two dimensions are initially considered though the identification of the magnitude (financial, regulatory, reputational and business-related effects) of the impacts previously identified.

## Description of how likelihood, magnitude, and nature of effects of identified risks and opportunities have been assessed

Following these workshops, and based on the specificity of Sienna IM's activities, "Equal of above 1" has been retained as the financial materiality threshold.

The financial materiality assessment based on the criteria detailed above is carried out for each sustainability matter identified in the intermediate list:

- A scoring is attributed to each criteria: magnitude (taking into account legal, reputation, financial and activities criteria) and likelihood;
- A calculation is made in application of the appropriate calculation method subject to the risk or opportunity qualification;
- Each risk and opportunity with a score "Equal of above 1" is considered as financially material.

## Description of how sustainability-related risks relative to other types of risks have been prioritised

Sustainability-related risks relative to other types of risks were not prioritised in 2024.

The Double Materiality Assessment ("DMA") is the process by which Sienna IM determines material information on sustainability impacts, risks and opportunities ("IROs"). This is achieved by the determination of material sustainability matters and material information to be reported under the European Sustainability Reporting Standards ("ESRS"). Thus, the performance of a DMA based on objective criteria is the starting point to sustainability reporting.

The DMA has two interrelated objectives:

1. Informing top management and providing those responsible for the sustainability strategy with the clear vision of sustainability IROs.
2. Ensuring that the sustainability strategy is adapted to the risks identified and assessed.

## Description of decision-making process and related internal control procedures

The Chief Sustainability Officer reports to the Chief Executive Officer and is responsible for overseeing the elaboration of the Double Materiality Assessment and the development of the sustainability strategy. The CSO is also responsible of managing the DMA scoring workshops sessions, submitting the results to the Directors and ensuring the proper achievement of the sustainability strategy and the publication of the annual sustainability statement.

## Description of extent to which and how process to identify, assess and manage impacts and risks is integrated into overall risk management process and used to evaluate overall risk profile and risk management processes

In the process of identifying, assessing and managing impacts, risks and opportunities for Sienna IM, the Chief Sustainability Officer worked closely with the Chief Risk and Compliance Officer (CRCO) and the other main internal stakeholders for the alignment between the Group "Risk Map" and the DMA methodology.

The DMA methodology and related scales have been established following GBL's methodology and the EFRAG's guidance. Thresholds aligned with Sienna IM's business model and based on expert judgment have been assessed and validated by the CRCO and the CSO.

Internal controls are implemented throughout the process via the involvement of workshops' participants (1st level of control) as well as the challenge of results by Sienna IM's Board of Directors.

Sienna IM has appointed PwC in their capacity as statutory auditors of Sienna IM to carry out the assurance services in respect of the Corporate Sustainability Reporting Directive 2022/2464/EU disclosures and the EU Taxonomy disclosures for the year ended 31 December 2024 that will be included in the 2024 Annual Report of GBL.

## Description of extent to which and how process to identify, assess and manage opportunities is integrated into overall management process

Sienna IM has not yet implemented a process to identify, assess, and manage opportunities as part of its overall management process.

## Description of input parameters used in process to identify, assess and manage material impacts, risks and opportunities

The DMA was conducted by expertise (at holding levels) rather than by location or region. For all the subsidiaries, the assets and activities are predominantly located in Europe (Sienna Real Estate's activity in South Korea being only acting as a distributor).

Considering the perimeter of the sustainable reporting obligation given the Sienna IM's activities and core business, the definition of the scope of the DMA ("Scope") follows an approach based on the three following items:

- Sienna IM as responsible company which includes its entities and subsidiaries and the investment management activities. In this perspective, Sienna IM is directly confronted to ESG exposure generating impacts, risks and opportunities linked to its role as an employer and contributor to the environment in which it operates. In the DMA, the associated scope for Sienna as a responsible company is "own operation".
- Sienna IM as responsible investor which includes the portfolio companies within Sienna IM's portfolio. Those companies identify and address their sustainability impacts and associated risks and opportunities within the framework of their own internal controls and governance. In the DMA, the associated scope for Sienna as a responsible investor is "invested companies".

## Description of how process to identify, assess and manage impacts, risks and opportunities has changed compared to prior reporting period

N/A - Sienna IM's first exercise without any prior disclosure.

## 7.4.4.1.17 Disclosure Requirements included in the undertaking's sustainability statement and of the topics that have been omitted as not material

### Disclosure of list of ESRS Disclosure Requirements complied with in preparing sustainability statement following outcome of materiality assessment

#### ESRS E1

- DR E1-1 ; - DR E1-2 ; - DR E1-3 ; - DR E1-4 ; - DR E1-6 ; - DR E1-8 ; - DR E1-9

#### ESRS S1

- DR S1 -1 ; - DR S1-2 ; - DR S1-3 ; - DR S1-4 ; - DR S1-5 ; - DR S1-6 ; - DR S1-8 ; - DR S1-9 ; - DR S1-11 ;- DR S1-12 ; - DR S1-13

#### ESRS S4

- DR S4 -1 ; - DR S4 -2 ; - DR S4 -3 ; - DR S4 -4 ; - DR S4 -5

#### ESRS G1

- DR G1 - 1 ; - DR G1 - 3 ; - DR G1 - 4

### Explanation of negative materiality assessment for ESRS E1 Climate change

N/A

### Explanation of how material information to be disclosed in relation to material impacts, risks and opportunities has been determined

The CSRD defines the frequency of sustainability reporting under the ESRS as annual given that the sustainability statement forms part of the Group's management report. Accordingly, Sienna IM is required to determine at each reporting date its ESG topics and related IROs as well as the material information to be included in the sustainability statement.

However, if the Chief of Sustainability Officer concludes based on appropriate evidence that the outcome of the prior reporting period materiality assessment is still relevant at the reporting date, the preparation of the sustainability statement may use the conclusions previously reached. This may be true if there have been no material changes in Sienna IM's organizational and operational structure and there have been no material changes in the external factors that could generate new or modify existing IROs or that could impact the relevance of a specific disclosure.

The DMA is updated every year and the Protocol is updated accordingly.

Sienna IM has made the connection between material IROs and material information through a series of dedicated workshops. These workshops included participants who are involved in or responsible for managerial, operational, and support processes. They actively participated in the elaboration and update of the DMA, ensuring a comprehensive approach. During these sessions, participants identified, assessed, and validated the completeness of the list of IROs and conducted the materiality assessment on sustainability matters within their areas of responsibility. The Chief of Sustainability Officer attended all the Impact, Risk, and Opportunity identification and scoring workshops, ensuring alignment and thoroughness in the process.

## 7.4.4.1.18 Metrics

### Metrics shall include those defined in ESRS

Sienna IM's metrics include those defined in ESRS, as well as metrics identified on an entity-specific basis, whether taken from other sources or developed by the undertaking itself.

### For each metric, the undertaking shall label and define the metric using meaningful, clear and precise names and descriptions

For each metric, Sienna IM labels and defines the metric using meaningful, clear, and precise names and descriptions.

### For each metric, the undertaking shall when currency is specified as the unit of measure, use the presentation currency of its financial statements

For each metric where currency is specified as the unit of measure, Sienna IM uses the presentation currency of its financial statements.

## 7.4.4.2 Environmental Information: Disclosures pursuant to Article 8 of Regulation (EU) (Taxonomy Regulation)

### 7.4.4.2.1 Quantitative Disclosure (Annex IV)

#### KPI of the Asset Managers

| The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below: | | The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities, with following weights for investments in undertakings per below: | |
|---|---|---|---|
| Turnover-based: | 3.02% | Turnover-based: | 750,935,861 € |
| CapEx—based: | 5.00% | CapEx-based: | 1,243,288,594 € |
| The percentage of assets covered by the KPI relative to total investments (total AuM).<br>Excluding investments in sovereign entities: | | The monetary value of assets covered by the KPI.<br>Excluding investments in sovereign entities: | |
| Coverage ratio: | 79.10% | Coverage: | 24,854,044,969 € |

#### Additional, complementary disclosures: breakdown of denominator of the KPI

| The percentage of derivatives relative to total assets covered by the KPI. | | The value in monetary amounts of derivatives. | |
|---|---|---|---|
| Derivatives: | -0.09% | Derivatives: | -22,438,979 € |
| The proportion of exposures to EU financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/ 34/EU over total assets covered by the KPI: | | Value of exposures to EU financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU: | |
| For non-financial undertakings: | 7.53% | For non-financial undertakings: | 1,871,989,159 € |
| For financial undertakings: | 0.06% | For financial undertakings: | 15,467,943 € |
| The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI: | | Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU: | |
| For non-financial undertakings: | 8.85% | For non-financial undertakings: | 2,200,133,876 € |
| For financial undertakings: | 1.34% | For financial undertakings: | 333,754,779 € |
| The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI: | | Value of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU: | |
| For non-financial undertakings: | 23.59% | For non-financial undertakings: | 5,862,917,916 € |
| For financial undertakings: | 13.80% | For financial undertakings: | 3,430,652,142 € |
| The proportion of exposures to other counterparties and assets over total assets covered by the KPI: | | Value of exposures to other counterparties and assets: | |
| Other counterparties: | 17.32% | Other counterparties: | 4,304,760,644 € |
| The value of all the investments that are funding economic activities that are not taxonomy-eligible relative to the value of total assets covered by the KPI: | | Value of all the investments that are funding economic activities that are not taxonomy-eligible: | |
| Taxonomy non-eligible turnover: | 21.00% | Taxonomy non-eligible turnover: | 5,218,506,972 € |
| The value of all the investments that are funding taxonomy-eligible economic activities, but not taxonomy-aligned relative to the value of total assets covered by the KPI: | | Value of all the investments that are funding Taxonomy-eligible economic activities, but not taxonomy-aligned: | |
| Taxonomy eligible turnover: | 8,31% | Taxonomy eligible turnover: | 2,065,722,322 € |

## Additional, complementary disclosures: breakdown of numerator of the KPI

| The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI: | | Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU: | |
|---|---|---|---|
| For non-financial undertakings: (Turnover-based) | 2.02% | For non-financial undertakings: (Turnover-based) | 501,713,651 € |
| For non-financial undertakings: (Capital expenditures-based) | 3.53% | For non-financial undertakings: (Capital expenditures-based) | 877,441,412 € |
| For financial undertakings: (Turnover-based) | 0.16% | For financial undertakings: (Turnover-based) | 40,259,503 € |
| For financial undertakings: (Capital expenditures-based) | 0.48% | For financial undertakings: (Capital expenditures-based) | 118,860,175 € |
| The proportion of Taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI: | | Value of Taxonomy-aligned exposures to other counterparties and assets: | |
| Turnover-based: | 0.00% | Turnover-based: | 0 € |
| Capital expenditures-based: | 0.00% | Capital expenditures-based: | 0 € |

## Breakdown of the numerator of the KPI per environmental objective

| | | | | |
|---|---|---|---|---|
| (1) Climate change mitigation | Turnover (total) | 3.01% | Turnover - Transitional activities: | 0.02% |
| | | | Turnover - Enabling activities: | 1.16% |
| | CapEx (total) | 4.93% | CapEx - Transitional activities: | 0.13% |
| | | | CapEx - Enabling activities: | 1.81% |
| (2) Climate change adaptation | Turnover (total) | 0.01% | Turnover - Enabling activities: | 0.00% |
| | CapEx (total) | 0.08% | CapEx - Enabling activities: | 0.00% |
| (3) The sustainable use and protection of water and marine resources | Turnover (total) | 0.00% | Turnover - Enabling activities: | 0.00% |
| | CapEx (total) | 0.00% | CapEx - Enabling activities: | 0.00% |
| (4) The transition to a circular economy | Turnover (total) | 0.00% | Turnover - Enabling activities: | 0.00% |
| | CapEx (total) | 0.00% | CapEx - Enabling activities: | 0.00% |
| (5) Pollution prevention and control | Turnover (total) | 0.00% | Turnover - Enabling activities: | 0.00% |
| | CapEx (total) | 0.00% | CapEx - Enabling activities: | 0.00% |
| (6) The protection and restoration of biodiversity and ecosystems | Turnover (total) | 0.00% | Turnover - Enabling activities: | 0.00% |
| | CapEx (total) | 0.00% | CapEx - Enabling activities: | 0.00% |

### 7.4.4.2.2 Qualitative Disclosure (Annex XI)

## Contextual information in support of the quantitative indicators including the scope of assets and activities covered by the KPIs, information on data sources and limitation

For listed asset positions, the taxonomy alignment calculations are based on information collected by Morningstar Sustainalytics. The proportion of the alignment is calculated based on the weight of the total asset for each issuer. Taxonomy eligibility data for the last 4 environmental objectives is not yet available from our supplier Morningstar Sustainalytics therefore we do not report on the related eligibility neither alignment for our investments. Data should be available during 2025 and will be aggregated on positions in the next financial year of this report.

Regarding the Annex XII, a first analysis demonstrates that the exposure of Sienna IM to nuclear and fossil gas related activities is not significant. Given the low significance of these exposures and the inconsistencies present in counterparties' Taxonomy reporting on Annex XII of Delegated Regulation (EU) 2022/1214, a prudent approach was used for FY24 reporting, reporting no exposures to nuclear & fossil gas related activities. We will keep working over the next year on the analysis to improve the quality of data and the completeness of the reporting.

Due to data limitation from Sustainalytics, the dedicated flag to identify EU companies and companies (financials and non-financials) subject to Articles 19a and 29a of Directive 2013/34/EU may report “”No data””. The following assumptions have been considered to process this data: all “”No data”” reported in the EU companies Sustainalytics flag and CSRD/NFRD flag have not been assessed in the dedicated KPIs (EU/non EU, Financial/non-financials not subject/subject to Articles 19a and 29a of Directive 2013/34/EU). Therefore, have not been assessed the following exposures:

- European / Non-European companies: 5,451,916,227€ AUM
- Subject / Not subject to Articles 19a and 29a of Directive 2013/34/EU: 6,856,063,926€ AUM
- Financial / Non-Financial companies: 1,615,084,092€ AUM. In addition, regarding the breakdown of the numerator of the KPI per environmental objective, climate change alignment to unknown objective have been assigned to Climate Change Mitigation in so far as that the main efforts of companies are made towards this objective. Accordingly, exposures to transitional and enabling activities were disclosed under Climate Change Mitigation objective only.

The data used for eligibility and alignment are those reported (not estimated) on the basis of the inventory of our positions as of 31/12/2024, excluding cash, investments in external funds and exposures to central governments, central banks and supranational issuers.

The exposure to other counterparties and assets corresponds to cash, funds of funds and UCITS managed by Ver Capital (included in total AuM of the Private Credit expertise).

The Private Credit expertise follows companies’ progress to identify their Taxonomy alignment self-assessment through its annual ESG data collection campaign.

## Explanations of the nature and objectives of Taxonomy-aligned economic activities and the evolution of the Taxonomy-aligned economic activities over time, starting from the second year of implementation, distinguishing between business-related and methodological and data-related elements

The nature of Taxonomy-aligned economic activities lies in their contribution to the EU’s environmental objectives, particularly in combating climate change and promoting resource efficiency. Our objective is to integrate these activities into our investment strategies and decision-making process, ensuring that our portfolio supports sustainable development while delivering value to our clients.

From a methodological and data perspective, we anticipate a structural evolution in our approach to Taxonomy alignment. As the Taxonomy framework matures, we expect our data providers to expand their coverage of relevant companies, which will enhance our ability to assess alignment systematically. This will allow us to calculate the alignment of our investments more accurately as more companies become subject to the Taxonomy requirements and begin reporting their activities accordingly.

On the business front, we are dedicated to enhancing our ESG approaches and their integration into our investment decision-making processes. We recognize the importance of aligning our investments with the Taxonomy criteria and are actively developing frameworks that incorporate these considerations. This ongoing integration will enable us to identify and prioritize investments that not only meet financial objectives but also contribute positively to environmental sustainability.

## Description of the compliance with Regulation (EU) 2020/852 in the financial undertaking’s business strategy, product design processes and engagement with clients and counterparties

Sienna IM considers that responsible finance has a key role to play in supporting the different players of the economy in the historic transitions that we are facing:

- Digital transition, with the related fractures;
- Demographic transition and its health and training needs;
- Societal transition, notably around gender and inclusion, and
- Ecological transition, centered today on the climate and tomorrow in a broader way on biodiversity.

Sienna IM is convinced that integrating responsible investment targets in our investment process can improve the value of our portfolio by mitigating risks, making companies more resilient and more attractive. Over the long term, it creates value for all stakeholders.

Sienna’s overall approach to responsible investment is systematic ESG integration into the decision-making process, while applying some norm-based and sector exclusions to all funds the various expertise managed. On top of that, Sienna aims to implement robust processes for identifying ESG controversies and potential ESG risks at the preinvestment stage. Furthermore, as part of its ESG integration policy, Sienna requires the implementation of engagement programs and plans by invested or financed assets based on the conclusions of preliminary risk analyses and annual ESG risk reviews. Due to the specificities inherent to each asset class, the purpose and conditions of these engagement plans remain specific to each investment process and are described in the specific documentation for each entity and product. Exercising voting rights is an integral part of the ESG commitment of the various fund managers, and Sienna exercises the voting rights attached to its investments on behalf of its clients. The specific voting policy for each product and dedicated reporting are available on the websites of each regulated entity.

Sienna has made some major responsible investment commitments, such as:

- Some external engagements, non-exhaustive list below:
- PRI signatory since 2015
- All Sienna's ESG commitments are publicly available and can be found online under "List of initiatives joined by Sienna Investment Managers"
- Sienna also commits to systematically consider climate, biodiversity and DE&I topics.

All new products launched by an expertise are classified as Art. 8 or 9 with SFDR, unless specifically requested by the client.

To reinforce its approach to address climate change topic, Sienna IM officially signed up to the Science Based Targets initiative (SBTi) in January 2024. SBTi is a not-for-profit partnership between the United Nations Global Compact, the World Resources Institute, WWF and the Carbon Disclosure Project (CDP) set up to encourage companies to take rapid action by setting targets for reducing GHG emissions. This commitment marks a significant step towards aligning our operations and investments with a global warming scenario of no more than 1.5°C above pre-industrial levels, in line with the objectives of the Paris Agreement. By setting science-based targets to be validated by SBTi in 2025, Sienna IM is committed to reduce its carbon footprint while embedding sustainable practices throughout its organization.

### For credit institutions that are not required to disclose quantitative information for trading exposures, qualitative information on the alignment of trading portfolios with Regulation (EU) 2020/852, including overall composition, trends observed, objectives and policy

not applicable for Sienna

## 7.4.4.2.3 Nuclear and fossil gas related activities (Annex XII)

| Nuclear energy related activities | |
|---|---|
| The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle. | No |
| The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies. | No |
| The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades. | No |
| Fossil gas related activities | |
| The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. | No |
| The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels. | No |
| The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels. | No |

## 7.4.4.3 Environmental Information: Climate change

### 7.4.4.3.1 Integration of climate-related performance in incentive schemes

#### Disclosure of how climate-related considerations are factored into remuneration of members of administrative, management and supervisory bodies

Members of Sienna IM's board of directors don't have any climate-related considerations factored into their remuneration.

Sienna IM's senior management have some climate-related considerations factored into their variable remuneration. A long-term incentive plan was put in place in 2023 and includes the SBTi validated status obtention.

#### Percentage of remuneration recognised that is linked to climate related considerations

*See below*

#### Explanation of climate-related considerations that are factored into remuneration of members of administrative, management and supervisory bodies

Members of Sienna IM's board of directors don't have any climate-related considerations factored into their remuneration.

Sienna IM's senior management have some climate-related considerations factored into their variable remuneration. A long-term incentive plan was put in place in 2023 and includes the SBTi validated status obtention.

The long-term incentive plan, which only concerns top management, is structured as follows:

- 50% linked to individual objectives
- 50% linked to four equi-weighted collective objectives, one of which is to achieve validated SBTi targets and status.

### 7.4.4.3.2 Transition plan for climate change mitigation

#### Disclosure of transition plan for climate change mitigation

Sienna IM has officially published its Group Climate policy and Roadmap, available in our website: https://www.sienna-im.com/wp-content/uploads/2024/12/sienna_im_climate_roadmap_en.pdf.

This roadmap comprehensively addresses the entire group and its specific characteristics. This climate roadmap aims to define our commitment and actions in response to the immediate challenges posed by climate change, but also to pave the way for a longer-term transition to carbon neutrality by 2050 by formalizing our governance, climate path for our operations and investments with associated actions and initiatives, development of investment strategy and climate related financial products.

Furthermore, upon validation of the Science-Based Targets initiative (SBTi) targets, they will be published publicly through SBTi and Sienna IM websites.

#### Explanation of how targets are compatible with limiting of global warming to one and half degrees Celsius in line with Paris Agreement

In 2024, Sienna IM officially committed to the Science Based Targets initiative (SBTi) to set science-based near-term climate targets aligned with 1.5°C global warming limit. By definition, SBTi targets are compatible with the 2015 Paris Agreement as they are scientifically grounded, tailored to sector-specific needs, structured for both immediate and long-term impacts, and foster transparency and collective action—all essential elements for achieving the goal of limiting global warming to 1.5°C.

#### Disclosure of decarbonisation levers and key action

Several decarbonation levers have been identified:

For Scopes 1 and 2:

- Transitioning to company electric vehicles ;
- Following government recommendations on the use of heating and air conditioning ;
- Switching our electricity contracts: subscribe to renewable electricity contracts for all our offices, with priority given to those where the national energy mix is more 'carbon intensive'.

For Scope 3 category 1-14:

- Engaging with our suppliers: request and obtain the carbon footprint of our service providers who have not published or communicated it, in order to minimise the use of estimated data ;
- Implementing a Responsible Procurement policy
- Implementing a Travel policy: application of Sienna IM's travel policy, giving preference to rail travel whenever possible, particularly for short distances.

For Scope 3 - Financed emissions:

- Engaging clients to set targets and net-zero transformation plans ;
- Reallocating within sectors to more efficient companies (such as increasing investments in companies which have set science-based targets) ;
- Reallocating among sectors to lower carbon-intensity sectors ;
- Exclusion policies for companies or projects involved in fossil fuels ;
- Financing climate-solution activities contributing to climate goals (e.g., renewables, green infrastructure, carbon removal,...) ;
- Divesting high-emitting companies.

## Disclosure of significant operational expenditures (Opex) and (or) capital expenditures (Capex) required for implementation of action plan

As our core business is asset management, our climate change mitigation actions focus mainly on our portfolio investments on behalf of third parties, rather than on our own CapEx / OpEx financing. So, in addition to the various indicators implemented for analysing the transition of issuers in our investment universes to ensure this alignment, we report in our Article 29 Loi Energie Climat report the proportion of our eligible listed asset investments aligned with the taxonomy.

No significant OpEx or CapEx is required for the implementation of our climate action plan.

## Financial resources allocated to action plan (OpEx)

24,058.00 EUR

## Financial resources allocated to action plan (CapEx)

0.00 EUR

## Explanation of potential locked-in GHG emissions from key assets and products and of how locked-in GHG emissions may jeopardise achievement of GHG emission reduction targets and drive transition risk

Sienna IM has no significant locked-in Greenhouse Gas emissions from key assets or products. As an asset management company, our business model primarily focuses on investment management, which inherently results in a lower direct carbon footprint compared to industries with significant physical assets.

However, as part of our annual carbon footprint assessment enabling us to analyze our operational GHG emissions comprehensively, we can identify key areas for improvement and define appropriate actions to effectively reduce our carbon footprint.

## Explanation of any objective or plans (CapEx, CapEx plans, OpEx) for aligning economic activities (revenues, CapEx, OpEx) with criteria established in Commission Delegated Regulation 2021/2139

As an asset management company, our main activity is to manage third party investments rather than directly engage CapEx or OpEx. However, we recognize the importance of aligning our investments with the criteria established in Commission Delegated Regulation 2021/2139. Moreover, the EU Taxonomy alignment of our investments and more generally our ESG investment approach are reported in our annual Loi Energie Climat 29 reports.

## Significant CapEx for coal-related economic activities

0.00 EUR

## Significant CapEx for oil-related economic activities

0.00 EUR

## Significant CapEx for gas-related economic activities

0.00 EUR

## Undertaking is excluded from EU Paris-aligned Benchmarks

The entirety of Sienna IM's revenue is derived from investment activities. Therefore, Sienna IM's operations are not excluded from the EU Paris-aligned Benchmarks.

## Explanation of how transition plan is embedded in and aligned with overall business strategy and financial planning

The transition plan is a fundamental component of our Group strategy, ensuring that our long-term goals are met while addressing the pressing challenges of sustainability and climate change.

This plan has been presented multiple times to both the Board of Directors and the Management Committee, receiving their approval and endorsement. This rigorous process underscores our commitment to integrating the transition plan into the core of our business operations and governance.

Furthermore, our transition plan is materialized through our SBTi commitment, which lays out a trajectory of mid-term transformation actions across all areas of expertise and teams. This includes our data, reporting, investment, risk management, finance and ESG teams, ensuring a holistic approach to sustainability.

Sienna IM is convinced that integrating responsible investment targets in our investment process can improve the value of our portfolio by mitigating risks, making companies more resilient and more attractive. Over the long term, it creates value for all stakeholders. That's why Sienna IM's activities systematically integrate environmental, social and governance criteria into the investment processes.

Sienna has made some major responsible investment commitments, such as: - Sienna has some external engagements, non-exhaustive list below: o PRI signatory since 2015 o All Sienna's ESG commitments can be found here: https://www.sienna-im.com/wp-content/uploads/2023/05/sienna-im_list-ofinitiatives_2023_final_en.pdf - - Sienna also commits to systematically address climate, biodiversity and DE&I topics as soon as sustainability is mentioned. All new products launched by an expertise are classified as Art. 8 or 9 with SFDR, unless specifically requested by the client.

Moreover, To reinforce our approach to address climate change topic, in January 2024 Sienna IM officially signed up to the Science Based Targets initiative (SBTi), a not-for-profit partnership between the United Nations Global Compact, the World Resources Institute, WWF and the Carbon Disclosure Project (CDP), set up to encourage companies to take rapid action to help the climate by setting targets for reducing GHG emissions. This commitment marks a significant step towards aligning our operations and investments with a global warming scenario of no more than 1.5°C above pre-industrial levels, in line with the objectives of the Accords de Paris. By setting science-based targets to be validated by SBTi in 2025, we are committed to reducing our carbon footprint while embedding sustainable practices throughout our organization.

## Transition plan is approved by administrative, management and supervisory bodies

The transition plan was co-developed by the employees and validated by the management (through the Management Committee) and the Board of Directors.

## Explanation of progress in implementing transition plan

In 2024, significant progress in implementing Sienna IM's transition plan has been made, notably through the following actions:

- Calculation of a part of the emissions financed ;
- Temperature related-data acquisition and calculation of the listed portfolio temperature rating ;
- Official commitment to SBTi in January 2024 and submission of our targets for official validation 9 months later ;
- Formalize a Group Climate policy and roadmap

## Date of adoption of transition plan for undertakings not having adopted transition plan yet

N/A - transition plan adopted

## High-level explanation of how it will adjust its strategy and business model to ensure compatibility with the transition

Sienna IM has officially published its Group Climate policy and Roadmap, available in our website: https://www.sienna-im.com/wp-content/uploads/2024/12/sienna_im_climate_roadmap_en.pdf.

This roadmap comprehensively addresses the entire group and its specific characteristics. This climate roadmap aims to define our commitment and actions in response to the immediate challenges posed by climate change, but also to pave the way for a longer-term transition to carbon neutrality by 2050 by formalizing our governance, climate path for our operations and investments with associated actions and initiatives, development of investment strategy and climate related financial products.

Furthermore, upon validation of the Science-Based Targets initiative (SBTi) targets, they will be published publicly through SBTi and Sienna IM websites.

## 7.4.4.3.3 Material impacts, risks and opportunities and their interaction with strategy and business model

### Type of climate-related risk

Investing in all sectors (with the exception of those subject to the Group Exclusion policy), Sienna IM is concerned by both physical and transition risks weighing on its investee companies. And Sienna IM has a risk related to portfolios not adapted to the challenges posed by climate-change and exposed to physical and transition risks.

Physical risks correspond to direct losses associated with damage caused by climatic hazards to economic players (extreme temperatures, floods, forest fires, etc). they can be acute or chronic. Physical risks have not yet been precisely quantified as they are integrated within our systematic ESG analysis.

Transition risks cover the economic consequences of implementing a low-carbon economic model (regulatory and legal risks, market risks and reputational risks). Transition risks have not yet been precisely quantified as they are integrated within our systematic ESG analysis.

### Description of scope of resilience analysis

Sienna IM did not conduct any formal resilience analysis in 2024.

Sienna IM expertises are fully convinced there is a strong negative correlation between extra-financial risks and the financial or economic value of an issuer. For this reason, Sienna IM places the reduction of extra-financial risks at the heart of its responsible investment strategy, as stated in the group ESG policy.

The expertises have put in place a system and an organisation that enables the entire management teams to take into account the risks associated with ESG issues. In addition to the management teams, each expertise has a team dedicated to compliance, internal control and risk, which is independent of the operating units. Each director is a member of the Management Board. This team regularly carries out due diligence to verify the reliability of the ESG process and compliance with the investment constraints applicable to ESG funds, including those relating to ESG controversies. This team is also responsible for validating all the structuring documents formalised on the ESG approaches (ESG policy, procedures, reports, etc.).

Furthermore, Sienna IM Group is committed with SBTi, and waiting for the validated status. During the SBTi process, some resilience aspects were taken into account in the decision-making process to go with a international recognised framework, helping to set objectives to tackle the climate challenges.

### Disclosure of how resilience analysis has been conducted

The ESG dedicated team in charge of the SBTi submission file met the Management Committee 5 times in 2024, before submitting it in September 2024. During these various meetings, the ESG team carried out a “non-formal” resilience analysis focusing on the 1.5°C climate scenario to evaluate the necessary adjustments and resources required. This scenario is integral to our SBTi near-term target setting, which aims to ensure that our strategies are consistent with global climate goals.

This analysis involved:

1. Scenario Selection: we specifically used the 1.5°C climate scenario (SBTi framework) to assess potential impacts and necessary adaptations in our operations and investments.
2. Resource Identification: the analysis focused on identifying the additional resources needed to support our climate transition efforts, both in terms of human and financial resources
3. Integration into investment decision making process: we ensure as part of this analysis that climate risks and opportunities are (will be more) systematically considered to ensure an effective alignment with our SBTi targets.

### Date of resilience analysis

2024

### Time horizons applied for resilience analysis

As we officially submitted to SBTi for validation our near-term targets, the time horizons used for this resilience analysis is 10 years (2033) with an official intermediary objective in 5 years.

### Description of results of resilience analysis

As of 2024, we have not conducted an official resilience analysis.

However, our 2024 carbon footprint assessment has highlighted key areas for GHG emissions improvement, which we are actively addressing.

Moreover, our SBTi commitment is central to our sustainability strategy. This commitment not only aligns our goals with 1.5°C global climate targets but also enhances our resilience by guiding our investment decisions toward more sustainable practices and issuers already aligned or committed to aligning to a 1.5 °C pathway. By focusing on emissions reduction and transition, we are positioning our portfolio to better withstand potential regulatory changes and market shifts related to climate risks.

Sienna IM is also convinced that implementing an ambitious climate strategy focusing on aligning our operations and investments with the low-carbon transition is essential for mitigating climate risks and enhancing our resilience and competitiveness. By establishing clear targets, we can not only comply with increasingly stringent global regulations but also position ourselves as leaders in sustainability, effectively meeting the expectations of clients and stakeholders. This alignment between our carbon strategy and overall business strategy will empower us to identify and capitalize on investment opportunities in a zero-carbon economy while avoiding stranded assets. Ultimately, fostering an agile mindset and embracing change management will be crucial as we prepare Sienna for a future that prioritizes sustainability and innovation.

### Description of ability to adjust or adapt strategy and business model to climate change

Because Sienna IM is fully aware of climate change huge challenges, Sienna IM has decided in 2023 to join SBTi and submitted its validation file in September 2024. Thanks to this commitment, Sienna IM is embracing a net zero trajectory by 2040, with medium-term intermediate targets (5 years). Sienna IM climate policy is detailing our strategy and business model adaptation with dedicated parts on governance, decarbonation strategy and actions implemented.

As an asset management firm, we recognize the critical importance of adapting our strategy and business model to address the challenges posed by climate change. Our approach involves the continuous development of innovative investment strategies that align with sustainable practices. We have introduced thematic funds focused on areas such as green bonds, low carbon investments, and climate transition. These initiatives not only reflect our commitment to environmental stewardship but also position us to capitalize on emerging opportunities in a rapidly changing market. By integrating climate considerations into our investment framework, we aim to deliver long-term value to our clients while contributing positively to the global effort against climate change.

## 7.4.4.3.4 Description of the processes to identify and assess material climate-related impacts, risks and opportunities

### Description of process in relation to impacts on climate change

Our process for identifying and assessing climate-related impacts, risks, and opportunities is comprehensive and multi-faceted. We conduct an annual carbon footprint assessment to evaluate the emissions associated with our own operations, allowing us to identify areas for improvement and track our progress toward sustainability goals.

Additionally, we integrate ESG criteria into our investment processes. This integration ensures that we consider climate-related risks and opportunities at every stage of our investment decision-making, enabling us to make informed choices that align with our sustainability objectives.

To further enhance our understanding of climate-related risks, we employ a specific approach to assess the reliability of issuers' transition plans. This involves analyzing their strategies for reducing carbon emissions, evaluating their commitments to sustainability, and monitoring their progress against established targets. By rigorously assessing these factors, we can identify investment opportunities that are not only resilient to climate risks but also contribute positively to the transition towards a low-carbon economy.

### Description of process in relation to climate-related physical risks in own operations and along value chain

While we have not conducted a formal analysis of climate-related physical risks across our operations, we actively use various public information platforms to assess potential risks such as https://www.georisques.gouv.fr/ for our France office whose data is provided by the French Ministry for Ecological Transition, Biodiversity, Forestry, the Sea and Fisheries and BRGM. BRGM is the French public establishment for the application of earth sciences. These data provide the most reliable data to date to identify and assess the level of physical risks. Our findings indicate that, aside from our Amsterdam office, which is exposed to flood risks, our other locations do not face material physical risks at this time.

No specific climate-related scenario has been used as part of this analysis.

We remain committed to monitoring and evaluating climate-related risks as part of our ongoing risk management process. This includes staying informed about any developments that may affect our operations or value chain, ensuring that we are prepared to address any emerging risks in the future.

### Description of process in relation to climate-related transition risks and opportunities in own operations and along value chain

In our commitment to addressing climate-related transition risks and opportunities, we have conducted a thorough assessment of our own operations and along the value chain.

Our carbon footprint assessment has provided valuable insights into our GHG emissions across our operations and value chain.

In addressing climate-related transition risks and opportunities, we have established a comprehensive process to identify it that includes the following key components:

- Carbon Footprint Analysis: We conduct a thorough carbon footprint analysis. This analysis allows us to quantify our greenhouse gas emissions across our operations and value chain, providing a clear picture of our current impact by Sienna IM expertise.
- Identification of Significant variation vs previous period: Through our analysis, we identify significant discrepancies in emissions across various categories and by Sienna IM expertise. This granular approach enables us to pinpoint specific operations or activities that contribute disproportionately to our overall carbon footprint.
- Benchmarking Against Peers: We perform benchmarking exercises against similar Asset Management firms to understand our position relative to industry standards. This comparative analysis helps us identify best practices and areas for improvement, ensuring that we remain competitive while advancing our sustainability goals.
- KPI Monitoring: To track our progress, we implement key performance indicators (KPIs) focused on carbon intensity. This allows us to monitor our emissions over time, assess the effectiveness of our reduction strategies, and make informed decisions based on our performance metrics.
- Best Practice Benchmarking: In addition to peer benchmarking, we also research and analyze best practices within the industry. This ongoing evaluation of leading approaches to carbon management informs our strategies and helps us adopt innovative solutions to reduce emissions.
- Recommendations from an external Carbon Engineer: The carbon engineer, responsible for overseeing our carbon footprint assessment, provides tailored recommendations for emission reductions. These expert insights guide our initiatives and ensure that we implement effective measures to lower our carbon footprint and enhance our overall sustainability performance.

Based on this assessment, we have implemented several key actions to mitigate our exposure to transition risks. These actions include:

- Renewable Energy Contract Subscription: By committing to renewable energy sources, we are reducing our reliance on fossil fuels, thereby minimizing regulatory and market risks associated with carbon pricing and energy transition.
- Electrification of Company Vehicles: Transitioning our fleet to electric vehicles reduces our operational emissions and positions us favorably in a market increasingly focused on sustainable transportation solutions.
- Travel Policy: Our revised travel policy encourages sustainable travel practices, further reducing our carbon footprint and aligning with stakeholder expectations for responsible corporate behavior.
- Sustainable Procurement Policy: By prioritizing suppliers that adhere to sustainable practices, we are enhancing the resilience of our supply chain while also supporting the wider transition to a low-carbon economy.

These proactive measures not only help us reduce our transition risks but also create significant opportunities for our firm. By aligning our operations with sustainability goals, we enhance our reputation, attract environmentally conscious clients, and position ourselves to capitalize on emerging market trends. Ultimately, these actions contribute to our long-term resilience and support our commitment to a sustainable future

## Explanation of how climate-related scenario analysis has been used to inform identification and assessment of physical risks over short, medium and long-term

Sienna IM did not conduct any formal resilience analysis in 2024.

Sienna IM expertise are fully convinced there is a strong negative correlation between extra-financial risks and the financial or economic value of an issuer. For this reason, Sienna IM places the reduction of extra-financial risks at the heart of its responsible investment strategy, as stated in the Group ESG policy.

Through our double materiality assessment, we identified and assessed two key material risks related to climate change over the long term:

1. Financial and reputational risk associated with insufficient consideration of transition climate risks.
2. Financial risk related to insufficient consideration of physical climate risks.

To manage and mitigate these risks, we have established comprehensive ESG policies that guide our investment decisions and engagement with issuers. These policies ensure that we actively address and incorporate climate-related considerations into our investment processes.

## Explanation of how climate-related scenario analysis has been used to inform identification and assessment of transition risks and opportunities over short, medium and long-term

As part of our commitment to the SBTi, we have defined near-term targets aligned with the 1.5°C pathway by 2040, which we recognize as a long-term scenario. This alignment reflects our proactive approach to identifying and assessing transition risks and opportunities.

In the short term, we focus on achieving our near-term targets, which serve as critical milestones in our journey toward net-zero emissions. By implementing strategies that address immediate climate-related challenges, we can effectively manage risks associated with regulatory changes and market dynamics while positioning ourselves to capitalize on emerging sustainable opportunities.

As we progress toward our near-term targets, our ambition is to maintain momentum and continue our efforts towards a comprehensive net-zero journey. This entails ongoing scenario analysis to evaluate the implications of various climate pathways, ensuring that our investment strategies remain resilient and aligned with our long-term goals.

## Climate-related hazards have been identified over short-, medium- and long-term time horizons

As part of our ESG integration within the investment process and our ESG risk rating methodology, we systematically identify material ESG issues for each issuer. Our ESG risk rating service providers evaluate and incorporate these material issues into the overall ESG risk rating. This includes the assessment of physical risks.

We recognize that climate-related hazards can manifest over short-, medium-, and long-term horizons, and we ensure that these risks are integrated into our ESG ratings. This approach allows us to address potential challenges such as asset stranding or devaluation due to physical or transition risks.

Our ESG Risk rating service provider are designed to help investors identify and understand financially material ESG risks at the security and portfolio levels, and how they might affect the long-term performance for equity and fixed income investments.

## Undertaking has screened whether assets and business activities may be exposed to climate-related hazards

No formal screening of climate-related hazards on our assets and business activities has been performed even though they are considered in our investment process through our ESG integration and ESG risk rating methodology.

## Short-, medium- and long-term time horizons have been defined

Sienna IM has defined the time horizons based on guidelines provided by Science Based Targets initiative (SBTi) and the associated scientist community.

Therefore, the SBTi defines the following time horizons for setting targets:

- **Near-term Targets:**
  Date Range: Typically set for the years 2025 to 2030.
- **Mid-term Targets:**
  Date Range: Generally set for the years 2030 to 2035.
- **Long-term Targets:**
  Date Range: Typically set for the year 2050 or earlier.

The initial definition of short-term is the year of reporting of the sustainability statement, while medium-term is defined as less than 5 years and long-term is defined as more than 5 years.

## Extent to which assets and business activities may be exposed and are sensitive to identified climate-related hazards has been assessed

The likelihood, magnitude and duration of the hazards as well as the geospatial coordinates have not been assessed. However, we plan to perform a formal physical risk analysis in 2025 for both our assets and business activities.

## Identification of climate-related hazards and assessment of exposure and sensitivity are informed by high emissions climate scenarios

Sienna IM has not yet conducted a formal analysis of climate-related hazards or identified specific risks associated with them. However, we plan to undertake this assessment next year in 2025. In our approach, we intend to utilize the recommended methodologies, focusing on high emissions climate scenarios, particularly SSP5-8.5, to inform our understanding of exposure and sensitivity to climate-related hazards.

## Transition events have been identified over short-, medium- and long-term time horizons

Our commitment to the Science Based Targets initiative (SBTi) reflects a vision that extends through 2033, which encompasses a ten-year timeframe. This period covers both our short- and medium-term objectives.

Throughout multiple internal meetings involving top management and climate and ESG experts, we have engaged in comprehensive discussions regarding our strategic vision and the associated transition events. These deliberations have led to a thorough analysis of the transition events identified for our organization. Based on this collaborative effort, we are confident that the identified transition events are complete and adequately address the necessary actions and milestones for our sustainability journey.

These events include:

Reputation: Understanding that as consumer preferences shift towards sustainability, businesses that fail to adapt may face reputational risks.

Market: Recognizing that changing customer behavior will drive demand for low-carbon products and services, creating both risks and opportunities.

Reporting: Anticipating enhanced regulatory requirements for emissions reporting and the need for transparency in sustainability practices.

## Undertaking has screened whether assets and business activities may be exposed to transition events

Prior to our official commitment to the SBTi, we conducted several impact analyses to screen our assets and business activities for exposure to transition events. These analyses were particularly focused on our strategic positioning in the market and considered various factors, including policy and legal changes, market dynamics, and reputational risks associated with the transition to a low-carbon economy.

By evaluating these potential transition events, we gained valuable insights into how our investments might be affected and identified areas where we could enhance our resilience.

## Extent to which assets and business activities may be exposed and are sensitive to identified transition events has been assessed

Sienna IM has conducted a comprehensive analysis focusing on three key transition events: Reputation, Market, and Reporting. Each of these events has been assessed through a systematic approach that includes the following steps:

1. Identification of Transition Events: We have identified specific transition events that could impact our business operations and asset performance:
   - Reputation: Increased stakeholder concern regarding sustainability and climate-related issues, and the reputational risk of not achieving our SBTi near-term targets.
   - Market: Changing customer behavior driven by a growing demand for sustainable products and services.
   - Reporting: Enhanced emissions reporting obligations and regulations affecting existing products and services.
2. Impact Analysis:
   - Reputation: We assessed how increased stakeholder concern regarding sustainability and climate-related issues could affect our brand reputation. This involved analyzing market research data and industry trends to determine potential reputational risks and opportunities.
   - Market: We evaluated the impact of changing customer behavior on our product offerings and market positioning by being one of the fewest asset managers committing to SBTi. This included examining customer feedbacks and competitor strategies to identify potential vulnerabilities and areas for growth in response to evolving market demands.
   - Reporting: We analyzed the implications of enhanced emissions reporting obligations and regulations on our business operations. This involved reviewing current reporting frameworks, compliance requirements, and potential costs associated with increased transparency, accountability and potential additional data requirements.
3. Sensitivity Assessment:

We conducted a sensitivity analysis to determine how different levels of exposure to each transition event could affect our assets and business activities by engaging

key internal stakeholders, including our ESG team and top management, to gather insights.

## Identification of transition events and assessment of exposure has been informed by climate-related scenario analysis

As part of our commitment to the Science Based Targets initiative (SBTi) to establish near-term targets aligned with the objectives of the Paris Agreement, we utilized insights from the 1.5°C scenario and the SBTi framework to identify key transition events that could significantly impact our business.

To effectively leverage the climate scenario in our analysis, we undertook the following steps:

- Scenario Framework: We adopted the SBTi's prescribed 1.5°C scenario, which provided a structured approach for understanding potential future climate conditions and their implications for our operations.
- Engagement with Management: We conducted a series of at least eight meetings with our Management Committee to discuss the findings of the scenario analysis. These discussions facilitated a deeper understanding of the strategic implications of the identified transition events. These sessions brought together cross-functional teams, including climate and ESG experts, to analyze the scenario insights and assess their relevance to our business model.
- Comprehensive Assessment: Through these collaborative efforts, we critically evaluated the potential transition events, considering both the risks and opportunities that may arise as we move towards our climate targets.

By integrating the SBTi scenario analysis into our strategic planning process, we have ensured that our identification of transition events is robust, informed, and aligned with our long-term sustainability objectives.

## Assets and business activities that are incompatible with or need significant efforts to be compatible with transition to climate-neutral economy have been identified

Sienna IM considers almost all of its activities to be compatible with the transition to a climate-neutral economy. This perspective is formalized in our SBTi targets, which encompass both our own operations (Scope 1 and 2 emissions) and our financed emissions, the latter of which represent the most significant part of our business activities.

Through our SBTi targets, we are actively working to ensure that our operations align with the necessary pathways for achieving a climate-neutral economy. By focusing on reducing our own emissions and influencing our financed emissions, we are committed to facilitating a transition that supports sustainable development and resilience against climate-related risks.

### Explanation of how climate scenarios used are compatible with critical climate-related assumptions made in financial statements

While our financial statements do not include specific climate-related assumptions, we recognize the critical importance of aligning our operations and investments with a net-zero pathway. We are acutely aware that this alignment is essential to ensuring the long-term sustainability and resilience of our company and its financial performance.

By integrating climate scenarios into our strategic planning, we are proactively addressing potential risks and opportunities associated with climate change.

## 7.4.4.3.5 Policies to manage its material impacts, risks and opportunities related to climate change mitigation and adaptation

### Policies in place

Several policies have been implemented or improved in recent years to ensure a proper management of our material impacts, risks and opportunities related to climate change mitigation and adaptation such as:

- **Climate roadmap**

  A strategic framework outlining our approach to addressing climate-related challenges and opportunities. This climate roadmap aims to define our commitment and actions in response to the immediate challenges posed by climate change, but also to pave the way for a longer-term transition to carbon neutrality by 2050 by formalizing our governance, climate path for our operations and investments with associated actions and initiatives, development of investment strategy and climate related financial products.
  Sienna IM has officially published its Group Climate policy and Roadmap, available in our website: https://www.sienna-im.com/wp-content/uploads/2024/12/sienna_im_climate_roadmap_en.pdf.
  The Chief Sustainability Officer is accountable of this policy.

- **Responsible Purchasing Policy**

  Sienna Investment Managers implements actions regarding its suppliers that impact the upstream value chain. Through the "Responsible Purchasing Charter," Sienna mandates all suppliers to engage in continuous improvement regarding environmental protection, particularly in climate-related areas such as energy consumption reduction and greenhouse gas emissions in line with the Paris Agreement. The main principles of this responsible procurement policy are:

  - Reuse and Recycling: encourage the reuse of materials and equipment where possible and appropriate
  - End of life cycle assessment: assess whether the maintenance or repair of existing assets is a viable option compared to the purchase of new equipment
  - Environmentally-friendly products: give preference to the purchase of products and materials that are environmentally and energy-friendly, as well as those that meet recognized sustainability standards
  - Working with our suppliers: work with our suppliers to promote sustainable business practices

  The policy also details our supplier selection criteria such as the availability of the supplier's carbon footprint on scope 1, 2 and 3.
  This policy is available for all Sienna IM's employees, and the ESG correspondent network is accountable of its application.

- **Travel Policy**

  Guidelines aimed at minimizing the environmental impact of business travel and promoting sustainable practices at group level. One of the main principle of this policy is to prioritise rail travel over air travel wherever possible for all journeys that can be made in 3 hours.
  This policy is available for all Sienna IM's employees, and the Head of HR is accountable of its application.
  Establishing a collaborative framework for analyzing private asset investments with a focus on sustainability.
  Commitment to Science-Based Targets Initiative (SBTi)
  Preparing for commitment to SBTi throughout the year, including training all employees on climate issues and the implications of an SBTi commitment. This initiative led to validation by the Sienna IM Board of Directors in December 2023, with an official commitment to SBTi announced with "committed" status in January 2024.
  Other policies are available and disclosed in the entity specific disclosures.

### Description of key contents of policy

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Description of scope of policy or of its exclusions

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Description of most senior level in organisation that is accountable for implementation of policy

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Disclosure of third-party standards or initiatives that are respected through implementation of policy

N/A - Sienna IM has not engaged any third-party standards or initiatives in the implementation of their policies.

## Description of consideration given to interests of key stakeholders in setting policy

N/A - This is not relevant for Sienna IM's policies because the interests of key stakeholders were not considered in setting the policy.

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

N/A - This is not relevant for Sienna IM's policies because the policy is not made available to potentially affected stakeholders, nor to stakeholders who need to help implement it.

## Sustainability matters addressed by policy for climate change

The Sienna IM's policies address the following sustainability matters:

a) **climate change mitigation ;**

- our ESG policy provides key guiding principles in terms of ESG criteria integration into the investment decision-making process. This involves the evaluation of companies in our portfolio based on their carbon footprint, sustainability practices, and overall impact on climate change indirectly materialised through a ESG risk scoring, thereby directing capital toward more sustainable businesses.
- our Exclusion policy provides for a gradual phase-out of fossil fuels, reinforcing our commitment to fighting climate change and aligning ourselves with the objectives of the Paris Agreement.
- our Climate roadmap clearly formalizes that Sienna IM is engaged in developing investment strategies and financial products that meet the specific needs of our clients while contributing to the transition towards a sustainable economy. This approach allows us to offer a diverse range of funds tailored to climate challenges, with for instance some of them directly addressing climate: green bonds fund, climate transition fund, low carbon fund, and also dedicated team to energy transition projects financing.

These policies aim to integrate environmental considerations into our activities, to limit any negative impact within our perimeter, and to act as a responsible investor by taking account of environmental, social and governance (ESG) criteria in our investment processes.

b) **climate change adaptation**

- the Climate roadmap lists the main climate initiatives in which we are involved such as Climate Action 100+, Carbon Disclosure Project (CDP), Avoided Emissions initiatives, and others. This document also formalizes that Sienna promotes a responsible and long-term mindset throughout the financial industry and is focused on external commitments.

It also formalizes our commitment to start a formal resilience analysis in 2025, in order to enhance our understanding of climate issues and refine our investment strategy accordingly. This resilience analysis will cover both our physical risks, such as extreme weather events and their impacts on our assets, as well as our transition risks, which include regulatory developments, market changes, and societal expectations regarding sustainability. By conducting this thorough assessment, we will be able to develop concrete actions to anticipate future challenges and capitalize on emerging opportunities.

Energy efficiency and renewable energy deployment are covered in our climate roadmap.

## Disclosure of reasons for not having adopted policies

N/A

## 7.4.4.3.6 Actions and Resources related to climate change mitigation and adaptation

### Actions and resources in place

Our organization is committed to addressing climate change through a series of strategic actions and resource allocations. Key initiatives include:

- **Carbon Footprint Assessment**

  Sienna IM has conducted a carbon footprint assessment for the second consecutive year at the Group level. This ongoing evaluation enables us to track our emissions and identify areas for improvement.

- **Calculation of Financed Emissions**

  As part of our sustainability efforts, we have calculated a portion of our financed emissions. This assessment helps us understand the climate impact of our investments and guide future decisions.

- **Temperature Data Acquisition**

  We have invested in temperature data to measure our portfolio trajectory. This data is essential for aligning our investments with climate targets and understanding potential risks associated with climate change.

- **Commitment to Science-Based Targets Initiative (SBTi) and submission of our targets**

  We have submitted a comprehensive file to the SBTi, demonstrating our commitment to setting science-based targets for reducing greenhouse gas emissions in line with global climate goals.

- **Development of a Climate Policy**

  We are in the process of developing a Climate policy that will outline our strategic approach to mitigating climate risks and enhancing sustainability across our operations.

- **Creation of a Climate Analyst Position**

  To strengthen our focus on climate-related issues, we have established a dedicated position for climate analysis within our listed asset management expertise. This role will enhance our capacity to assess and manage climate risks effectively.

- **Establishment of Dedicated Committees**

  We have organized several committees focused on defining and implementing our SBTi commitment. These committees are instrumental in developing actionable strategies and ensuring accountability in our climate initiatives.

### Disclosure of key action

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

### Description of scope of key action

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

### Time horizon under which key action is to be completed

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

### Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

### Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

It is the first exercise of Sienna IM, hence, there are no prior periods.

## Disclosure of the type of current and future financial and other resources allocated to the action plan

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex. As of to date, only not significant – 24k€ of Temperature data per year is required to implement the defined actions.

## Current financial resources allocated to action plan (Capex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

## Current financial resources allocated to action plan (Opex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

## Future financial resources allocated to action plan (Capex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

## Future financial resources allocated to action plan (Opex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

## Reasons for not having adopted actions

N/A

## Decarbonisation lever type

Based on decarbonation levers identified, in 2024 we continued to implement and apply the following actions aimed at effectively reducing our emissions:

### For Scopes 1 and 2:

- Transitioning to company electric vehicles ;
- Following government recommendations on the use of heating and air conditioning ;
- Switching our electricity contracts: subscribe to renewable electricity contracts for all our offices, with priority given to those where the national energy mix is more ‘carbon intensive’.

### For Scope 3 category 1-14:

- Engaging with our suppliers: request and obtain the carbon footprint of our service providers who have not published or communicated it, in order to minimise the use of estimated data ;
- Provide awareness communication regarding the Travel policy and responsible procurement policy to ensure correct application

### For Scope 3 - Financed emissions:

- Sienna IM listed assets expertise joined Climate Action 100+ initiative in March 2024. Investors who join this initiative are responsible for direct engagements with target companies, either individually and/or collaboratively, with the aim of ensuring that the largest GHG emitting companies in the world take the necessary actions to combat climate change. In this capacity, Sienna’s listed assets expertise is a participating investor for engagement with Air Liquide
- In January 2024 Sienna IM officially signed up to the Science Based Targets initiative (SBTi), a not-for-profit partnership between the United Nations Global Compact, the World Resources Institute, WWF and the Carbon Disclosure Project (CDP), set up to encourage companies to take rapid action to help the climate by setting targets for reducing GHG emissions. Within this framework, we have defined and formalised ambitious targets for reducing our emissions which are currently being reviewed and validated by SBTi.
- Transition analysis framework for our investment has been defined and implemented enabling the investment teams to ensure our alignment with our targets, in addition to setting up and monitoring portfolio temperature data.

## Achieved GHG emission reductions

0.00 t $CO_2e$

## Expected GHG emission reductions

Scopes 1 and 2

Sienna Investment Managers commits to reduce absolute scope 1 and 2 GHG emissions 54.6% by 2033 from a 2023 base year.

Scope 3 - Category 15 Financed emissions

Different GHG emissions reduction targets have been defined as part of our SBTi commitment depending asset classes concerned.

- For listed assets: Sienna Investment Managers commits to align 42% of its scope 1 + 2 portfolio temperature score by invested value within the listed equity, corporate bond and money market portfolio from 2.33°C in 2023 to 2.03°C by 2029.

Temperature rating indicator is a forward-looking indicator based on company's  future emissions projected under its long-term business plan and therefore should reflect ghg emission reductions of issuers in our portfolios.

- For private debt investments: using relevant indicators reflecting company's  activity and emissions, Sienna Investment Managers commits to apply Sectoral Decarbonization Approach associated to its private debt investments in emissive sectors (aviation, building, transport, cement).

### Explanation of extent to which ability to implement action depends on availability and allocation of resources

The implementation of our action plan doesn't exhibit significant dependencies on the availability and allocation of resources. Our action plan is already well-defined and actively being executed, with strong support from top management. This support ensures that we have the necessary commitment and direction to move forward effectively.

### Explanation of relationship of significant CapEx and OpEx required to implement actions taken or planned to relevant line items or notes in financial statements

The implementation of our climate change mitigation actions does not require significant CapEx or OpEx, as for our financed emissions which represent the main part of our emissions, actions primarily focus on investment strategy and allocation rather than extensive capital or operational expenditures.

Regarding our operational activities (Scopes 1 & 2), the primary lever for decarbonization involves transitioning our electricity contracts from a standard to a renewable energy contracts. This switch does not necessitate substantial CapEx or OpEx, as it primarily involves modifications to our existing contracts rather than physical infrastructure investments.

In summary, our climate change initiatives are integrated into our investment strategies and operational adjustments, minimizing the need for significant capital or operational expenditures.

### Explanation of relationship of significant CapEx and OpEx required to implement actions taken or planned to key performance indicators required under Commission Delegated Regulation (EU) 2021/2178

In the absence of official guidelines one the applicability of these KPIs for financial institutions, this disclosure is considered not applicable.

## 7.4.4.3.7 Targets related to climate change mitigation and adaptation

### Targets in place

Sienna Investment Managers is currently in the process of defining an efficient monitoring framework for our official SBTi targets with relevant indicators established for each scope and category concerned.

This framework is designed to provide us with clear visibility into our progress and performance, allowing us to track our objectives effectively.

Sienna Investment Managers will carry out an annual assessment of its carbon footprint on scopes 1 and 2 in order to measure progress in terms of reducing its emissions and to adapt the actions implemented if necessary.

Our emissions will be reported annually on our website, as is already the case. They will also be reported in our sustainability report, which has been introduced this year.

As for the actions we have taken in terms of emissions financed to achieve our targets, they will be presented in a very macro way in our annual sustainability reports, but also in the annual reports of our funds, which will detail the ESG processes implemented that may be accompanied by certain KPIs such as the temperature rating score for our listed asset classes and the current state of sectors emissions to follow the SDAs pathway for our private debt classes.

## Relationship with policy objectives

Our targets are closely aligned with our climate roadmap/policy, which outlines our governance structure, commitment to GHG emissions reduction, and specific actions to achieve emissions reductions across all scopes. The governance framework includes a dedicated sustainability committee that oversees the implementation of our climate strategies, ensuring accountability and transparency. Our SBTi targets are specific and measurable, focusing on reducing Scope 1, Scope 2, and Scope 3 financed emissions. To support these efforts, we leverage tools and data such as carbon footprint assessment, sustainability reporting, Temperature Rating and GHG emissions dataset, and partnerships with CDP and others international climate initiatives, all aimed at fostering a culture of sustainability and driving continuous improvement in our climate performance.

## Measurable target

Several GHG emissions reduction targets have been set to manage material climate related impacts, risks and opportunities by ensuring alignment with Paris agreement objectives. These targets have been formalized as part of our official SBTi targets submissions:

### Scopes 1 & 2

Sienna is committed to reducing absolute greenhouse gas (GHG) emissions from Scope 1 and 2 by 54.6% by 2033 compared to the reference year 2023. This target has been set following an absolute contraction approach compatible with a +1.5°C scenario.

### Scope 3 - Category 15

**Listed Assets:**

Sienna Investment Managers is committed to aligning 42% of the temperature score of its Scope 1 + 2 portfolio by value invested within the portfolio of listed equities, corporate bonds, and the money market from 2.33°C in 2023 to 2.03°C by 2029.

Sienna Investment Managers is also committed to aligning 42% of the temperature score of its Scope 1 + 2 + 3 portfolio by value invested within the portfolio of listed equities, corporate bonds, and the money market from 2.52°C in 2023 to 2.16°C by 2029.

**Private Debt:**

Sienna has set targets for 2033 for each carbon-intensive sectors based on 2023 data.

- Cement: Sienna IM is committed to reducing GHG emissions from cement in its private debt portfolio by 27.5% per $tCO_2e/t$ by 2033, using 2023 as the reference year.
- Land Transport: Sienna Investment Managers is committed to reducing greenhouse gas emissions from land transport within its private debt portfolio by 39.06% per $gCO_2e/tkm$ by 2033 compared to the reference year 2023.
- Aviation: Sienna IM is committed to reducing greenhouse gas emissions from aviation within its private debt portfolio by 35% per $gCO_2e/RTK$ by 2033 compared to the reference year 2023.
- Buildings: Sienna IM is committed to reducing greenhouse gas emissions from buildings in its private debt portfolio by 69.1% per $kgCO_2e/m^2$ by 2033 compared to the reference year 2023.
- Energy: Sienna IM is committed to continuing to finance only renewable electricity until 2033.

## Description of scope of target

Scope 1 and 2 combined target: 100% of scope 1 and 2 is covered by the target.

Scope 3 category 15 financed emissions: scope of the targets in terms of activity is defined in ID E1.MDR-T_01-13. Additionally, our targets do not cover mandates and dedicated funds.

## Baseline value and year

For all defined targets, the base year is 2023.

Scope 1 & 2 baseline value: 72 $tCO_2e$

Scope 3 cat.15 financed emissions baseline values:

- Listed assets: scope 1 & 2 portfolio at 2.33°C and scope 1,2 &3 portfolio at 2.52°C
- Private debt:

Aviation portfolio is 3430g $CO_2e/RTK$

Cement portfolio is 0,674 $CO_2e/t$

Land transport portfolio is 159,92 $gCO_2e/TKM$

Building portfolio is 21,8 $kgCO_2e/m2$

## When disclosing the progress in meeting these targets made before its current base year the undertaking shall provide a brief explanation for these differences

This is not applicable for Sienna Investment Managers, as we have not disclosed progress in meeting targets made before 2023, which is our only baseline year.

## GHG emission reduction targets shall at least include target values for the year 2030

Sienna Investment Managers has established GHG emission reduction targets in alignment with the Science Based Targets initiative (SBTi) framework. Therefore, our targets for Scope 1 and Scope 2 emissions cover ten years from the date they are submitted for official validation to the SBTi. Specifically, we commit to reducing absolute Scope 1 and 2 GHG emissions by 54.6% by 2033.

In addition, our targets for financed emissions have been defined with a 10-year horizon, incorporating an intermediate objective for 2029. This approach allows us to track our progress effectively and make necessary adjustments to ensure we meet our near-term climate commitments.

As part of our SBTi commitment and defined targets, we didn't formalized target values for the year 2030 and 2050, but for the year 2029 and 2033.

## Period to which target applies

All our targets encompass a 10-year period from 2023 to 2033, with a specific milestone for our listed assets targets in 5 years (2029).

## The undertaking shall present the information over the target period with reference to a sector-specific, if available, or a cross-sector emission pathway compatible with limiting global warming to 1.5°C

All our targets have been defined based on the SBTi framework, ensuring that they are considered 'science-based' and aligned with the latest climate science necessary to meet the goals of the Paris Agreement, specifically limiting global warming to 1.5°C above pre-industrial levels, signifying that the information over the target period will be the same.

## Description of methodologies and significant assumptions used to define target

Our GHG emission reduction targets have been strictly defined using the Science Based Targets initiative (SBTi) framework and methodology. This framework ensures that our targets are grounded in scientific evidence and aligned with the goal of limiting global warming to 1.5°C.

Regarding our own operations, the GHG protocol is the methodology used for our carbon footprint assessment.

Regarding our financed emissions targets and specifically the listed assets activity, the Temperature Rating indicator developed by CDP and WWF approved by SBTi has been used to define our targets and monitor it overtime.

Sectoral Decarbonization Approach framework and tools provided by SBTi have been used to defined our private debt targets for each sector concerned.

## Target related to environmental matters is based on conclusive scientific evidence

Our targets related to environmental matters have been defined using the Science Based Targets initiative (SBTi) framework, which is grounded in conclusive scientific evidence, including scientific observations, expert committee recommendations, and established trajectories.

## Disclosure of how stakeholders have been involved in target setting

While no external stakeholders have been directly involved in the target setting process, we have engaged external service providers in the preliminary stages, who have contributed to our carbon footprint assessment and financed emission calculations for private debt investments.

## Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data

There have been no changes to the methodology, limitations, or underlying measurement processes within the defined time horizon.

## Description of performance against disclosed target

The definition of our targets and implementation of some reduction actions took place in 2024, meaning that performance against our disclosed targets will be observable starting in 2025. However, there has been an increase in our Scope 1 and 2 emissions in 2024 compared to 2023 (base year), mainly due to the relocation of our French and Dutch teams to new offices, but this increase will not impact our ability to achieve our targets by 2033. Additionally, we have established a robust governance framework to ensure effective monitoring and alignment with our targets. Operationally, for our listed assets, we report and monitor our global trajectory on a monthly basis to ensure alignment with our objectives.

Our targets are not intended to be revised as required by the SBTi unless there is a significant change in scope. This approach ensures that we maintain stability in our target framework while remaining responsive to any substantial developments that may impact our sustainability commitments

## The undertaking shall specify the share of the target related to each respective GHG emission Scope

- Scope 1: 100%
- Scope 2: 100%
- Scope 3: 39%

## Disclosure of how GHG emissions reduction targets and (or) any other targets have been set to manage material climate-related impacts, risks and opportunities

Several GHG emissions reduction targets have been set to manage material climate related impacts, risks and opportunities by ensuring alignment with Paris agreement objectives. These targets have been formalized as part of our official SBTi targets submissions:

- **Scopes 1 & 2**

  Furthermore, we have defined a short-term target for absolute emissions from Scope 1 + 2. Specifically, Sienna is committed to reducing absolute greenhouse gas (GHG) emissions from Scope 1 and 2 by 54.6% by 2033 compared to the reference year 2023. This target has been set following an absolute contraction approach compatible with a +1.5°C scenario.

- **Scope 3 - Category 15**

  **Listed Assets:**
  Sienna Investment Managers is committed to aligning 42% of the temperature score of its Scope 1 + 2 portfolio by value invested within the portfolio of listed equities, corporate bonds, and the money market from 2.33°C in 2023 to 2.03°C by 2029.
  Sienna Investment Managers is also committed to aligning 42% of the temperature score of its Scope 1 + 2 + 3 portfolio by value invested within the portfolio of listed equities, corporate bonds, and the money market from 2.52°C in 2023 to 2.16°C by 2029.

  **Private Debt:**
  Sienna has set targets for 2033 for each carbon-intensive sectors based on 2023 data.

  - Cement: Sienna IM is committed to reducing GHG emissions from cement in its private debt portfolio by 27.5% per $tCO_2e/t$ by 2033, using 2023 as the reference year.
  - Land Transport: Sienna Investment Managers is committed to reducing greenhouse gas emissions from land transport within its private debt portfolio by 39.06% per $gCO_2e/tkm$ by 2033 compared to the reference year 2023.
  - Aviation: Sienna IM is committed to reducing greenhouse gas emissions from aviation within its private debt portfolio by 35% per $gCO_2e/RTK$ by 2033 compared to the reference year 2023.
  - Buildings: Sienna IM is committed to reducing greenhouse gas emissions from buildings in its private debt portfolio by 69.1% per $kgCO_2e/m^2$ by 2033 compared to the reference year 2023.
  - Energy: Sienna IM is committed to continuing to finance only renewable electricity until 2033.

## GHG emissions

GHG emissions information are reported in the table below.

No variation can be presented as the base year chosen for our target definition is 2023.

Note that as part of our SBTi commitment:

- A combined target for Scopes 1 & 2 has been defined;
- no official target has been set for Scope 3 - category 1 to 14;

| | 2025 | 2033 | (2050) | Annual % target / Base year |
|---|---|---|---|---|
| **Scope 1 GHG emissions** | | | | |
| Gross Scope 1 GHG emissions ($tCO_2eq$) | | 19.7 | | -54.6% |
| **Scope 2 GHG emissions** | | | | |
| Gross location-based Scope 2 GHG emissions ($tCO_2eq$) | | | | 0% |
| Gross market-based Scope 2 GHG emissions ($tCO_2eq$) | | 13.0 | | -54.6% |

## Explanation of how consistency of GHG emission reduction targets with GHG inventory boundaries has been ensured

To ensure the consistency of our greenhouse gas (GHG) emission reduction targets with our GHG inventory boundaries, we have taken a comprehensive and rigorous approach.

For our operational GHG emissions, we engaged a recognized third-party provider to perform our carbon footprint assessment, utilizing the GHG Protocol. This methodology is widely acknowledged for its robustness and credibility, allowing us to define our targets based on a full coverage of our operational emissions. By adhering to this established framework, we ensure that our targets accurately reflect our actual emissions and are aligned with best practices in emissions accounting.

Our approach ensures that we accurately reflect the emissions associated with our operations, particularly in relation to any acquisitions or divestitures that occur during the reporting period. To this end, we adopt a prorata temporis approach when integrating new entities into our emissions inventory. This means that we will account for the GHG emissions of newly acquired entities, such as Vercapital, from the date of acquisition until the end of the reporting period. For instance, Vercapital, which joined Sienna IM at the end of 2024, will be included in our emissions calculations starting from that date, allowing us to present a more accurate representation of our total emissions.

Conversely, for entities that cease to be part of our group, such as the venture capital and private equity expertise that have exited at the beginning of the second semester of 2024, we ensured that their emissions have been excluded from our inventory after their departure date. This approach allows us to maintain the integrity of our GHG emissions reporting by reflecting only those emissions that are relevant to our current operational structure.

For our financed emissions, dedicated funds and mandates are out of scope of the targets as well as the private debt low emissive sector for which no targets has been defined.

Moreover, to ensure the consistency and accuracy of our emissions inventory, the third-party provider engaged to assess our carbon footprint also conduct a rigorous review and validation process for our carbon footprint assessment. Each carbon footprint undergoes a comprehensive review by a second engineer who is not involved in the initial calculation. This reviewer thoroughly examines all underlying data, assumptions, boundaries and emission factors. They perform recalculations for the main emission categories, verifying the integrity of the formulas and the appropriateness of the chosen emission factors. Furthermore, the overall results and the categorization of emissions are compared to similar carbon footprints conducted by Carbometrix or published and verified by our carbon engineers, providing an additional layer of validation.

Regarding our investments/financed emissions, we have adopted the Science Based Targets initiative (SBTi) framework, which is recognized as a stringent and ambitious standard for setting targets. This framework provides clear guidance on defining portfolio target boundaries distinguishing mandatory, optional and out of scope activities.

## Description of how it has been ensured that baseline value is representative in terms of activities covered and influences from external factors

To ensure that our baseline value is representative, we have selected the year 2023 as it accurately reflects our operational activities and conditions that are expected to persist in the upcoming years. This year serves as a reliable reference point for Scopes 1 and Scope 2 emissions, as it encompasses a comprehensive view of our organizational structure, including the number of employees, office space, and other relevant operational factors.

In 2023, our workforce and office footprint are stable and indicative of our ongoing operational capacity. By establishing our baseline in this context, we can confidently assert that it captures the full scope of our emissions-generating activities without significant fluctuations that might arise from external factors.

Regarding investments/financed emissions, the Science Based Targets initiative (SBTi) framework has been used to define our portfolio target boundaries. This framework distinguishes between mandatory and optional activities/ asset classes to include in the scope, mainly based on the level of influence we expect to have / can generally observe for each asset class or activity.

By adhering to this structured approach, we have at least included all mandatory activities in our targets, ensuring that our baseline encompasses the essential elements of our investment portfolio. Additionally, we have thoughtfully incorporated optional activities where we believe we have sufficient influence to drive GHG emissions reduction. This dual approach allows us to capture a comprehensive view of our financed emissions while remaining realistic about our capacity to impact various asset classes.

The use of the SBTi framework not only strengthens the credibility of our baseline but also aligns our targets with best practices in emissions accounting. This ensures that our commitment to GHG reduction is both ambitious and grounded in a thorough understanding of our investment activities.

## Description of how new baseline value affects new target, its achievement and presentation of progress over time

No change has been made to our baseline values, which ensures that there is no impact on our target achievements or the presentation of our progress overtime.

## GHG emission reduction target is science based and compatible with limiting global warming to one and half degrees Celsius

Our GHG emission reduction targets have been defined using the Science Based Targets initiative (SBTi) framework. This framework ensures that our targets are grounded in scientific evidence and aligned with the goal of limiting global warming to 1.5°C. By committing to the SBTi , we have defined targets (being reviewed by SBTi) that reflect the necessary level of emissions reductions required to contribute effectively to global climate goals.

## Description of expected decarbonisation levers and their overall quantitative contributions to achieve GHG emission reduction target

Sienna Investment Managers has identified several decarbonisation levers on its different GHG emissions scope:

### Scopes 1 & 2

As we defined a combined Scopes 1&2 absolute reduction target of 54.6% by 2033 from a 2023 base year, we expect that the decarbonisation levers listed below contribute to at least a reduction of 39t $CO_2e$ by 2033 on our scopes 1 & 2:

- Transition to company electric vehicles
- Follow government recommendations on the use of heating and air conditioning
- Switch our electricity contracts: subscribe to renewable electricity contracts for all our offices, with priority given to those where the national energy mix is more 'carbon intensive'.

### Scope 3 - Category 1 - 14

Although good practices will be implemented for these emission categories, no reduction target has been set so no emission reduction is expected.

### Scope 3 - Category 15 Financed emissions

GHG emissions reduction are expected in the next few years on financed emissions as we defined SBTi targets.

Main decarbonisation levers are :

- Engaging clients to set targets and net-zero transformation plans
- Reallocating within sectors to more efficient companies (such as increasing investments in companies which have set science-based targets)
- Reallocating among sectors to lower carbon-intensity sectors
- Exclusion policies for companies or projects involved in fossil fuels
- Financing climate-solution activities contributing to climate goals (e.g., renewables, green infrastructure, carbon removal,...)
- Divesting high-emitting companies

Emissions reduction expected are those defined in the Sectoral Decarbonization Approach for some private debt investments, and indirectly measure through Temperature rating data (reflection issuers transition plan) for listed assets investments to reach 2.16°C by 2029 (from 2.52°C in 2023).

## The undertaking shall explain by reference to its climate change mitigation actions, the decarbonisation levers and their estimated quantitative contributions

We have estimated emission reductions for certain actions in Scope 1 and Scope 2.

Specifically, for Scope 1, switching all our company vehicles to electric is expected to reduce the associated emissions by almost 100%.

While for Scope 2, if we t switch all our electricity contracts to renewable ones, we can anticipate a reduction of -approximately 90% in the associated emissions as we operate in several European countries with high carbon intensity electricity.

However, we have not been able to measure or estimate the emission reductions that could be generated by the other actions defined, particularly for investments.

## The undertaking shall explain whether it plans to adopt new technologies

Our organization has established a comprehensive strategy for achieving our greenhouse gas (GHG) emission reduction targets. While our defined emissions reduction actions primarily do not depend on the adoption of new technologies, we recognize that innovative solutions can play a pivotal role in the broader context of decarbonizing the economy.

Specifically, our commitment to transitioning to electric company vehicles may involve the adoption of new technologies. This transition aligns with our goal of reducing emissions from our fleet and enhancing operational efficiency.

Moreover, as part of our financing activities, we firmly believe that new technologies are essential levers for driving significant progress towards climate goals. We are dedicated to strengthening our support for climate-solution initiatives, which include financing for renewable energy projects, green infrastructure development, carbon removal technologies, etc. By investing in these areas, we aim to facilitate the transition to a low-carbon economy and support the achievement of our GHG emission reduction targets.

## Diverse range of climate scenarios have been considered to detect relevant environmental, societal, technology, market and policy-related developments and determine decarbonisation levers

By aligning our reduction targets with the Science Based Targets initiative (SBTi) framework, we can ensure compatibility with the goal of limiting global warming to 1.5°C.

This alignment enables us to identify effective strategies and decarbonisation levers, such as transitioning to renewable energy, enhancing energy efficiency, and promoting sustainable practices and responsible investments.

### 7.4.4.3.8 Gross Scopes 1, 2, 3 and Total GHG emissions

| | Retrospective | | | | Milestones and target years | | | |
|---|---|---|---|---|---|---|---|---|
| | Base year | Comparative | N | % N / N-1 | % N / N-1 | 2025 | 2033 | Annual % target / Base year |
| **Scope 1 GHG emissions** | | | | | | | | |
| Gross Scope 1 GHG emissions ($tCO_2eq$) | 43.3 | | 62.5 | 44% | | | 19.7 | 54.6% |
| Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%) | - | | - | | | | | |
| **Scope 2 GHG emissions** | | | | | | | | |
| Gross location-based Scope 2 GHG emissions ($tCO_2eq$) | 40.10 | | 50.40 | 26% | | | | 0% |
| Gross market-based Scope 2 GHG emissions ($tCO_2eq$) | 28.70 | | 38.00 | 32% | | 13.0 | | -54.6% |
| **Significant scope 3 GHG emissions** | | | | | | | | |
| Total Gross indirect (scope 3) GHG emissions ($tCO_2eq$) | 4,807,567.30 | | 8,675,953.58 | 80% | | | | |
| 1 Purchased goods and services | 2,868.00 | | 3,596.00 | 25% | | | | |
| [Optional sub-cattegory: Cloud computing and data centre] | | | | | | | | |
| 2 Capital goods | 18.70 | | 82.90 | 343% | | | | |
| 3 Fuel and energy-related activities (not included in scope 1 or scope 2) | 20.40 | | 24.70 | 21% | | | | |
| 4 Upstream transportation and distribution | - | | - | | | | | |

| | Retrospective | | | Milestones and target years |
|---|---|---|---|---|
| 5 Waste generated in operations | 8.10 | 8.10 | 0% | |
| 6 Business traveling | 162.00 | 135.00 | -17% | |
| 7 Employee commuting | 56.60 | 60.20 | 6% | |
| 8 Upstream leased assets | - | - | | |
| 9 Downstream transportation | - | - | | |
| 10 Processing of sold products | - | - | | |
| 11 Use of sold products | - | - | | |
| 12 End of life treatment of sold products | - | | | |
| 13 Downstream leased assets | - | - | | |
| 14 Franchises | - | - | | |
| 15 Investments | 4,804,433.50 | 8,672,046.68 | 81% | |
| **TOTAL GHG Emissions** | | | | |
| TOTAL GHG Emissions (location-based) ($tCO_2eq$) | 4,807,650.70 | 8,676,066.48 | 80% | |
| TOTAL GHG Emissions (market-based) ($tCO_2eq$) | 4,807,639.30 | 8,676,054.08 | 80% | |

## Disclosure of significant changes in definition of what constitutes reporting undertaking and its value chain and explanation of their effect on year-to-year comparability of reported GHG emissions

No significant impact on the year-to-year GHG emissions data due to changes in our inventory boundaries has been identified.

Even though our scope evolved during the year with the sale of two entities and the integration of a new one, the impact analysis in terms of GHG emissions that we carried out allowed us to conclude that these are very limited and not significant.

## Disclosure of methodologies, significant assumptions and emissions factors used to calculate or measure GHG emissions

GHG protocol methodology using emissions factors from ADEME has been used to measure our GHG emissions on scope 1, 2 and 3 from category 1 to 14. For more accurate results, $CO_2e$ emissions calculations are based on physical data whenever possible: as such, estimations made based on monetary data are indicated in the final reports. The main sources of emission factors used in this report include the ecoinvent database, ADEME's Base Carbone®, ADEME's Base Impacts®, BEIS/DEFRA, Electricity Maps, EFDB database used by the GIEC. Moreover, all emission factors used for the calculation of our carbon footprint are reported in the appendix of our annual carbon footprint report.

No GHG has been excluded from the analysis.

Regarding financed emissions:

- for listed assets, GHG emissions inventory has been calculated using our Principal Adverse Impact data provider (Sustainalytics). This dataset has been created specifically to ensure compliance with the SFDR, with methodologies and calculations designed to match the regulation. It ensures 95% coverage across all corporate indicators and updated quarterly for carbon data. The coverage universe for the carbon emissions data products is approximately 14,000 companies. This includes 3,000 companies that report on their carbon emissions and 11,000 where Sustainalytics relies on their estimation models due to the lack of corporate reporting. The number of reported data points varies year-on-year but is likely to continue increasing gradually.
- for private debt assets, GHG emissions data are collected directly from issuers or estimated using alternative data (economic activity data, financial information, enterprise value,…) and proxies (sector, localisation, number of employees,…) consistent with PCAF methodology and requirements.

## Disclosure of the effects of significant events and changes in circumstances (relevant to its GHG emissions) that occur between the reporting dates of the entities in its value chain and the date of the undertaking's general purpose financial statements

Companies in which we invest may have varying reporting periods (financial and carbon), which can lead to challenges in accurately calculating financed emissions, often based on previous year data. This reliance on past data, as it may not reflect current emissions practices and can affect decision-making. To address these issues, we are committed to using the same methodology for calculating financed emissions each year, ensuring consistency and comparability in our reporting, allowing us to track progress effectively and make informed decisions regarding our sustainability efforts.

### Biogenic emissions of $CO_2$ from the combustion or bio-degradation of biomass not included in Scope 1 GHG emissions

Sienna Investment Managers is not concerned by biogenic emissions of $CO_2$ from the combustion or bio-degradation of biomass.

### Biogenic emissions of $CO_2$ from combustion or bio-degradation of biomass not included in Scope 2 GHG emissions

Sienna Investment Managers is not concerned by biogenic emissions of $CO_2$ from the combustion or bio-degradation of biomass.

### Biogenic emissions of $CO_2$ from combustion or bio-degradation of biomass that occur in value chain not included in Scope 3 GHG emissions

0.00 t $CO_2e$

### Percentage of contractual instruments, Scope 2 GHG emissions

5.88 %

### Disclosure of types of contractual instruments, Scope 2 GHG emissions

- Green electricity, 100% renewable for Germany office
- Regional grid average for other offices

### Percentage of contractual instruments used for sales and purchase of energy bundled with attributes about energy generation in relation to Scope 2 GHG emissions

100.00 %

### Percentage of contractual instruments used for sales and purchase of unbundled energy attribute claims in relation to Scope 2 GHG emissions

0.00 %

### Disclosure of types of contractual instruments used for sales and purchase of energy bundled with attributes about energy generation or for unbundled energy attribute claims

Location based and market based methods are applied to calculate our scope 2 GHG emissions. One of our offices has a renewable energy electricity contract. As part of our SBTi commitment and associated target to reach an emission reduction of 56% by 2033 on our scopes 1 and 2, we plan to switch all our energy contracts to renewable ones.

### Percentage of GHG Scope 3 calculated using primary data

0.00 %

### Disclosure of why Scope 3 GHG emissions category has been excluded

No Scope 3 GHG emissions category is excluded.

### List of Scope 3 GHG emissions categories included in inventory

- 1 Purchased goods and services
- 2 Capital goods
- 3 Fuel and energy related activities
- 4 Upstream transportation and distribution
- 5 Waste generated in operations
- 6 Business travel
- 7 Employee commuting
- 8 Upstream leased assets
- Other indirect emissions upstream
- 9 Downstream transportation and distribution
- 10 Processing of sold products

- 11 Use of sold products
- 12 End of life treatment of sold products
- 13 Downstream leased assets
- 14 Franchise
- 15 Investments
- Other indirect emissions downstream

## Disclosure of reporting boundaries considered and calculation methods for estimating Scope 3 GHG emissions

Operational control approach has been used for the calculation the 2024 Sienna IM's carbon footprint assessment. Our carbon footprint has been calculated by a recognized third party provider applying the following methodology:

The first step is to set the boundaries of the carbon footprint. This includes the definition of a reference period, usually in line with the company's fiscal year, and the delimitation of the organizational boundaries: regional or global, subsidiaries, franchises, etc.

Once the information is collected, the data's consistency is verified by our carbon engineers. It is then used to compute the carbon footprint (scopes 1, 2, and 3 , according to the GHG Protocol Corporate Accounting and Reporting Standard. For more accurate results, $CO_2e$ emissions calculations are based on physical data whenever possible: as such, estimations made based on monetary data are indicated in the final reports.

The main sources of emission factors and tools used in this report include the ecoinvent database, ADEME's Base Carbone®, ADEME's Base Impacts®, BEIS/DEFRA, as well as the third party provider's internal R&D.

Regarding financed emissions, they are calculated based on our end of year (31/12/N) inventory positions excluding cash, investments in external funds and sovereigns.

A dedicated process is applied for private debt positions for which we rely on the actual data provided by borrowers through the ESG questionnaire. This includes the ESG Due Diligence questionnaire for new financings or the questionnaire related to the annual ESG data collection campaign. This asset class is mainly composed by unlisted companies which, in most cases, only provide limited information on their GHG emissions or their carbon footprint reduction trajectories. Due to their size, many of them are not yet subject to CSRD obligations, which explains the lack of carbon data. Thus, when actual data is not accessible, information such as revenue and the NACE code of portfolio companies are transmitted to the external service provider in charge of the calculation of our private debt financed emission and have a internal estimation method.

## If it is material for the undertaking's Scope 3 emissions, it shall disclose the GHG emissions from purchased cloud computing and data center services

In accordance with the requirements for disclosing Scope 3 emissions, we have conducted a thorough assessment of our emissions sources. We have determined that the category of GHG emissions from purchased cloud computing and data center services is not material for our organization.

Given the nature of our activities and operations, the emissions associated with this subset fall within a negligible range and do not significantly impact our overall Scope 3 emissions profile. Therefore, we will not be disclosing these specific emissions in our reporting.

## GHG emissions intensity, location-based (total GHG emissions per net revenue)

0.073 $tCO_2e$/€

## GHG emissions intensity, market-based (total GHG emissions per net revenue)

0.073 $tCO_2e$/€

## Disclosure of reconciliation to financial statements of net revenue used for calculation of GHG emissions intensity

The net revenue amount used for calculation of GHG emissions intensity is provided by the Group Chief Financial Officer from consolidated accounts. This net revenue amount is also reconciled with the one reported in the audited GBL's financial statement annual report available in their website.

## Net revenue

118,210,273.14 EUR

## Net revenue used to calculate GHG intensity

118,210,273.14 EUR

### Net revenue other than used to calculate GHG intensity

118,210,273.14 EUR

## 7.4.4.3.9 Metrics

### Methodologies and significant assumptions behind the metric

The GHG emission intensity ratio is calculated dividing the total GHG emissions (scope 1, 2, 3) in tonnes of $CO_2$ by the net revenue expressed in EUR.

### Metric is validated by an external body other than the assurance provider

The targets described by Sienna IM within the framework of this ESRS fully meet these requirements.

### Label and define the metric using meaningful, clear and precise names and descriptions

The targets described by Sienna IM within the framework of this ESRS fully meet these requirements.

### When currency is specified as the unit of measure, use the presentation currency of its financial statements

The targets described by Sienna IM within the framework of this ESRS fully meet these requirements.

## 7.4.4.3.10 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

### Assets at material physical risk before considering climate change adaptation actions

Sienna IM use phase-in provision and commit to comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of our sustainability statement, if it is impracticable to prepare quantitative disclosures.

### Assets at acute material physical risk before considering climate change adaptation actions

Sienna IM use phase-in provision and commit to comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of our sustainability statement, if it is impracticable to prepare quantitative disclosures.

### Assets at chronic material physical risk before considering climate change adaptation actions

Sienna IM use phase-in provision and commit to comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of our sustainability statement, if it is impracticable to prepare quantitative disclosures.

### Percentage of assets at material physical risk before considering climate change adaptation actions

Sienna IM use phase-in provision and commit to comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of our sustainability statement, if it is impracticable to prepare quantitative disclosures.

### Disclosure of location of significant assets at material physical risk (disaggregated by NUTS codes)

For the Disclosure Requirement E1-9, Sienna IM use phase-in provision and commit to comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of our sustainability statement, if it is impracticable to prepare quantitative disclosures.

### Percentage of assets at material physical risk addressed by climate change adaptation actions

Sienna IM use phase-in provision and commit to comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of our sustainability statement, if it is impracticable to prepare quantitative disclosures.

### Net revenue from business activities at material physical risk

Sienna IM use phase-in provision and commit to comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of our sustainability statement, if it is impracticable to prepare quantitative disclosures.

## Percentage of net revenue from business activities at material physical risk

Sienna IM use phase-in provision and commit to comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of our sustainability statement, if it is impracticable to prepare quantitative disclosures.

## Disclosure of reconciliations with financial statements of significant amounts of assets and net revenue at material physical risk

Sienna IM use phase-in provision and commit to comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of our sustainability statement, if it is impracticable to prepare quantitative disclosures.

## Disclosure of how anticipated financial effects for assets and business activities at material physical risk have been assessed

For our own operations, we have conducted a thorough review and have determined that there are currently no material physical risks identified that could significantly impact our business activities.

However, regarding our investments, we apply a proactive approach to analyze and manage potential physical risks. This is achieved through our Responsible Investment approach, which mainly includes an exclusion policy and the integration of ESG criteria into our investment decision-making process with the associated scoring.

## Disclosure of how assessment of assets and business activities considered to be at material physical risk relies on or is part of process to determine material physical risk and to determine climate scenarios

For our own operations, we have conducted a thorough review and have determined that there are currently no material physical risks identified that could significantly impact our business activities.

Regarding our investments, in addition to details provided above, an effective SBTi target monitoring process is implemented ensuring our alignment with Paris Agreement Objectives through several indicators such as the Temperature Rating of our investments which indirectly serves as a metric to assess the alignment of an issuer's operations and strategies with climate goals, helping to identify potential material physical risks associated with climate change impacts on their business activities.

## Disclosure of reconciliations with financial statements of significant amounts of assets, liabilities and net revenue at material transition risk

Sienna IM use phase-in provision and commit to comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of our sustainability statement, if it is impracticable to prepare quantitative disclosures.

## Disclosure of how potential effects on future financial performance and position for assets and business activities at material transition risk have been assessed

Sienna IM use phase-in provision and commit to comply with ESRS E1-9 by reporting only qualitative disclosures for the first 3 years of preparation of our sustainability statement, if it is impracticable to prepare quantitative disclosures.

## 7.4.4.4 Social information: Own workforce

### 7.4.4.4.1 Interests and views of stakeholders

#### How is the undertaking's strategy and business model(s) influenced by it's interests, views, right and expectations of (actually and potentially) materially affected own workers, including respect for their human (including labour) rights?

For Sienna IM's activities, the interests, views, and rights of its personnel, including the respect for their human rights, inform its strategy and business model. The company's personnel are considered a key group of affected stakeholders.

In Sienna Gestion, the focus is on asset management, where employee feedback and rights are integral to shaping investment strategies and ensuring responsible management practices. In Sienna Private Credit, the emphasis is on providing credit solutions, and the insights and rights of employees help guide ethical lending practices and client interactions. In Sienna Real Estate, the business model revolves around property management and development, where the perspectives and rights of employees contribute to sustainable and responsible real estate practices.

Overall, Sienna IM integrates the interests and rights of its personnel into its business model to ensure that its operations across Sienna Gestion, Sienna Private Credit, and Sienna Real Estate are aligned with ethical standards and human rights considerations.

### 7.4.4.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model

#### Whether and how actual and potential impacts on its own workforce originate from or are connected to undertaking's strategy and business models

##### Material positive impacts:

**[IRO 4]:** Positive impact of social dialogue and freedom of association on employees. At Sienna IM, social dialogue represents strong historical values of the company culture.

**[IRO 5]:** Positive impact of the various collective agreements on employees.

**[IRO 8]:** Positive impact linked to attention to training needs identified and/or reported by employees according to their seniority, expertise and career prospects.

These impacts result from or are related to the company's strategy and business model. In Sienna Gestion, the asset management strategy takes into account the well-being and rights of employees, ensuring responsible investment practices. In Sienna Private Credit, the credit solutions strategy considers the ethical treatment of employees, influencing lending practices and client interactions. In Sienna Real Estate, the property management and development strategy incorporate employee perspectives to promote sustainable and responsible real estate practices.

#### Whether and how actual and potential impacts on its own workforce inform and contribute to adapting the undertaking's strategy and business model

##### Material positive impacts:

**[IRO 4]:** Positive impact of social dialogue and freedom of association on employees. At Sienna IM, social dialogue represents strong historical values of the company culture.

**[IRO 5]:** Positive impact of the various collective agreements on employees.

**[IRO 8]:** Positive impact linked to attention to training needs identified and/or reported by employees according to their seniority, expertise and career prospects.

These impacts influence and contribute to the adaptation of Sienna IM's strategy and business model. The insights and rights of employees help shape and refine the company's approach across Sienna Gestion, Sienna Private Credit, and Sienna Real Estate, ensuring that the business model remains aligned with ethical standards and human rights considerations. This continuous adaptation helps Sienna IM maintain a responsible and sustainable business model that respects and supports its personnel.

## The relationship between its material risks and opportunities arising from impacts and dependencies on own workforce and its strategy and business model

### Material risks and opportunities:

**[IRO 6]:** Risk of employee retention due to insufficient consideration of ESG issues.

**[IRO 7]:** Opportunity related to the seniority and expertise of Sienna IM's employee profiles.

**[IRO 9] :** Opportunity related to gender diversity, cultural diversity, and diversity of professional and educational backgrounds to develop Sienna's pan-European activities.

**[IRO 10]:** Risk associated with the security and protection of internal data to prevent the leakage of sensitive information.

For Sienna IM, there is no link or dependency between the material risks and opportunities arising from its impacts on its personnel and its strategy and business model for S1.

## All people in its own workforce who can be materially impacted by undertaking are included in scope of disclosure under ESRS 2

The sustainability reporting applies to Sienna IM and is meant to consider all the business activities and geographical areas in which Sienna IM operates. All own workforces of Sienna IM and its subsidiaries are included in the scope of disclosure.

## Description of types of employees and non-employees in its own workforce subject to material impacts

Sienna IM as a multi-expertise pan European asset manager employs experts and teams formed by around 300 talented people.

The group counts around 300 employees, with men and women in almost equal numbers and over 20 nationalities being represented.

No self- employed people / people provided by third party undertakings primarily engaged in employment activities are part of the own workforce of Sienna IM.

## Material negative impacts occurrence (own workforce)

N/A no material negative impacts

## Description of activities that result in positive impacts and types of employees and non-employees in its own workforce that are positively affected or could be positively affected

Sienna IM, as a company committed to social responsibility, implements various activities that have significant positive impacts on its employees and other stakeholders. These activities include social dialogue and freedom of association, the negotiation of collective agreements, attention to training needs, and the promotion of gender, cultural, and professional diversity. These initiatives can benefit not only employees at all levels but also suppliers, business partners, local communities, clients, and investors by creating an inclusive work environment and strengthening sustainable business relationships.

### Material positive impacts :

**[IRO 4]:** Positive impact of social dialogue and freedom of association on employees. At Sienna IM, social dialogue represents strong historical values of the company culture.

**[IRO 5]:** Positive impact of the various collective agreements on employees.

**[IRO 8]:** Positive impact linked to attention to training needs identified and/or reported by employees according to their seniority, expertise and career prospects.

## Description of material risks and opportunities arising from impacts and dependencies on own workforce

Material risks and opportunities

[**IRO 6**]**:** Risk of employee retention due to insufficient consideration of ESG issues.

[**IRO 7**]**:** Opportunity related to the seniority and expertise of Sienna IM's employee profiles.

[**IRO 9**] **:** Opportunity related to gender diversity, cultural diversity, and diversity of professional and educational backgrounds to develop Sienna's pan-European activities.

[**IRO 10**]**:** Risk associated with the security and protection of internal data to prevent the leakage of sensitive information.

## Description of material impacts on workers that may arise from transition plans for reducing negative impacts on environment and achieving greener and climate-neutral operations

There are no material impacts on workers identified from the transition plan in the DMA. This data point is considered not material.

## Information about type of operations at significant risk of incidents of forced labour or compulsory labour

Sienna IM as a responsible company: Sienna IM employs around 300 people organised into specialised investment teams and corporate functions. Sienna IM is an European actor operating in 8 countries. The vast majority of the operations is conducted within Europe, with stringent labor laws and regulations that safeguard against the risks of forced or compulsory labor.

As a financial actor, such risk within the own workforce is relatively low, given the sector of activity and the business model.

Sienna IM operates within the financial industry, and its operations in South Korea are not significant. This is due to the fact that the company has a very small number of employees in South Korea, and the country is not classified as high-risk for forced labor, particularly in the financial sector. Therefore, the impact of Sienna's operations in South Korea is minimal in this context.

## Information about countries or geographic areas with operations considered at significant risk of incidents of forced labour or compulsory labour

Sienna IM as a responsible company: Sienna IM employs around 300 people organised into specialised investment teams and corporate functions. Sienna IM is an European actor operating in 8 countries. The vast majority of the operations is conducted within Europe, with stringent labor laws and regulations that safeguard against the risks of forced or compulsory labor.

As a financial actor, such risk within the own workforce is relatively low, given the sector of activity and the business model.

Sienna IM operates within the financial industry, and its operations in South Korea are not significant. This is due to the fact that the company has a very small number of employees in South Korea, and the country is not classified as high-risk for forced labor, particularly in the financial sector. Therefore, the impact of Sienna's operations in South Korea is minimal in this context.

## Information about type of operations at significant risk of incidents of child labour

Sienna IM as a responsible company: Sienna IM employs around 300 people organised into specialised investment teams and corporate functions. Sienna IM is an European actor operating in 8 countries. The vast majority of the operations is conducted within Europe, with stringent labor laws and regulations that safeguard against the risk of child labour.

As a financial actor, such risk within the own workforce is relatively low, given the sector of activity and the business model.

Sienna IM operates within the financial industry, and its operations in South Korea are not significant. This is due to the fact that the company has a very small number of employees in South Korea, and the country is not classified as high-risk for forced labor, particularly in the financial sector. Therefore, the impact of Sienna's operations in South Korea is minimal in this context.

### Information about countries or geographic areas with operations considered at significant risk of incidents of child labour

Sienna IM as a responsible company: Sienna IM employs around 300 people organised into specialised investment teams and corporate functions. Sienna IM is an European actor operating in 8 countries. The vast majority of the operations is conducted within Europe, with stringent labor laws and regulations that safeguard against the risk of child labour.

As a financial actor, such risk within the own workforce is relatively low, given the sector of activity and the business model.

Sienna IM operates within the financial industry, and its operations in South Korea are not significant. This is due to the fact that the company has a very small number of employees in South Korea, and the country is not classified as high-risk for forced labor, particularly in the financial sector. Therefore, the impact of Sienna's operations in South Korea is minimal in this context.

### Disclosure of how understanding of people in its own workforce / value chain workers with particular characteristics, working in particular contexts, or undertaking particular activities may be at greater risk of harm has been developed

No particular activities, context or characteristics may be at greater risk of harm.

### Disclosure of which of material risks and opportunities arising from impacts and dependencies on people in its own workforce relate to specific groups of people

Sienna IM does not have material risks or opportunities arising from impacts and dependencies on people in its own workforce that relate to specific groups of people (for example, particular age groups, or people working in a particular factory or country).

## 7.4.4.4.3 Policies related to its own workforce

### Policies to manage material impacts, risks and opportunities related to own workforce, including for specific groups within workforce or all own workforce

Social Dialogue

Sienna Gestion and Sienna Private Credit (SPC) each have their own Works Council for employee representation. In contrast, Sienna IM does not have a Works Council but instead opts for leadership discussions within the Management Committee. Across all entities, a Remote Teleworking Charter governs remote work policies, and Internal Regulations in each entity safeguard the freedom of association for employees.

Employee Retention, Expertise, and Seniority

Sienna IM implements governance and policies to support the retention of its employees. Central to these efforts is the annual Compensation Committee meeting held for each entity, which takes place following the period of annual performance reviews. The purpose of this committee is to evaluate and make decisions on compensation strategies that align with the company's objectives and employee performance. Additionally, Sienna IM has established remuneration and salary policies that are designed to be competitive and fair, ensuring that employees are rewarded appropriately for their contributions and that talent retention is prioritized within the organization's strategic goals.

Training and Skills Development

Sienna IM has implemented processes for employee skills development through a dedicated training platform called SkillUp. Each employee can customize their training program by choosing and selecting directly from the learning catalog. The request is then submitted for managerial approval, and if declined, a justification is provided to the employee.

Confidentiality

At Sienna IM, confidentiality is overseen by the operational Chief Information Security Officer (CISO), who reports to the IT Director and the Risk Management Compliance function. The Data Protection Officer (DPO) also falls under the compliance reporting line.

Committee Structures

- The Management Committee (ManCo), which involves directors and operational teams, discusses topics such as security policy.
- The Group Risk and Compliance Committee, chaired by the CEO, meets quarterly with permanent members.
- The IT Steering Committee convenes quarterly to review IT governance, with proceedings documented.
- Entity-specific IT Steering Committees meet as needed, based on current topics and developments.

Sienna IM developed a strategic IT policy titled "Strategic Directions and Applicable Security Measures," which has been in place since 2023. An IT Charter was shared with all entities in July 2024 and is currently being integrated into the internal regulations of each entity. Additionally, a Personal Data Protection Policy has been developed. Since IT tools are centralized by Sienna IM's IT department, these policies are applicable across all Sienna IM entities.

The most senior person in charge of these policies is the Head of HR.

## Description of key contents of policy

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Description of scope of policy or of its exclusions

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Description of most senior level in organisation that is accountable for implementation of policy

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Disclosure of third-party standards or initiatives that are respected through implementation of policy

N/A - Sienna IM has not engaged any third-party standards or initiatives in the implementation of their policies.

## Description of consideration given to interests of key stakeholders in setting policy

N/A - This is not relevant for Sienna IM's policies because the interests of key stakeholders were not considered in setting the policy.

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

N/A - This is not relevant for Sienna IM's policies because the policy is not made available to potentially affected stakeholders, nor to stakeholders who need to help implement it.

## Description of relevant human rights policy commitments relevant to own workforce

Sienna IM as a responsible company: Sienna IM employs around 300 people organised into specialised investment teams and corporate functions. Sienna IM is an European actor operating in 8 countries. The vast majority of the operations is conducted within Europe, with stringent labor laws and regulations that safeguard against human rights violation risks.

As a financial actor, such risks within the own workforce is relatively low, given the sector of activity and the business model.

Sienna IM is a signatory of the Principles for Responsible Investment (PRI), reflecting its commitment to integrating ESG factors into its investment practices. Additionally, SIM ensures that all employment contracts comply with local labor laws in Europe and South Korea, including provisions related to human rights. This adherence to the PRI and local labor laws highlights SIM's focus on ethical business practices and the protection of employee rights.

## Disclosure of general approach in relation to respect for human rights including labour rights, of people in its own workforce

Sienna IM as a responsible company and investor acts in accordance with European and internationals laws, bans, treaties such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

SIM ensures that all employment contracts comply with local labor laws in Europe and South Korea, including provisions related to human rights. This adherence to the PRI and local labor laws highlights SIM's focus on ethical business practices and the protection of employee rights.

No material matters in relation to respect for human rights including labour rights, of people in our own workforce.

## Disclosure of general approach in relation to engagement with people in its own workforce

Sienna IM highlights its engagement strategy through the implementation of various Works Councils for employee representation. These councils serve as a formal mechanism for fostering dialogue and collaboration between the management and employees. They provide a structured platform for discussing workplace issues, sharing insights, and collectively developing solutions that contribute to a positive and productive work environment.

## Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts

There are no material impacts on workers identified from the transition plan in the DMA. This data point is considered not material.

## Disclosure of whether and how policies are aligned with relevant internationally recognised instruments

Sienna IM as a responsible company and investor acts in accordance with European and internationals laws, bans, treaties such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

An ESG Policy and an Exclusion Policy based on international recognised Principles and Guidelines - govern Sienna IM's investment activities. As a company, Sienna IM must set an example and apply the exact same rules relating to respect for human rights as those in force for investee companies.

Sienna IM is a signatory of the Principles for Responsible Investment (PRI) and complies with European laws in line with the UN Guidelines.

## Policies explicitly address trafficking in human beings, forced labour or compulsory labour and child labour

Sienna IM as a responsible company: Sienna IM employs around 300 people organised into specialised investment teams and corporate functions. Sienna IM is an European actor operating in 8 countries. Sienna IM policies in relation to its own workforce do not explicitly address trafficking in human beings, forced labour or compulsory labour and child labour. However, these points will be integrated, but as being a EU company, Sienna IM is already respecting stringent laws and regulations that safeguard against the risks of trafficking in human beings, forced or compulsory labor, and child labor.

As a financial actor, such risks within the own workforce is relatively low, given the sector of activity and the business model.

## Workplace accident prevention policy or management system is in place

First aid training is proposed to Sienna IM's employees and defibrillators are available on the company's sites.

No specific policy on work accident has been established.

## Specific policies aimed at elimination of discrimination are in place

A policy regarding diversity is not available yet. However, a Diversity Charter will be developed and deployed in 2025.

The Diversity Charter of Sienna IM is a work in progress, scheduled for completion in 2025. It will be based on common best practices from existing diversity charters.

## Grounds for discrimination are specifically covered in policy

A Diversity Charter will be developed and deployed in 2025.

The Diversity Charter of Sienna IM is a work in progress, scheduled for completion in 2025. It will be based on common best practices from existing diversity charters.

## Disclosure of specific policy commitments related to inclusion and (or) positive action for people from groups at particular risk of vulnerability in own workforce

Dedicated disability training is proposed to Sienna IM's employees. At the end of 2023, this training was conducted for all employees in France.

## Disclosure of whether and how policies are implemented through specific procedures to ensure discrimination is prevented, mitigated and acted upon once detected, as well as to advance diversity and inclusion

Though its ESG Policy, Sienna IM is committed to the following principles:

- To create a positive and long-term working relationship with its employees, with regular meetings and feedback sessions;
- To provide a diverse and inclusive work environment in which individuals are treated with mutual respect, dignity and fairness, via training programs;
- Ensure equal opportunities for recruitment, appointment and promotion on the basis of appropriate qualifications, requirements and performance;
- To provide a safe and healthy working environment, free from all forms of discrimination.

The D&I Policy elaborates on these principles and indicates to whom Sienna employees can refer.

Additionally, Sienna IM plans to develop and deploy a Diversity Charter in 2025, with thorough planning, consultation, and monitoring mechanisms to ensure its effectiveness.

### Reasons for not having adopted policies

Sienna IM has adopted policies and actions with reference to the specific sustainability matters concerned, and therefore, does not need to disclose reasons for not having adopted such policies or actions.

### The undertaking shall provide an accurate cross-reference to identify the aspects of the policy that satisfy the requirements

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

## 7.4.4.4.4 Processes for engaging with own workers and workers' representatives about impacts

### Disclosure of whether and how perspectives of own workforce inform decisions or activities aimed at managing actual and potential impacts

Sienna Gestion and Sienna Private Credit (SPC) each have their own Works Council for employee representation who meet regularly throughout the year.

At Sienna Investment Management (SIM) regular leadership discussions are held within the Management Committee.

Additionally, other consultation channels are used, including employee surveys, to gather broader employee feedback and ensure that the perspectives of the workforce are considered in decision-making processes.

### Engagement occurs with own workforce or their representatives

Sienna Gestion and Sienna Private Credit (SPC) each have their own Works Council for employee representation who meet regularly throughout the year.

At Sienna IM regular leadership discussions are held within the Management Committee. Employees' representatives are present during these meetings.

### Disclosure of the stage at which engagement occurs, type of engagement and frequency of engagement

There are several Works Councils (CSE) within the Sienna IM group. For SPC, meetings are held every three weeks, ensuring regular employee representation and dialogue. For SGE, meetings are held at least four times a year, providing a structured platform for discussing employee-related matters and maintaining effective communication within the organization.

### Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens

The function and the most senior role within Sienna IM that has operational responsibility for ensuring that this engagement happens and that the results inform the company's approach is the Human Resources Director, who oversees all consultation initiatives and ensures that employee feedback is integrated into the company's strategic decisions.

### Disclosure of Global Framework Agreement or other agreements related to respect of human rights of workers

Sienna IM does not have a global framework agreement or other agreements with workers' representatives regarding the respect of human rights of its own workforce.

### Disclosure of how the effectiveness of engagement with its workforce is assessed

Sienna IM assesses the effectiveness of its engagement with its workforce through the Lucca tool during the annual review process, which tracks employee feedback and performance. The Human Resources Director ensures that the findings from these tools and sessions inform the company's strategic decisions, enhancing overall employee engagement.

### Disclosure of steps taken to gain insight into perspectives of people in its own workforce that may be particularly vulnerable to impacts and (or) marginalised

Sienna IM reports that there are no employees identified as particularly vulnerable to impacts or marginalized within its workforce.

## 7.4.4.4.5 Processes to remediate negative impacts and channels for own workers to raise concerns

### Disclosure of general approach to and processes for providing or contributing to remedy where an undertaking has caused or contributed to a material negative impact on people in its workforce

The ESRS S1 of Sienna IM does not identify any material negative impacts, therefore no remediation processes can be described to address this data point.

### Disclosure of specific channels in place for its workforce to raise concerns or needs directly with undertaking and have them addressed

see above

### Grievance or complaints handling mechanisms related to employee matters exist

Through Work Councils of respective Sienna IM's expertises.

The Work Council mechanisms at Sienna IM allow employees to bring their concerns to the CSE. If needed, the issue can be proposed for inclusion in the meeting agenda. The final agenda is determined by the management. This process provides a way for employee grievances to be considered.

### Disclosure of processes through which undertaking supports or requires the availability of channels

Through Work Councils of respective Sienna IM's expertises.

Sienna IM does not have a formalized grievance or complaints mechanism in place. However, members of the Works Council (CSE) are always available to assist employees with their concerns. This informal approach ensures that employees have access to support and can discuss their issues with CSE representatives, who can then propose these matters for discussion in the council meetings if necessary.

### Disclosure of how issues raised and addressed are tracked and monitored and how effectiveness of channels is ensured

Through Work Councils of respective Sienna IM's expertises. Sienna IM does not have a formal tracking or monitoring system for grievances or complaints. However, employees are encouraged to bring their concerns to the attention of the Works Council (CSE) members, who are always available to assist.

### Disclosure of whether and how it is assessed that its own workforce is aware of and trust structures or processes as way to raise their concerns or needs and have them addressed

Through Work Councils of respective Sienna IM's expertises. While the final agenda for these meetings is determined by management, the availability of CSE members provides a channel for employees to voice their grievances and seek resolution.

In addition, HR policies and procedures are sent by email to all Sienna's employees.

### Policies regarding protection against retaliation for individuals that use channels to raise concerns or needs are in place

HR processes are available for each employee on Lucca. HR processes at Sienna IM are accessible to all employees through the Lucca platform. This centralized system provides comprehensive information on various HR procedures, ensuring that employees can easily find and understand the steps involved in addressing their concerns or needs.

Furthermore, SIM Group has instaured a "whistle blowing procedure" at Group Level, that accommodates alerts from internal or external stakeholders through an external dedicated and secured website, guaranteeing strict confidentiality. This policy and the link to dedicated website is available on SIM main website.

## 7.4.4.4.6 Actions and resources in relation to own workforce

### Description of action taken, planned or underway to prevent or mitigate negative impacts on own workforce

*See below*

### Disclosure on whether and how action has been taken to provide or enable remedy in relation to actual material impact

*See below*

### Description of additional initiatives or actions with primary purpose of delivering positive impacts for own workforce

Social dialogue

Sienna IM's Remote teleworking Charter emphasizes voluntary participation, requiring manager approval for employees to access remote work. Eligibility criteria include a 4-month tenure for familiarization with the company's operations. Interns and apprentices may telework for one day per week with the consent of their mentor, management, and educational institution, aligning with educational goals.

Trainings and skills development

Sienna IM has implemented a comprehensive mandatory training program on ESG, organized by the Chief Sustainability Officer. All Sienna Gestion employees have undergone extensive training through a two-modules program.

The first module "ESG Fundamentals" covers the basics of ESG integration presenting key terms, climate and biodiversity issues, value creation opportunities, and the implications for Sienna IM and its various areas of expertise. This module is mandatory for all Sienna Gestion and Sienna IM employees and is delivered in 2-hour sessions to groups of 15-20 people.

The second module "Specific and Practical ESG Issues by Profession" is tailored to Sienna Gestion employees and their respective roles. It includes regulatory frameworks and is structured as 6-hour training divided into three sessions, both in-person and virtual, customized for different professional groups such as the executive team, management, analysts, sales and marketing, but also middle office and reporting. This module has a participation and completion rate of 80%.

Diversity

In Sienna IM's own operations, several of working groups have been launched, including one on human capital management, whose mission is to focus on the issues of diversity, equity and inclusion.

Sienna IM is also involved in market discussions on this subject, since the Deputy Managing Director of Sienna's Private Debt expertise, Marianne des Roseaux, is President of the AFG's Diversity Commission.

Several actions have been implemented by Sienna IM to promote diversity. These include the opportunity for individuals to act as whistleblowers and/or referents for diversity and harassment issues. Training on disability and anti-harassment measures has also been provided. At Sienna Gestion, a summary of the gender equality index for the year 2024, based on 2023 data, has been compiled, showing an increase in team sizes across all age groups, with a notable inclusion of younger profiles, leading to a workforce that spans a broad age range and a significant increase in female representation.

### Description of how effectiveness of actions and initiatives in delivering outcomes for own workforce is tracked and assessed

Social dialogue

A 'social climate survey' among all Sienna IM's employees is conducted every 18 months. Through a communication campaign, employees are invited to respond to this survey anonymously. Feedback and results from this survey are made available and communicated to all employees.

#### Training and skills development

Sienna Gestion has achieved full participation in its ESG training program, with 100% of employees completing a general module designed to provide a broad understanding of ESG principles. Additionally, 80% of employees in specific job functions have participated in an in-depth, 8-hour training tailored to the ESG aspects relevant to their roles. This specialized training ensures that a significant portion of the workforce is well-versed in ESG considerations pertinent to their professional responsibilities.

## Description of process through which it identifies what action is needed and appropriate in response to particular actual or potential negative impact on own workforce

### Social dialogue

- Sienna IM has identified core values of Ambition, Innovation, Cohesion, and Excellence based on employee insights from an internal survey, along with a Client-Centric approach. A voluntary HR workshop will discuss integrating these values into daily work.

Immediate HR initiatives are set up such as:

- A recruitment platform for internal mobility and collaborative hiring (via www.smartrecruiters.com).
- A training platform offering skill development opportunities (via www.skillup.co).
- The “Sienna Innovation” Committee, where volunteers from each business unit will suggest innovations to enhance customer service and internal processes.

At Sienna Gestion, through the Work Council for employee representation, the social policy, working conditions, and employment are regularly addressed. Sienna Gestion has implemented a social footprint initiative that encompasses recruitment efforts, an onboarding process, and unique HR measures such as a CSR commitment, which is a criterion in the profit-sharing agreement. Additionally, this agenda item allowed Sienna Gestion to outline the new directions of its social policy projected for 2025.

The ESRS S1 of Sienna IM does not identify any material negative impacts, therefore no processes can be described to address this data point.

## Description of what action is planned or underway to mitigate material risks arising from impacts and dependencies on own workforce and how effectiveness is tracked

No specific action is planned in the future.

### Employees retention

Sienna IM’s core values, emphasizing sustainable innovation as a primary value. This highlights the company’s commitment to integrating ESG considerations at the heart of its operations, which acts as a mitigating factor against the risk of employee attrition within the group.

At Sienna Gestion, a ‘Non Profit-Sharing and Working Time Agreements for Cap 2025’ ambition outlines the new employee profit-sharing scheme. Notably, Sienna Gestion’s CSR commitment is incorporated into the profit-sharing agreement with three key elements:

- A 50/50 distribution between working time and salary ;
- A redistributive criterion favoring lower salaries: bonus based on fixed salary ;
- Consideration of presence, including maternity, paternity, adoption leave, and deduction of non-effective work absences exceeding 30 days per year. This ensures alignment between profit-sharing distribution and the company’s strategy. The new profit-sharing agreement is signed for a three-year term, coinciding with the Cap 2025 timeframe. This contributes to the retention of employees at Sienna Gestion.

It should be added that actions related to employee retention are primarily managed at the Sienna Gestion level, while the commitments are addressed at the group level.

### Data protection

In 2023 and 2024, Sienna IM implemented a series of actions to mitigate the risk to internal data protection:

- The automatic locking time for workstations was reduced to 5 minutes from the previous 30 minutes.
- Measures to combat data leakage were introduced, including the blocking of USB ports, web filtering to prevent the use of online data-sharing services, and the ongoing rollout of restrictions on uploading files via personal emails.
- An Endpoint Detection and Response (EDR) system was deployed to identify unusual activities, notify the IT department, and engage management for decisions on potential investigations.
- A monthly newsletter was distributed via email and the intranet to keep employees informed.
- Mandatory e-learning was introduced for all Sienna IM staff, utilizing Knowbe4 in 2023 and SharePoint with a Microsoft questionnaire in 2024.
- A secure file-sharing platform, Oodrive, was launched in 2023, initially with 4 or 5 users, growing to approximately 45 users today.

## Description of what action is planned or underway to pursue material opportunities in relation to own workforce

Within the framework of Sienna's DMA, only one material opportunity has been identified under ESRS S1, which relates to diversity. The only action currently planned by Sienna IM to address this opportunity is the introduction of a Diversity Charter, set to be implemented in 2025.

## Disclosure of whether and how it is ensured that own practices do not cause or contribute to material negative impacts on own workforce

Sienna IM does not identify any material negative impacts for ESRS S1.

## Disclosure of resources allocated to the management of material impacts

### Social dialogue

The Human Resources team at Sienna IM closely monitor the response rate and trends in feedback from the 'social climate' survey. A communication campaign is established to engage all employees, emphasizing the importance of their input and ensuring widespread awareness and participation in the survey process. This approach allows Sienna IM to continuously refine its workplace practices and enhance employee satisfaction.

Trainings and skills development

SkillUP serves as a resource for Sienna IM, offering a catalog of elective training programs that can be attended either in-person or online. The platform streamlines the connection with training providers and supports the monitoring and approval process within the training itself. Additionally, SkillUP presents an array of ESG-related training courses, enhancing Sienna IM's commitment to sustainability and governance education.

### Data protection

- Training participation rates (percentage of trained employees) are monitored by the compliance officers of each entity, who report to the Group Risk and Compliance Committee. This is done through questionnaires, with an Excel document used to track responses and "certificates" issued to those who achieve a minimum of 50% of correct answers.
- Access to email accounts by delegation is tracked with the aim of sharing these delegation lists with the heads of various entities. This was decided on September 25, 2024, with a minimum annual review.
- Regular reports on exceptions that have been granted (such as special authorization for USB ports) are shared with the different entities, with a minimum annual update, or more frequently if required due to observed changes.

## Information about measures taken to mitigate negative impacts on workers that arise from transition to greener, climate-neutral economy

N/A

## Disclosure of key action

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

## Description of scope of key action

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

## Time horizon under which key action is to be completed

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

### Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

### Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

It is the first exercise of Sienna IM, hence, there are no prior periods.

### Disclosure of the type of current and future financial and other resources allocated to the action plan

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Current financial resources allocated to action plan (Capex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Current financial resources allocated to action plan (Opex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Future financial resources allocated to action plan (Capex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Future financial resources allocated to action plan (Opex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Reasons for not having adopted actions

Sienna IM has adopted policies and actions with reference to the specific sustainability matters concerned, and therefore, does not need to disclose reasons for not having adopted such policies or actions.

### Distinction is to be made between evidence of certain activities having occurred from evidence of actual outcomes for the people concerned

When Sienna IM publishes its indicators, it makes a clear distinction between the evidence of certain activities (e.g., the number of people who received financial literacy training) and the evidence of actual outcomes for the individuals involved (e.g., the number of people who report being able to better manage their salary and household budget). This differentiation ensures that both the implementation of activities and their real impact on personnel are transparently communicated.

## 7.4.4.4.7 Tracking effectiveness of policies and actions through targets

### Disclosure of whether and how own workforce or workforce' representatives were engaged directly in setting targets

No specific targets were set.

### Disclosure of whether and how own workforce or workforce' representatives were engaged directly in tracking performance against targets

No specific targets were set.

### Disclosure of whether and how own workforce or workforce' representatives were engaged directly in identifying lessons or improvements as result of undertakings performance

No specific targets were set.

### Relationship with policy objectives

Sienna IM cannot disclose the information on targets required under the relevant topical ESRS, because it has not set targets with reference to the specific sustainability matter concerned.

### Measurable target

Sienna IM cannot disclose the information on targets required under the relevant topical ESRS, because it has not set targets with reference to the specific sustainability matter concerned.

### Description of scope of target

Sienna IM cannot disclose the information on targets required under the relevant topical ESRS, because it has not set targets with reference to the specific sustainability matter concerned.

### Baseline value and year

Sienna IM cannot disclose the information on targets required under the relevant topical ESRS, because it has not set targets with reference to the specific sustainability matter concerned.

### Period to which target applies

Sienna IM cannot disclose the information on targets required under the relevant topical ESRS, because it has not set targets with reference to the specific sustainability matter concerned.

### Description of methodologies and significant assumptions used to define target

Sienna IM cannot disclose the information on targets required under the relevant topical ESRS, because it has not set targets with reference to the specific sustainability matter concerned.

### Target related to environmental matters is based on conclusive scientific evidence

Sienna IM cannot disclose the information on targets required under the relevant topical ESRS, because it has not set targets with reference to the specific sustainability matter concerned.

### Disclosure of how stakeholders have been involved in target setting

Sienna IM cannot disclose the information on targets required under the relevant topical ESRS, because it has not set targets with reference to the specific sustainability matter concerned.

### Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data

Sienna IM cannot disclose the information on targets required under the relevant topical ESRS, because it has not set targets with reference to the specific sustainability matter concerned.

### Description of performance against disclosed target

Sienna IM cannot disclose the information on targets required under the relevant topical ESRS, because it has not set targets with reference to the specific sustainability matter concerned.

## 7.4.4.4.8 Characteristics of the undertaking's employees

### Employees, by gender (headcount)

| Gender | LUCCA | SRE UK | Vercap | Total | Percentage |
|---|---|---|---|---|---|
| Women | 106 | 0 | 6 | 112 | 41.33% |
| Men | 143 | 2 | 14 | 159 | 58.67% |
| Other | 0 | 0 | 0 | 0 | 0.00% |
| Not disclosed | 0 | 0 | 0 | 0 | 0.00% |
| Total | 249 | 2 | 20 | 271 | 100.00% |

### Average number of employees (headcount)

| | LUCCA | SRE UK | Vercap | Total |
|---|---|---|---|---|
| Average number of employees | 246.58 | 2.00 | 18.58 | 267.17 |

### Employee turnover

| | LUCCA | SRE UK | Ver Cap | Total |
|---|---|---|---|---|
| Turnover | 14.19% | | 13.00% | 13.85% |
| Employees recruited 2024 | 42 | 0 | 6 | 48 |
| Employees who have left the undertaking 2024 | 35 | 0 | 2 | 37 |
| Number of employees | 249 | 2 | 20 | 271 |

### Description of methodologies and assumptions used to compile data (employees)

Data come from Lucca SIRH Software and two expertise data which are not included in Lucca, as of end December 2024 and in headcount

### Employees numbers are reported in head count or full-time equivalent

Employee numbers are reported in headcount.

### Employees numbers are reported at end of reporting period/average/other methodology

Employee numbers are reported in headcount, as of end December 2024.

### Report contextual information necessary to understand the data reported on employee demographic

HR data reported is based on head count, unless explicitly requested by the regulation. Data is as of End of December 2024 , unless explicitly requested by the regulation. Data comes from our internal tool, Lucca, and from HR data.

### Disclosure of cross-reference of information reported to most representative number in financial statements

N/A Sienna IM's 2024 financial statements have not been disclosed yet.

## Number of employees and average in countries with 50 or more employees representing at least 10% of total number of employees

| Country concerned | Headcount of employees |
|---|---|
| **France** | |
| Sienna 2A | 1 |
| Sienna AM France | 45 |
| Sienna AM Luxembourg, French Branch | 19 |
| Sienna Gestion S.A. | 77 |
| Sienna Real Estate France S.A.S. | 12 |
| Total | 154 |
| Average | 151.2 |

## Headcount of employees by geographical areas

| Geographical area | Headcount of employees |
|---|---|
| Europe | 268 |
| Asia | 3 |

## Employees, by contract type, by gender

| | Lucca | | SRE UK | | Ver Cap | | Total | |
|---|---|---|---|---|---|---|---|---|
| | Female | Male | Female | Male | Female | Male | Female | Male |
| Permanent contract employees | 96 | 132 | 0 | 2 | 5 | 14 | 101 | 148 |
| Temporary contract employees | 10 | 11 | 0 | 0 | 1 | 0 | 11 | 11 |
| Total | 106 | 143 | 0 | 2 | 6 | 14 | 112 | 159 |

## Employees, by contract type, by gender, by region

| | Europe | | | | | | Asia | |
|---|---|---|---|---|---|---|---|---|
| | Europe countries on LUCCA | | SRE UK | | Ver Cap | | Korea | |
| | Female | Male | Female | Male | Female | Male | Female | Male |
| Part-time employees | 24 | 9 | 0 | 0 | 2 | 0 | 0 | 0 |
| Full-time employees | 80 | 133 | 0 | 2 | 4 | 14 | 2 | 1 |
| Total | 104 | 142 | 0 | 2 | 6 | 14 | 2 | 1 |

## Where data is not available for detailed information, the undertaking shall use an estimation of the employee number or ratios

Sienna only used reported data and no proxy information for HR data.

## Methodologies and significant assumptions behind the metric

Sienna uses headcount at end December 2024, unless differently specified.

**Formula used for number of employees per gender, number of employees:** Sum of the information coming from the Lucca SIRH software and two expertise data which are not included in Lucca.

**Formula used for average of employees:** sum of monthly average of the information coming from the Lucca SIRH software and two expertise data which are not included in Lucca/ 12.

**Formula used for the turnover is:** Number of employees who left the undertaking  coming from the Lucca SIRH software and two expertise data which are not included in Lucca/total average

## Metric is validated by an external body other than the assurance provider

Data was not audited by an external body other than the assurance provider.

## Label and define the metric using meaningful, clear and precise names and descriptions

Sienna defined the metric using meaningful, clear and precise names and descriptions.

## When currency is specified as the unit of measure, use the presentation currency of its financial statements

Sienna only uses EUR currency in CSRD.

## 7.4.4.4.9 Employees covered by collective agreements

### Percentage of employees covered by collective bargaining agreements

| | SRE Germany | SRE Korea | SRE UK | SRE iberica | SRE Netherlands | SRE France | Sienna FR | Sienna IM Luxembourg | Ver Cap | Total |
|---|---|---|---|---|---|---|---|---|---|---|
| Percentage of total employees covered by collective bargaining agreements | 0 | 0 | 2 | 9 | 0 | 12 | 142 | 0 | 20 | 68.27% |
| Percentage of own employees covered by collective bargaining agreements are within coverage rate by country with significant employment (in the EEA) | | | | | | 100% | 100% | | | 100% |
| Percentage of own employees covered by collective bargaining agreements (outside EEA) by region | | 0 | | | | | | | | 0% |

| | Collective Bargaining Coverage | | Social dialogue |
|---|---|---|---|
| **Coverage rate** | **Employees – EEA (for countries with >50 empl. representing >10% total empl.)** | **Employees – Non-EEA (estimate for regions with >50 empl. representing >10% total empl)** | **Workplace representation (EEA only) (for countries with >50 empl. representing >10% total empl)** |
| 0-19% | | | |
| 20%-39% | | | |
| 40-59% | | | |
| 60-79% | | | |
| 80-100% | France | | France |

## Disclosure of existence of any agreement with employees for representation by European Works Council (EWC), Societas Europaea (SE) Works Council, or Societas Cooperativa Europaea (SCE) Works Council

There is no such agreement in place.

## In which European Economic Area (EEA) countries has the undertaking significant employment

France is the only country with more than 50 employees and representing at least 10% of its total employees.

## Methodologies and significant assumptions behind the metric

Sienna relies on headcount at the end of 2024.

**Methodology used for data points related to collective bargaining agreement:** Each HR representative for each country where Sienna operates gave the number of employees (headcount) covered by collective bargaining agreement, as of end of December. Data was then aggregated.

**Methodology used for data points related to employees covered by workers' representatives:** Each HR representative for each country where Sienna operates gave the number of employees (headcount) covered by workers' representatives, as of end of December. Data was then aggregated.

## Metric is validated by an external body other than the assurance provider

Data was not audited by an external body other than the assurance provider.

## Label and define the metric using meaningful, clear and precise names and descriptions

Sienna defined the metric using meaningful, clear and precise names and descriptions.

## When currency is specified as the unit of measure, use the presentation currency of its financial statements

Sienna only uses EUR currency in CSRD.

### 7.4.4.4.10 Diversity metrics

## Gender distribution in number of employees (head count) at top management level

| | Female | Male | total |
|---|---|---|---|
| Sim Man Co | 1 | 7 | 8 |
| SPC | 1 | 1 | 2 |
| SRE | | 4 | 4 |
| Ver Cap | | 1 | 1 |
| SIM Executive | 2 | 1 | 3 |
| SGE | 1 | 2 | 3 |
| Total (head count) | 5 | 16 | 21 |
| Percentage gender distribution at top management level | 24% | 76% | 100% |

## Disclosure of own definition of top management used

Sienna defines it as follows:

**Supervisory body:** Sienna IM's board of Directors - 6 members

**Management bodies:** Executive people - 21 members

### Employees by age group

| | LUCCA | SRE UK | Ver Cap | Total | % |
|---|---|---|---|---|---|
| Between 30 and 50 years old | 158 | 2 | 12 | 172 | 63.47% |
| Under 30 years old | 43 | 0 | 3 | 46 | 17% |
| Over 50 years old | 48 | 0 | 5 | 53 | 20% |
| Total | 249 | 2 | 20 | 271 | 100% |

### Methodologies and significant assumptions behind the metric

Sienna relies on headcount at end December 2024.

**Top management methodology:** Top management employees correspond to Sienna IM's Management Committee members, Sienna expertise's Management Committee members, and other business heads.

**Age distribution methodology:** information coming from the Lucca SIRH software and two expertise data which are not included in Lucca.

### Metric is validated by an external body other than the assurance provider

Data was not audited by an external body other than the assurance provider.

### Label and define the metric using meaningful, clear and precise names and descriptions

Sienna defined the metric using meaningful, clear and precise names and descriptions.

### When currency is specified as the unit of measure, use the presentation currency of its financial statements

Sienna only uses EUR currency in CSRD.

## 7.4.4.4.11 Social protection

### All employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to sickness

In France, Sienna IM ensures that all employees are covered by mutual health insurance and provident schemes ('mutuelle et prévoyance'), which offer comprehensive protection against income loss due to sickness. These schemes are part of a broader social protection system that provides employees with financial security in the event of health-related work absences.

There is no specific methodology to determine that all employees are covered, as the social protection system in France is mandatory. This means that all employees are automatically included under the national social security system, which ensures comprehensive coverage. This requirement is a legal obligation, ensuring that all employees receive the necessary social protection benefits without the need for additional verification or methodology. Consequently, compliance with this legal framework guarantees that all employees are adequately covered.

For operations outside of France, in other geographical regions, Sienna IM confirms that social coverage is provided to all employees. This coverage may vary depending on the public programs available in each country or the specific benefits offered by Sienna IM.

Sienna IM does not have a private insurance system that supplements the local social protection system.

### All employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to unemployment starting from when own worker is working for undertaking

In France, Sienna IM ensures that all employees are covered by mutual health insurance and provident schemes ('mutuelle et prévoyance'), which offer comprehensive protection against income loss due to unemployment starting from when own worker is working for undertaking. These schemes are part of a broader social protection system that provides employees with financial security in the event of health-related work absences.

There is no specific methodology to determine that all employees are covered, as the social protection system in France is mandatory. This means that all employees are automatically included under the national social security system, which ensures comprehensive coverage. This requirement is a legal obligation, ensuring that all employees receive the necessary social protection benefits without the need for additional verification or methodology. Consequently, compliance with this legal framework guarantees that all employees are adequately covered.

For operations outside of France, in other geographical regions, Sienna IM confirms that social coverage is provided to all employees. This coverage may vary depending on the public programs available in each country or the specific benefits offered by Sienna IM.

Sienna IM does not have a private insurance system that supplements the local social protection system.

## All employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to employment injury and acquired disability

In France, Sienna IM ensures that all employees are covered by mutual health insurance and provident schemes ('mutuelle et prévoyance'), which offer comprehensive protection against income loss due to employment injury and acquired disability. These schemes are part of a broader social protection system that provides employees with financial security in the event of health-related work absences.

There is no specific methodology to determine that all employees are covered, as the social protection system in France is mandatory. This means that all employees are automatically included under the national social security system, which ensures comprehensive coverage. This requirement is a legal obligation, ensuring that all employees receive the necessary social protection benefits without the need for additional verification or methodology. Consequently, compliance with this legal framework guarantees that all employees are adequately covered.

For operations outside of France, in other geographical regions, Sienna IM confirms that social coverage is provided to all employees. This coverage may vary depending on the public programs available in each country or the specific benefits offered by Sienna IM.

Sienna IM does not have a private insurance system that supplements the local social protection system.

## All employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to parental leave

In France, Sienna IM ensures that all employees are covered by mutual health insurance and provident schemes ('mutuelle et prévoyance'), which offer comprehensive protection against income loss due to parental leave. These schemes are part of a broader social protection system that provides employees with financial security in the event of health-related work absences.

There is no specific methodology to determine that all employees are covered, as the social protection system in France is mandatory. This means that all employees are automatically included under the national social security system, which ensures comprehensive coverage. This requirement is a legal obligation, ensuring that all employees receive the necessary social protection benefits without the need for additional verification or methodology. Consequently, compliance with this legal framework guarantees that all employees are adequately covered.

For operations outside of France, in other geographical regions, Sienna IM confirms that social coverage is provided to all employees. This coverage may vary depending on the public programs available in each country or the specific benefits offered by Sienna IM.

Sienna IM does not have a private insurance system that supplements the local social protection system.

## All employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to retirement

All Sienna IM's employees are covered by social protection healthcare insurances (public/and or private) legally mandatory in each respective countries. Same logic for pension plans.

## Disclose the countries where employees do not have social protection with regard to one or more of the types of events

Sienna IM cannot confirm that all its employees are covered, as this information is currently unavailable.

## Disclosure of types of employees who are not covered by social protection, through public programs or through benefits offered, against loss of income due to sickness

Sienna IM cannot confirm that all its employees are covered, as this information is currently unavailable.

## Disclosure of types of employees who are not covered by social protection, through public programs or through benefits offered, against loss of income due to unemployment starting from when own worker is working for undertaking

Sienna IM cannot confirm that all its employees are covered, as this information is currently unavailable.

## Disclosure of types of employees who are not covered by social protection, through public programs or through benefits offered, against loss of income due to employment injury and acquired disability

Sienna IM cannot confirm that all its employees are covered, as this information is currently unavailable.

### Disclosure of types of employees who are not covered by social protection, through public programs or through benefits offered, against loss of income due to maternity leave

Sienna IM cannot confirm that all its employees are covered, as this information is currently unavailable.

### Disclosure of types of employees who are not covered by social protection, through public programs or through benefits offered, against loss of income due to retirement

Sienna IM cannot confirm that all its employees are covered, as this information is currently unavailable.

### All its employees are covered by social protection, through public programs or through benefits offered by the undertaking, against loss of income

100% of our employees are covered by social protection for the following 5 situations:

- Sickness;
- Unemployment starting from when the own worker is working for the undertaking;
- Employment injury and acquired disability;
- Parental leave;
- Retirement

### Methodologies and significant assumptions behind the metric

Sienna relies on headcount at end December 2024.

Social protection methodology: information coming from each HR representative of each country where Sienna operates.

### Metric is validated by an external body other than the assurance provider

Data was not audited by an external body other than the assurance provider.

### Label and define the metric using meaningful, clear and precise names and descriptions

Sienna defined the metric using meaningful, clear and precise names and descriptions.

### When currency is specified as the unit of measure, use the presentation currency of its financial statements

Sienna only uses EUR currency in CSRD.

## 7.4.4.4.12 Employees with disabilities

### Percentage of persons with disabilities amongst employees subject to legal restrictions on collection of data

2,21%

| | Total | Sienna Gestion | Sienna Investment managers | Sienna AM France | VER CAP | SRE France | SRE Germany | SRE Netherlands | SRE Iberica | SRE Korea | SRE UK |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Men | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Women | 5 | 2 | 0 | 2 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| Total | 6 | 3 | 0 | 2 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |

### Disclosure of contextual information necessary to understand data and how data has been compiled (persons with disabilities))

We asked each HR representative to communicate the number of disabled people in their subsidiaries. We then related this figure to the total workforce.

### Methodologies and significant assumptions behind the metric

Sienna relies on headcount at end December 2024.

Disability methodology: information coming from each HR representative of each country where Sienna operates.

### Metric is validated by an external body other than the assurance provider

Data was not audited by an external body other than the assurance provider.

### Label and define the metric using meaningful, clear and precise names and descriptions

Sienna defined the metric using meaningful, clear and precise names and descriptions.

### When currency is specified as the unit of measure, use the presentation currency of its financial statements

Sienna only uses EUR currency in CSRD.

## 7.4.4.4.13 Training and skills development indicators

### Employees that participated in regular performance and career development reviews

| | Number | Percentage |
|---|---|---|
| Employees that participated in regular performance and career development reviews | 271 | 100% |
| Average number of employees that participated in regular performance and career development reviews | 267.17 | 100% |
| Non employees that participated in regular performance and career development reviews | 0 | 0% |

### Average number of hours of training provided to employees, by gender

| Gender | Number of employees participating training | % employees participating training | Average number of hours of training provided to employees |
|---|---|---|---|
| Women | 70 | 62.50% | 11.00 |
| Men | 99 | 62.26% | 8.00 |
| Total | 169 | 62.36% | 10.00 |

### Methodologies and significant assumptions behind the metric

Sienna relies on headcount at end December 2024.

**Regular performance and career development:** information coming from each HR representative of each country where Sienna operates.

**Training hours methodology:** information coming from Skillup tool for France, and HR representatives for the other countries where Sienna operates.

### Metric is validated by an external body other than the assurance provider

Data was not audited by an external body other than the assurance provider.

### Label and define the metric using meaningful, clear and precise names and descriptions

Sienna defined the metric using meaningful, clear and precise names and descriptions.

### When currency is specified as the unit of measure, use the presentation currency of its financial statements

Sienna only uses EUR currency in CSRD.

## 7.4.4.5 Social Information: Consumers and End-Users

### 7.4.4.5.1 Interest and views of stakeholders

#### The undertaking shall disclose how the interests, views and rights of its consumers and/or end-users inform its strategy and business model

For Sienna IM's activities, the interests, views, and rights of end consumers inform its strategy and business model. End consumers are considered a key group of affected stakeholders.

In Sienna Gestion, the focus is on asset management, where feedback from end consumers is integral to shaping investment strategies and ensuring responsible management practices. In Sienna Private Credit, the emphasis is on providing credit solutions, and the insights and rights of end consumers help guide ethical lending practices and client interactions. In Sienna Real Estate, the business model revolves around property management and development, where the perspectives and rights of end consumers contribute to sustainable and responsible real estate practices.

Overall, Sienna IM integrates the interests and rights of end consumers into its business model to ensure that its operations across Sienna Gestion, Sienna Private Credit, and Sienna Real Estate are aligned with ethical standards and consumer rights considerations.

### 7.4.4.5.2 Material impacts, risks and opportunities and their interaction with strategy and business model

#### Whether and how actual and potential impacts on consumers and/or end-users originate from or are connected to undertaking's strategy and business models

These impacts result from or are related to the company's strategy and business model. In Sienna Gestion, the asset management strategy takes into account the needs and rights of end consumers, ensuring responsible investment practices. In Sienna Private Credit, the credit solutions strategy considers the ethical treatment of end consumers, influencing lending practices and client interactions. In Sienna Real Estate, the property management and development strategy incorporates end consumer perspectives to promote sustainable and responsible real estate practices.

#### Whether and how actual and potential impacts on consumers and/or end-users inform and contribute to adapting the undertaking's strategy and business model

These impacts influence and contribute to the adaptation of Sienna IM's strategy and business model. The insights and rights of end consumers help shape and refine the company's approach across Sienna Gestion, Sienna Private Credit, and Sienna Real Estate, ensuring that the business model remains aligned with ethical standards and consumer rights considerations. This continuous adaptation helps Sienna IM maintain a responsible and sustainable business model that respects and supports its end consumers.

#### The relationship between its material risks and opportunities arising from impacts and dependencies on consumers and/or end-users and its strategy and business model

For Sienna IM, there is no link or dependency between the material risks and opportunities arising from its impacts on end consumers and its strategy and business model for S4.

#### All consumers and end-users who can be materially impacted by undertaking are included in scope of disclosure under ESRS 2

Sienna IM addresses these topics within the ESRS 2 framework.

Sienna IM discloses whether all consumers and/or end-users likely to be materially impacted by the company, including impacts connected with its own operations and value chain, through its products or services, as well as through its business relationships, are included in the scope of its disclosure under ESRS 2. Additionally, Sienna IM provides the required information as specified.

#### Description of types of consumers and end-users subject to material impacts

Sienna IM's client base is composed of institutional investors and third-party distributors.

Sienna IM is a multi-expertise pan-European asset manager, offering investment solutions designed to promote investments solutions with purpose.

Our clients benefit from all the experience and knowledge that Sienna IM's investment professionals have accumulated over many years.

Alongside institutional investors (insurance companies, mutual insurers, pension plan beneficiary, corporations, etc.), Sienna Gestion plays an active role in the growth of employee savings and retirement schemes.

Sienna Private Credit is the Group's expertise focuses mainly on financing real assets and direct lending in four sectors of activity: commercial real estate, the public sector, collateralized corporate financing, and infrastructure (primarily renewable energy).

The Sienna IM Group's Real Estate expertise acquires and manages commercial real estate for clients across Europe. Sienna IM's Real Estate teams position themselves as a long-term strategic partner for local and international investors, advising and accompanying them throughout the entire investment cycle of a property, from the acquisition, to the administration of the asset or property, to the sale process.

Institutional investors account for 53% of Sienna IM's clients; and distributors account for 47%.

## Type of consumers and end-users subject to material impacts by own operations or through value chain

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

## Material negative impacts occurrence (consumers and end-users)

N/A

## Description of activities that result in positive impacts and types of consumers and end-users that are positively affected or could be positively affected

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

## Description of material risks and opportunities arising from impacts and dependencies on consumers and end-users

### Material risks and opportunities

**[IRO 11]:** Risk of lack of transparency and/or clarity in investor information (financial and extra-financial), which could lead to customer dissatisfaction or even sanctions;

**[IRO 12]:** Risk of mismatch between ESG products marketed/subscribed and customer preferences in this area (labels, Taxonomy, ESG themes, etc.);

**[IRO 13]:** Risk linked to Sienna IM's inability to meet ESG due diligence requirements of its institutional or corporate clients (carbon footprint, responsible purchasing policy, HR/diversity policy, etc.);

**[IRO 14]:** Commercial opportunity linked to innovative products (e.g., hybrid assets) and tailor-made solutions, as well as to customer service quality (responsiveness and dedicated tools/platforms);

**[IRO 15]:** Risk of "sustainability washing" (greenwashing, socialwashing and impact washing) on the scale of financial products.

## Disclosure of how understanding of how consumers and end-users with particular characteristics, working in particular contexts, or undertaking particular activities may be at greater risk of harm has been developed

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

## Disclosure of which of material risks and opportunities arising from impacts and dependencies on consumers and end-users are impacts on specific groups

Risks and opportunities presented above.

Sienna IM states that its material risks and opportunities arising from impacts and dependencies on consumers and/or end-users do not pertain to specific groups of consumers and/or end-users (e.g., particular age groups) but apply to all consumers and/or end-users.

## 7.4.4.5.3 Policies to manage material impacts, risks and opportunities related to consumers and end-users

### Policies to manage material impacts, risks and opportunities related to affected communities, including specific groups or all consumers / end-users

*See below*

### Policies in place

#### ESG commitments and responsible practices (Sienna IM)

**Material risks and opportunities related**

[**IRO 12**]: Risk of mismatch between ESG products marketed/subscribed and customer preferences in this area (labels, Taxonomy, ESG themes, etc.) ;

[**IRO 13**]: Risk linked to Sienna IM's inability to meet ESG due diligence requirements of its institutional or corporate clients (carbon footprint, responsible purchasing policy, HR/diversity policy, etc.) ;

[**IRO 15**]: Risk of "sustainability washing" (greenwashing, socialwashing and impact washing) on the scale of financial products.

The DNA of Sienna IM is characterized by acting purposefully to protect the future, which involves full engagement in the development of communities at both the corporate level and the stakeholder level, including investee companies, clients, the territories where investments are made, and the teams.

The role of Sienna IM is to finance the economy directly with a medium to long-term vision, and there is a commitment to the companies in which investments are made. An ambitious CSR strategy has been developed, directed at both Sienna IM and its investee companies. A systematic focus is placed on climate, biodiversity, and DE&I challenges, with efforts made to implement real-life solutions.

To address the risk of ESG commitment misalignment with its institutional investors, Sienna IM deployed an ESG policy, an Exclusion policy and a Biodiversity policy - publicly accessible. Alongside the publication of a transparency PRI report and a sustainability report, these documents serve to provide transparency and ensure that Sienna IM's ESG practices are in line with investor expectations and industry standards.

#### Access to innovative products and services (Sienna IM)

**Material risks and opportunities related**

[**IRO 14**]: Commercial opportunity linked to innovative products (e.g., hybrid assets) and tailor-made solutions, as well as to customer service quality (responsiveness and dedicated tools/platforms)

Being a pioneer in hybrid investment strategies, differentiated investment solutions that combine several asset classes are provided to private investors by Sienna IM. The reconciliation of the need to finance the economy with the need for yield over the medium to long term is facilitated by this innovative approach, which also offers the added benefit of lower volatility. The philosophy underpinning this investment strategy is founded on three pillars: Asset Allocation, Decorrelation, and Diversification.

#### Deals Allocation (Private Credit Expertise)

**Material risks and opportunities related**

[**IRO 11**]: Risk of lack of transparency and/or clarity in investor information (financial and extra-financial), which could lead to customer dissatisfaction or even sanctions ;

Sienna Private Credit Expertise applies strict allocation rules to ensure fairness and transparency when managing investment opportunities across its funds. These rules are supported by a structured allocation process, systematically reviewed by the Compliance team before any decision-making. A predefined set of criteria ensures that all opportunities are allocated in alignment with each fund's investment strategy. The process is further reinforced by internal controls, including regular oversight by dedicated committees, to uphold the integrity of the allocation mechanism and safeguard investor interests.

### Compliance Charter (Sienna Gestion, SPC and Ver Capital):

**Material risks and opportunities related**

**[IRO 11]:** Risk of lack of transparency and/or clarity in investor information (financial and extra-financial), which could lead to customer dissatisfaction or even sanctions ;

**[IRO 12]:** Risk of mismatch between ESG products marketed/subscribed and customer preferences in this area (labels, Taxonomy, ESG themes, etc.) ;

**[IRO 13]:** Risk linked to Sienna IM's inability to meet ESG due diligence requirements of its institutional or corporate clients (carbon footprint, responsible purchasing policy, HR/diversity policy, etc.)

Sienna IM's compliance framework is designed to ensure the highest standards of regulatory adherence and operational integrity. Managed by an independent Compliance team, the framework encompasses proactive measures such as periodic risk assessments, external audits, and real-time monitoring of activities. Compliance-related policies and protocols are regularly updated to reflect the latest regulatory developments, and reports are directly escalated to senior management to maintain full accountability. Each entity within the group has its own compliance charter, ensuring tailored oversight and adherence to specific regulatory requirements. This approach guarantees a seamless alignment between operational practices and legal obligations.

### Conflict of Interest Policy (Sienna Gestion, SPC and Ver Capital):

**Material risks and opportunities related**

**[IRO 11]:** Risk of lack of transparency and/or clarity in investor information (financial and extra-financial), which could lead to customer dissatisfaction or even sanctions ;

**[IRO 12]:** Risk of mismatch between ESG products marketed/subscribed and customer preferences in this area (labels, Taxonomy, ESG themes, etc.) ;

**[IRO 13]:** Risk linked to Sienna IM's inability to meet ESG due diligence requirements of its institutional or corporate clients (carbon footprint, responsible purchasing policy, HR/diversity policy, etc.)

Sienna IM has implemented a robust conflict of interest policy aimed at preventing, identifying, and resolving any potential conflicts that may arise. Each entity within the group has its own conflict of interest policy, ensuring tailored oversight and adherence to specific regulatory requirements. Prior to each investment decision, a systematic process is followed, including mandatory disclosure forms and rigorous internal reviews to identify risks. In cases where a conflict is detected, the concerned individuals are excluded from the decision-making process, and alternative solutions are presented to the relevant committees. All conflicts are documented in a central registry and transparently disclosed to investors through detailed reporting mechanisms.

## Description of key contents of policy

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Description of scope of policy or of its exclusions

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Description of most senior level in organisation that is accountable for implementation of policy

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Disclosure of third-party standards or initiatives that are respected through implementation of policy

N/A - Sienna IM has not engaged any third-party standards or initiatives in the implementation of their policies.

## Description of consideration given to interests of key stakeholders in setting policy

N/A - This is not relevant for Sienna IM's policies because the interests of key stakeholders were not considered in setting the policy.

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

N/A - This is not relevant for Sienna IM's policies because the policy is not made available to potentially affected stakeholders, nor to stakeholders who need to help implement it.

## Description of relevant human rights policy commitments relevant to consumers and/or end-users

N/A

## Disclosure of general approach in relation to respect for human rights of consumers and end-users

Sienna IM has no specific human rights policy commitments relevant to end-users.

## Disclosure of general approach in relation to engagement with consumers and/or end-users

Sienna IM has no specific human rights policy commitments relevant to end-users.

## Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts

Sienna IM has identified no human rights impacts in the DMA; therefore, this data point is considered not material.

## Description of whether and how policies are aligned with relevant internationally recognised instruments

Sienna IM as a responsible company and investor acts in accordance with European and internationals laws, bans, treaties such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

An ESG Policy and an Exclusion Policy - based on international recognised Principles and Guidelines - govern Sienna IM's investment activities.

Policies specific to client relationship management comply with local regulatory requirements determined by local financials authorities.

At Sienna IM, numerous protocols are signed to ensure comprehensive compliance. An exclusion policy is maintained, ensuring that each deal meets the criteria outlined in this policy. Additionally, an annual review of the PAI reporting is conducted by the Chief of Sustainability Officer to verify adherence and accuracy.

## Disclosure of extent and indication of nature of cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve consumers and/or end-users

None

## Reasons for not having adopted policies

Sienna IM has adopted policies and actions with reference to the specific sustainability matters concerned, and therefore, does not need to disclose reasons for not having adopted such policies or actions.

## The undertaking shall provide an accurate cross-reference to identify the aspects of the policy that satisfy the requirements

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

## 7.4.4.5.4 Processes for engaging with consumers and end-users about impacts

### Disclosure of how perspectives of consumers and end-users inform decisions or activities aimed at managing actual and potential impacts

Sienna IM has launched a client questionnaire during the week of October 1, 2024, in order to gauge client satisfaction. The survey consists of carefully crafted questions to capture the clients' investment interests, their engagement with fund management reports, and their preferences for information presentation.

The survey includes:

- **Investment Themes:** clients are asked about their investment allocations across various themes.
- **Engagement with Reports:** the survey seeks to understand whether clients regularly review management reports, rely on SALT LP, contact their commercial correspondent, or do not engage with the reports at all.
- **Information Priorities:** clients are prompted to indicate whether they prioritize financial performance, market insights, management commentary, or other information in the reports.
- **Accessibility and Quality Ratings:** clients are asked to rate the accessibility of information and the overall quality of the fund management reports.
- **Preference for Graphical Information:** the questionnaire explores clients' preferences for graphical versus textual information in the reports.
- **Relevance of Report Content:** clients can provide feedback on whether they find any information in the reports unnecessary.
- **Expectations for ESG Reporting:** the survey inquires whether clients expect additional ESG-specific reports beyond the regulatory requirements.
- **Missing Information:** finally, clients are given the opportunity to highlight any information they believe is missing from the management reports.

The responses to this survey will enable Sienna IM to align its reporting practices with client needs, enhancing the overall client experience.

At Sienna IM, client satisfaction is paramount, and the potential dissatisfaction of end-users can have significant consequences. In the listed segment, if end-users are not satisfied, it can lead to their exit from the fund, impacting overall performance and investor confidence. In the private debt segment, dissatisfied end-users are unlikely to return, which can affect future business opportunities and the sustainability of the investment portfolio. Furthermore, end-users who are not satisfied may choose not to re-invest (RE-UP), leading to a loss of recurring investments and potential growth. Therefore, maintaining high levels of satisfaction among end-users is crucial for the long-term success and reputation of Sienna IM.

### Engagement occurs with consumers and end-users or their legitimate representatives directly, or with credible proxies

Engagement occurs with clients directly and each action of engagement and dialogue is registered in the DealCloud CRM tool. Sienna IM holds weekly and monthly meetings for sales governance. Client interactions are also diligently logged and monitored in our CRM DealCloud.

Sienna IM is committed to its engagement, recognizing the importance of maintaining strong relationships with distributor clients who serve underlying customers. This engagement involves collaborating with third-party distributors, such as insurers and online banks, to address the needs of both the distributors and their aggregated clients. By leveraging the Dealcloud platform as a CRM tool, Sienna IM aims to provide investment solutions that meet the diverse requirements of clients. This approach ensures that both distributor clients and their underlying customers receive effective financial products and services. Through ongoing collaboration and support, facilitated by Dealcloud, Sienna IM seeks to maintain a productive and beneficial relationship with its B2B2C partners.

## Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement

Client engagement occurs at an early stage when the relationship is still considered a prospect. Throughout this preliminary stage, prospects can be contacted by email, phone, digital media or through physical interaction. As a second stage, when prospects become clients, connectivity can take the form of emails, phone calls, team meetings, formal physical meetings, client entertainment. The frequency of client interaction may vary from one client to the next. As a general rule, connectivity with clients is multi-faceted and constant.

In a B2B2C context, connectivity with our end consumer clients remains very marginal.

## Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens and that results inform undertakings approach

The Chief Client Officer of Sienna IM is responsible of operational engagement with clients. Alongside with the sales team, he closely monitors the engagement with clients, systematically registered into DealCloud.

## Disclosure of how effectiveness of engagement with consumers and end-users is assessed

DealCloud

DealCloud is an advanced Customer Relationship Management (CRM) platform tailored for the financial services industry, enabling Sienna IM to track and manage its client relationships and sales processes. It serves as a centralized repository for all client interactions, including emails and calls, ensuring that every touchpoint is recorded and accessible. This comprehensive documentation aids in the systematic follow-up and engagement with clients.

The platform provides detailed analytics, offers breakdowns by country, asset class, and sector for refined client data analysis. This granular approach to data organization allows Sienna IM to segment their client base effectively, enabling targeted marketing strategies and personalized service offerings. It also supports better forecasting and performance tracking, allowing Sienna IM to assess the impact of its efforts across different market segments.

The Dealcloud platform enhances Sienna IM's B2B operations by providing effective traceability with intermediaries. Since Sienna's funds are often included in individual portfolios through intermediated distributions, the platform allows for detailed tracking of interactions and transactions. This traceability is particularly useful in addressing any instances of client dissatisfaction, as it enables Sienna IM to quickly identify and resolve issues. By offering a clear overview of all dealings with intermediaries, Dealcloud helps maintain high service standards and ensures timely resolution of concerns.

## Disclosure of steps taken to gain insight into perspectives of consumers and end-users / consumers and end-users that may be particularly vulnerable to impacts and (or) marginalised

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

## Statement in case the undertaking has not adopted a general process to engage with consumers and/ or end-users

N/A

### 7.4.4.5.5 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

#### Disclosure of general approach to and processes for providing or contributing to remedy where undertaking has identified that it connected with a material negative impact on consumers and end-users

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

#### Disclosure of specific channels in place for consumers and end-users to raise concerns or needs directly with undertaking and have them addressed

Complaints

Sienna IM has a formal process for clients to submit complaints regarding dissatisfaction with the company's services. Complaints, which are not to be confused with general inquiries or service requests, can be addressed to the client's usual account manager or directly to Sienna Gestion's Risk and Compliance Department in Paris for issues related to financial management services or fund valuations. Complaints must not be related to any ongoing legal disputes.

Acknowledgment and response to complaints are aimed to be provided within 10 business days. If a delay occurs, clients are informed that a full response will follow within two months. For unresolved issues or lack of response after 60 days, clients can escalate the matter internally by sending a detailed letter to the Chairman of the Executive Board at Sienna Gestion.

In cases where internal resolution is not satisfactory, clients have the option to seek mediation through the Financial Markets Authority (AMF) Mediator, either online or by mail to the AMF's Paris address.

#### Disclosure of processes through which undertaking supports or requires availability of channels

At Sienna IM, complaints are tracked and managed by the RCCI of Sienna (SPC and Sienna Gestion). Each complaint is systematically logged to ensure proper documentation and follow-up. This process allows for efficient resolution and continuous monitoring, ensuring that all issues are addressed in a timely manner.

#### Disclosure of how issues raised and addressed are tracked and monitored and how effectiveness of channels is ensured

At Sienna IM, the complaints report is reviewed annually to consolidate and monitor all logged complaints, ensuring thorough documentation and follow-up. This process allows for efficient resolution and continuous improvement in addressing client concerns.

#### Disclosure of how it is assessed that consumers and end-users are aware of and trust structures or processes as way to raise their concerns or needs and have them addressed

**Every year, Sienna IM sends to their client base a satisfaction survey. The latest version of this survey was sent in October, 2024. (Please refer to ESRS G1-1)**

#### Policies regarding protection against retaliation for individuals that use channels to raise concerns or needs are in place

**In accordance with Sienna IM whistleblowing policy, protection against retaliation for individuals that use channels to raise concerns or needs are in place. (Please refer to ESRS G1-1)**

#### Statement in case the undertaking has not adopted a general process to engage with consumers and/or end-users

N/A

## 7.4.4.5.6 Action plans and resources to manage its material impacts, risks, and opportunities related to consumers and end-users

### Actions and resources in place

ESG commitments and requirements:

To address the risk of ESG commitment misalignment with its institutional investors, Sienna IM deployed an ESG policy, an Exclusion policy and a Biodiversity policy - publicly accessible. Alongside the publication of a transparency PRI report and a sustainability report, these documents serve to provide transparency and ensure that Sienna IM's ESG practices are in line with investor expectations and industry standards.

Sienna IM acts as a committed player in the sustainable finance ecosystem and participates in numerous international and local initiatives (see above).

#### Transparency:

Sienna IM has established a comprehensive investor platform. This platform is designed to provide detailed and clear information to investors, ensuring that they have access to all necessary financial and ESG data to make informed decisions. By enhancing the transparency and accessibility of information, Sienna IM aims to maintain high levels of investor satisfaction and comply with regulatory standards, thereby reducing the potential for any negative outcomes related to information disclosure.

#### Access to innovative products and services:

Sienna IM's, as a pioneer in hybrid investment strategies, provides private investors with differentiated investment solutions combining several asset classes. Asset hybridisation is an innovative concept at the heart of Sienna IM's multi-expertise business model. In practical terms, it involves combining traditional listed assets with unlisted assets, such as private debt, private equity, infrastructure and property, as part of a strategic allocation.

To date, 3 Sienna IM's hybrid funds exceed €200 m assets under management.

Hybrid funds for retail investors remove the barrier to entry for private assets. These funds are accessible to the vast majority of investors, including those in employee and retirement savings schemes. Traditionally, access to unlisted assets required a significant initial financial commitment or calls for funds spread over several quarters, which meant that they were reserved for institutional investors and the very wealthy. This is what we call the democratisation of real assets, accessible to all with a modular risk/return profile.

The French Green Industry Act, which will allow a proportion of non-listed assets to be included in managed funds, will be a major catalyst for this democratisation, which is already under way. It will enable savings to be channeled into a less carbon-intensive real economy, and to generate a higher return than inflation, exceeding 5% on the most aggressive profile.

No specific action is planned in the future for this topic.

### Disclosure of key action

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

### Description of scope of key action

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

### Time horizon under which key action is to be completed

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

### Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

### Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

It is the first exercise of Sienna IM, hence, there are no prior periods.

### Disclosure of the type of current and future financial and other resources allocated to the action plan

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Current financial resources allocated to action plan (Capex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Current financial resources allocated to action plan (Opex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Future financial resources allocated to action plan (Capex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Future financial resources allocated to action plan (Opex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Description of action planned or underway to prevent, mitigate or remediate material negative impacts on consumers and end-users

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

### Description of action to provide or enable remedy in relation to an actual material impact

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

### Description of additional initiatives or processes with primary purpose of delivering positive impacts for consumers and end-users

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

### Description of how effectiveness of actions or initiatives in delivering outcomes for consumers and end-users is tracked and assessed

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

### Description of approach to identifying what action is needed and appropriate in response to particular actual or potential material negative impact on consumers and end-users

In order to prevent from potential negative impacts on end-users, Sienna IM holds weekly and monthly meetings for sales governance. Client interactions are also diligently logged and monitored in our CRM DealCloud. Within the DealCloud framework, there are sections dedicated to follow-ups and next steps. These sections are equipped with automated notifications which prompt remedial actions and next steps.

### Description of approach to taking action in relation to specific material impacts on consumers and end-users

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

### Description of approach to ensuring that processes to provide or enable remedy in event of material negative impacts on consumers and end-users are available and effective in their implementation and outcomes

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

### Description of what action is planned or underway to mitigate material risks arising from impacts and dependencies on consumers and end-users and how effectiveness is tracked

We have a complaints log and when complaints are deemed material we actively pursue remedial actions until they are solved. Client complaints are systematically tracked using a dedicated complaints log. This log includes detailed information such as the complaint number, client name, date of receipt, subject of the complaint, relevant products or services, any external parties involved, date of response, the response provided (positive or negative), and any identified issues.

### Description of what action is planned or underway to pursue material opportunities in relation to consumers and end-users

**[IRO 14]:** Commercial opportunity linked to innovative products (e.g., hybrid assets) and tailor-made solutions, as well as to customer service quality (responsiveness and dedicated tools/platforms)

Sienna IM has launched the FCPR EverGreen fund, in alignment with the Green Industry Law, with the objective of channeling private assets towards retirement savings. This fund is designed to support sustainable investments, contributing to the green economy while providing long-term benefits for retirement planning. The FCPR EverGreen fund represents an innovative approach to investment, aiming to meet the evolving needs of end clients.

To ensure the successful promotion and adoption of the fund, several campaigns are planned for 2025 in collaboration with distributors. These campaigns will focus on educating potential investors about the benefits of the fund and how it aligns with their retirement goals. By working closely with distributors, Sienna IM aims to reach a broad audience and provide them with a valuable tool for their retirement savings.

### Disclosure of how it is ensured that own practices do not cause or contribute to material negative impacts on consumers and end-users

Sienna IM has identified no material negative impacts relating to end-users in the DMA; therefore, this data point is considered not material.

### Disclosure of severe human rights issues and incidents connected to consumers and/or end-users

Zero cases are reported.

### Disclosure of resources allocated to management of material impacts

Sienna IM has identified no material impacts relating to end-users in the DMA; therefore, this data point is considered not material.

### Reasons for not having adopted actions

Sienna IM has adopted policies and actions with reference to the specific sustainability matters concerned, and therefore, does not need to disclose reasons for not having adopted such policies or actions.

## 7.4.4.5.7 Targets set to manage material impacts, risks and opportunities related to consumers and end-users

### Targets in place

No targets

### Relationship with policy objectives

No targets

### Measurable target

No targets

### Nature of target

No targets

### Description of scope of target

No targets

### Period to which target applies

No targets

### Indication of milestones or interim targets

No targets

### Description of methodologies and significant assumptions used to define target

No targets

### Target related to environmental matters is based on conclusive scientific evidence

No targets

### Disclosure of how stakeholders have been involved in target setting

No targets

### Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data

No targets

### Description of performance against disclosed target

No targets

### Disclosures to be reported if the undertaking has not adopted targets

Sienna IM is a 3-year-old asset management firm. Our Chief Sustainability Officer was recently hired in 2023. In addition, our Chief Client Officer was also hired in 2023. Going forward, internal policies, procedures and corresponding targets will be established.

## 7.4.4.6 Governance Information: Business Conduct

### 7.4.4.6.1 The role of the administrative, management and supervisory bodies

#### Disclosure of role of administrative, management and supervisory bodies related to business conduct

SIM main executive governance bodies is the Management Committee (MANCO). The Manco validates the code of conduct and delegates to one of its governance committee (the Group Risk and Compliance Committee, chaired by SIM's CEO) the definition of Group policies that are implemented at entities level through procedures. The GRCC and the Manco ensure that an appropriate internal control set-up is in place. Controls are implemented on the basis of the "three lines of defense" principle. The first line of defense is made of controls embedded in the operational processes, the second line is composed of teams dedicated to controls (risk and compliance teams) and the third line is the internal audit that ensure the internal control is appropriate to our activities and adequately implemented. Findings of controls or audit are reviewed in entities Risk and Compliance Committees and key findings are reported to the Board of Directors of concerned entities as well as to the Head Office (through the GRCC or to the Management Committee). In case of changes in the Code of Conduct, and a least every three years, the Supervisory body of SIM group (SIM Board of Directors) validates the key principles of SIM's code of Conduct.

#### Disclosure of expertise of administrative, management and supervisory bodies on business conduct matters

Regarding administrative and management supervision of Business conduct matters, and as most of our activities are regulated, we do operate in a strict control environment. Employee must be trained and some "sensitive" functions have to pass specific exams (AMF Certificate for General Management, FO and sales). In addition, individuals in charge of Controls functions (Head of Compliance and Internal Control) have to be agreed by the supervisory body (AMF). The supervisory bodies (Boards and equivalent) are composed of seasoned professionals, well aware of regulations and ethics of Business. Some training (AML/FT for example) are compulsory for employees and Board members in certain countries.

At Sienna IM, trainings are considered only a part of the "expertise" of the management. A compulsory training program designated solely for managers is not in place; instead, trainings are designed for all employees, focusing mainly on cybersecurity and AML/FT. Expertise is more illustrated by experience and the regulatory certifications required to hold certain key functions.

### 7.4.4.6.2 Description of the processes to identify and assess material climate-related impacts, risks and opportunities

#### All relevant criteria used in the process to identify material impacts, risks and opportunities in relation to business conduct matters

The process to identify material impacts, risks, and opportunities in relation to business conduct matters was reviewed during the production of the DMA (see ESRS 2). All relevant criteria, including location, activity, sector, and the structure of the transaction, were considered in this review.

### 7.4.4.6.3 Business conduct policies and corporate culture

#### Policies in place

##### Material IROs related to business conduct

[**IRO 16**] **:** Risk related to non-compliance with Sienna's values and various codes, ESG policies, and ESG processes that govern investments and daily activities (which can manifest as reputational and regulatory risk).

[**IRO 17**] **:** Financial and operational risks related to non-compliance with ethical rules (personal transactions, gift declarations and external functions/mandates, fraud, market manipulation, professional misconduct, or other financial sector laws and regulations, etc.).

[**IRO 18**] **:** Risk related to insufficient AML/CFT due diligence.

[**IRO 19**] **:** Risk related to non-compliance with (i) ESG regulations to which Sienna is subject (SFDR, Art29 LEC, CSRD, PRI, etc.), (ii) supervisors' expectations (AMF), (iii) commitments made by Sienna (PRI, SBTi), and/or (iv) mandate-related requests.

[**IRO 20**] **:** Risk related to the publication of financial reports and information required under existing and developing regulations, with the risk of significant inaccuracies.

[**IRO 21**]**:** Risk related to the general IT environment (including hardware, network, backup systems, software, etc.), the integrity of Sienna's data, and cybersecurity (attempts of fraud and hacking).

Main policies addressing business conduct matters are described within the code of conduct of SIM group (GBL's code of conduct) or within the code of conducts of regulated entities. These codes give clear guidelines (through practical examples) of the group's ethical values in business conduct. It spreads a strong corporate culture at every group level and coherence within the group in terms of corporate culture in general and how to identify and manage potential conflicts of interests in particular. In addition procedures and internal control set-up are in place to enforce these values.

The internal control system and risk cartography identify the main risks and mitigants at SIM Group level. Several other risk cartographies, often driven by regulatory obligations enable a more comprehensive review of risks and their potential impacts as well as mitigants. Control plan is defined in order to monitor and limit aforesaid risks. Findings and exceptions are reviewed in different supervision bodies (at executive level : Risk Committee and Management Committee and, when necessary at governance body level such as Board of Directors). Procedure are in place at "global" level (code of conduct, conflict of interests policy) or at a more "operational" level (AMF/FT, whistleblowing, market abuse prevention, cybersecurity, employee ethics, ....).

## Description of key contents of policy

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Description of scope of policy or of its exclusions

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Description of most senior level in organisation that is accountable for implementation of policy

The policies described by Sienna IM within the framework of this ESRS fully meet these requirements.

## Disclosure of third-party standards or initiatives that are respected through implementation of policy

N/A - Sienna IM has not engaged any third-party standards or initiatives in the implementation of their policies.

## Description of consideration given to interests of key stakeholders in setting policy

N/A - This is not relevant for Sienna IM's policies because the interests of key stakeholders were not considered in setting the policy.

## Explanation of how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

N/A - This is not relevant for Sienna IM's policies because the policy is not made available to potentially affected stakeholders, nor to stakeholders who need to help implement it.

## Description of how the undertaking establishes, develops, promotes and evaluates its corporate culture

Sienna's DNA is to act with purpose to protect the future. Hence, we are fully involved in the development of our communities both at the corporate and at our stakeholder levels: our investee companies, our clients, the territories where we invest, and our teams.

Sienna's role is to directly finance the economy with a medium to long-term vision, therefore, we are committed with the companies we invest in . To do so, we have developed an ambitious CSR strategy directed both at Sienna and at our investee companies. As such, we systematically focus on climate, biodiversity and DE&I (Diversity, Equity & Inclusion) challenges and make our best to implement real-life solutions.

We rely on GBL's code of conduct. Our own code of conduct is work in progress. Our corporate culture liaises on our four corporate values. These values are "Sustainable innovation : we stand out for our ability to innovate with long-term investment solutions that take into account environmental, social and economic challenges", "Client centric : we focus the entirety of our organisation around the customer needs", "cohesion : we collaborate in a spirit of solidarity, whatever our expertise, professions or functions, so that we can build together" and "agility : as a company we are capable of quickly adapting to unforeseen changes and emerging trends while maintaining strategic, operational and human continuity.

### Sienna IM's commitments:

- **Financing the economy :** we focus on supporting the economy by offering a very large array of asset classes;
- **Supporting mid-market projects :** Sienna's private assets expertise continuously accompany the European mid-market projects in their decarbonization journey;
- **Medium to long-term investment :** our objective is to participate to the building of a solid and sustainable economy with a medium to long-term vision;
- **Working for the future :** Sienna's fiduciary duty continuously combines the search for financial performance & ESG impact as both create long term value;
- **Responsible Investments strategic pillars : 4 main pillars :** exclusion, ESG integration, engagement towards businesses and advocacy with public authorities;
- **CSR strategy :** as a responsible company, Sienna wants to fully align its own operation and its investments on behalf of its clients

## Description of the mechanisms for identifying, reporting and investigating concerns about unlawful behaviour or behaviour in contradiction of its code of conduct or similar internal rules

In addition to different rules and policies, and to the internal control set up (described in the "internal control system and risk cartography", issued in October 2023 and that should be updated in 2025), that enable to identify, remedy and/or escalate breaches or inadequate behaviour, SIM Group has put in place a "whistle blowing procedure" at Group Level, that accommodates alerts from internal or external stakeholders through an external dedicated and secured website, guaranteeing strict confidentiality. This policy and the link to dedicated website is available on SIM main website.

### Some examples of rules and procedure hereafter :

#### Conflict of interest policy - Sienna Gestion

In accordance with current regulations, particularly under the General Regulation of the French Financial Markets Authority (AMF), Sienna Gestion has established and maintains an operational policy for the detection and management of conflict of interest situations. This policy is suitable given the size, organization, nature, significance, and complexity of its activities. This procedure specifically includes the following elements: The description of situations that may give rise to a conflict of interest and pose a significant risk of harm to the interests of one or more clients in the context of Sienna Gestion's asset management activities. The procedures and measures to be taken to manage these conflicts.

#### Fraud prevention - Sienna_Gestion

All employees or service providers acting on behalf of Sienna Gestion may encounter fraud cases, regardless of their level of hierarchy or function. The control of internal fraud risk is implemented at the level of information systems: the computer authorization process establishes the chain of responsibilities, priorities, segregation between applications, and prevention of conflicts of interest; dedicated test environments are maintained separate from operations. Workflows within tools allow for inter-service task segmentation and multiple levels of verification (for example, for orders and net asset values). Additionally, accounting procedures and controls are in place to manage the risk of fraud: delegations of authority and signatures, procedures concerning supplier payments, with the DRCCI (Risk, Compliance, and Internal Control Department) also incorporating into its annual control plan the verification of the reliability of bank account settings and the effectiveness of first-level controls. Furthermore, the DRCCI performs ongoing monitoring to control the risk of market abuse; given that this issue can overlap with fraud and money laundering, it is subject to weekly checks by risk managers and a specific policy. However, most frauds are criminal offenses that can lead to prosecution (notably under the criminal classifications of theft, fraud, breach of trust, forgery, and use of forged documents, etc.) and are punishable by imprisonment of 3 to 5 years and a fine of 375,000 euros.

## No policies on anti-corruption or anti-bribery consistent with United Nations Convention against Corruption are in place

At Sienna IM, an anti-corruption/anti-bribery policy consistent with the UN Convention against Corruption is maintained.

A global policy regrouping principles, procedures references, escalation process and mandatory training for all employee is being finalized and should in force in Q1 2025. Please note that several procedures addressing corruption and bribery are already in place in the vast majority of our perimeter as part of the compulsory internal control set up of regulated entities.

## Timetable for implementation of policies on anti-corruption or anti-bribery consistent with United Nations Convention against Corruption

N/A

## Disclosure of safeguards for reporting irregularities including whistleblowing protection

Sienna IM has put in place a "whistle blowing procedure" at Group Level, that accommodates alerts from internal or external stakeholders through an external dedicated and secured website, guaranteeing strict confidentiality. The link to a dedicated website is available on Sienna IM main website in order for every stakeholder to use it if deemed necessary. The full procedure is made available to Sienna's employees on Sienna's intranet.

The referents within the whistleblowing set-up are the General Counsel and the Chief Risk and Compliance Officer that are well informed of the legal framework when handling alerts. Existing measures to protect against retaliation its own workers who are whistle-blowers in accordance with the applicable law transposing Directive (EU) 2019/1937 of the European Parliament and of the Council are included within the whistleblowing policy.

## Details on the establishment of internal whistleblower reporting channels

Sienna IM provides an internal reporting channel for whistleblowers through a secure link available 24/7 from any device. This link is the sole reporting channel for all SIM entities, ensuring that all information, including personal data, is encrypted and stored in a secure, independent environment. Whistleblowers are encouraged to reveal their identity to benefit from legal protection, but they may also choose to remain anonymous and communicate via a secure dialog box.

External reporting channels are also available. In France, whistleblowers can seek certification of their status from the Defender of Rights or report to the AMF through various means, including electronic forms, postal mail, phone calls, or face-to-face meetings. In Luxembourg, independent and autonomous external reporting channels are established by competent authorities such as the CSSF, CAA, ITM, and others. These channels allow for both written and verbal reporting, ensuring that whistleblowers can communicate their concerns effectively.

Public disclosure is strictly regulated under the law. Whistleblowers are protected if they first report internally and externally, or directly externally, and no appropriate action is taken within the legal timeframe. They are also protected if they reasonably believe that the violation poses an imminent or obvious danger to the public interest or if there is a risk of retaliation or insufficient action due to the circumstances of the case. The handling of reports is managed by a designated Referent, who ensures the admissibility and processing of the report, potentially with the assistance of a Reporting Management Committee and a team of investigators and experts.

## Measures to protect against retaliation its own workers who are whistleblowers

The protection of whistleblowers is guaranteed as long as they report, independently, impartially, and in good faith, a fact they have personally witnessed. The disclosure must be “necessary and proportionate to safeguard the interests concerned” and must comply with the procedures and regulations for whistleblowing. If these criteria are met, whistleblowers are not criminally liable for revealing facts, even in cases of banking secrecy. Additionally, whistleblowers cannot be subjected to dismissal, sanctions, or any form of direct or indirect discrimination, particularly regarding their remuneration or career progression.

Whistleblowers, as well as facilitators or third parties, are protected against any form of retaliation as long as they acted in good faith. Any disciplinary action taken due to a report is therefore null and void. Whistleblowers can pursue legal action to annul the disciplinary measure and seek compensation for the harm suffered. They benefit from a presumption of causality; if they prove that they made a report through established channels and suffered a negative consequence, this consequence is presumed to result from retaliation for the report. The employer must refute this presumption by providing distinct, precise, real, and serious reasons justifying the measure. Whistleblowers will not be held responsible for the means used to obtain the disclosed information if they reasonably believe their report is necessary to reveal wrongdoing. However, if they deliberately violated laws and regulations or concealed facts that should have been reported, and did not report independently, impartially, and in good faith, they are exposed to civil and/or criminal prosecution and disciplinary measures. Any pressure exerted on a whistleblower to hinder the reporting of an alert constitutes an offense subject to disciplinary and criminal sanctions.

## No policies on protection of whistleblowers are in place

N/A whistleblowing policy/procedure in place

## Timetable for implementation of policies on protection of whistleblowers

N/A

## Undertaking is committed to investigate business conduct incidents promptly, independently and objectively

All procedures implemented in the group describe the rules and processes, control in place and reporting. In addition the whistleblowing policy describes how an anonymous alert could be raised, should the normal internal control processus not adequately address the issue at stake.

We have procedures to investigate business conduct incidents promptly, objectively and independently.

## Policies with respect to animal welfare are in place

N/A regarding Sienna IM’s activities

## Information about policy for training within organisation on business conduct

Each entity has defined a training plan commensurate to its activities (especially regulated entities have to comply with their applicable regulations). A new training platform has been deployed (skill-up platform). We are currently working on a “compulsory training plan” at Group level with a formal follow up through the Skill-up platform (for example anti-corruption training will be organised for all group’s employee in 2025).

The mandatory training plan for Sienna IM is not yet fully defined at this stage, with targeted implementation planned for the second half of the year. Mandatory trainings are conducted at a minimum every two years on AML/CFT and Cybersecurity (and market abuse for the relevant teams). Furthermore, training on the code of conduct is provided to all new employees upon their onboarding.

## Disclosure of the functions that are most at risk in respect of corruption and bribery

Conflicts of interest policies identify situations (and concerned employees) that could be subject to corruption risk. Main categories of functions concerned are : general management, purchase divisions, investment management teams, sales and marketing teams.

### Reasons for not having adopted policies

Sienna IM has adopted policies and actions with reference to the specific sustainability matters concerned, and therefore, does not need to disclose reasons for not having adopted such policies or actions.

## 7.4.4.6.4 Prevention and detection of corruption and bribery

### Information about procedures in place to prevent, detect, and address allegations or incidents of corruption or bribery

Our anti-corruption / anti-bribery policy is consistent with the UN convention against Corruption and a set of several procedures implementing this policy (for examples: management of conflict of interests, gifts and benefits, whistleblowing, AML/FT, personal transactions, purchase policy …). Every procedure describes rules, controls and reporting/alert process.

#### NORM_Déonto_Sienna_Gestion_07062022

Employees are prohibited from soliciting gifts, benefits, or compensation from third parties with whom Sienna Gestion interacts. Gifts, whether received or given, must adhere to customary business practices, remaining within limits that do not compromise the integrity and impartiality of employees and, conversely, of the professionals with whom Sienna Gestion regularly engages. In cases of uncertainty, the opinion of the DRCCI must be sought. Certain situations warrant the refusal to accept a gift. The value of a gift should not exceed 200 euros. If an employee receives a gift valued at or above this amount, they must first notify the DRCCI and then return the gift to the third party who sent it. Gifts received during the end-of-year holiday season are not kept by the intended recipients; instead, they are pooled for a raffle open to all employees of the management company.

The value of gifts, entertainment, or benefits offered to a client or partner must not exceed 200 euros per person.

#### PROC_DRCCI_LCBFT_Sienna_Gestion_V09022023 - LCB FT

Article L531-36 of the French Monetary and Financial Code entrusts the Financial Markets Authority (Autorité des Marchés Financiers, AMF) with the responsibility of ensuring that asset management companies comply with applicable regulatory obligations.

In this context, Sienna Gestion is required to implement a system for the control and surveillance of suspicious transactions. The AMF General Regulation specifies the conditions for establishing risk assessment and management systems in the area of Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) and defines the internal procedures and control measures that must be implemented by asset management companies.

Sienna Gestion is subject to AML/CTF obligations:

- In relation to the investment services it provides;
- In relation to the marketing, carried out by itself or through a third party, of units or shares of collective investment schemes (OPC) that it manages or does not manage.

### Investigators or investigating committee are separate from chain of management involved in prevention and detection of corruption or bribery

The internal control system, including the control of corruption and bribery risks, is organised on the basis of the “three lines of defense” principle. The first line of defense is made of controls embedded in the operation processes, the second line is composed of teams dedicated to controls (risk and compliance teams) and the third line is the internal audit that ensure the internal control is appropriate to our activities and adequately implemented. Findings of controls or audit are reviewed in entities Risk and Compliance Committees and key findings are reported to the Board of Directors of concerned entities as well as to the Head Office (through the GRCC or to the Management Committee). Potential issues regarding corruption and bribery would be analyzed by the RCCI, or Head of Compliance and Internal Control (for Regulated entity the RCCI is a controlled function by the AMF and reports to the CEO or to the Chairman of the Board), and reported to top management and Board of the entity and to the Chief Risk and Compliance Officer of Sienna IM (SIM) Group. This organization guarantees the independence of control functions (and governance and control committee) from the chain of management involved in the matter.

### Information about process to report outcomes to administrative, management and supervisory bodies

Each Group entity ensures that the anti-corruption / anti-bribery set up effective through the implementation of the controls and an appropriate reporting. Entities’ internal reporting shall comprise a reporting submitted at least annually to the Risk and Compliance Committee (or its equivalent), or to the Management Committee (or Executive Committee) and a report submitted at least annually to the Board of Directors in case any alert identified. The annual report shall be transmitted to SIM’s CRCO as well as an “alert note” for any event of corruption that is detected (at the latest within 5 working days of the detection).

## Disclosure of plans to adopt procedures to prevent, detect, and address allegations or incidents of corruption or bribery in case of no procedure

Sienna IM has a procedure to prevent, detect corruption and/or bribery incidents

## Information about how policies are communicated to those for whom they are relevant (prevention and detection of corruption or bribery)

Procedures are communicated (as well as potential amendment) when recruiting a new employee (permanent, temporary or interns). In addition, all procedures are available on concerned entity intranet. Training program (despite not covering all existing procedures) is also a way to remain trainee of applicable procedures.

Risk Committee. It regularly reports the results of these audits to the Management and the Committee, issuing recommendations when necessary to improve compliance with ethical obligations. The DRCCI also provides advisory and support services to employees.

We communicate the policies and provide training in addition to the regulatory certifications. Furthermore, our teams are largely composed of experienced professionals. Certain trainings, such as those on cybersecurity, conclude with a quiz that requires a minimum score for the training to be considered complete. This ensures that the audience fully understands the implications of the policies.

## Information about nature, scope and depth of anti-corruption or anti-bribery training programmes offered or required

The new general policy regarding bribery and corruption implements a mandatory training for all employees of the Group. This compulsory training for all employees (and not only directly concerned functions) is planned for Q3 2025.

## Percentage of functions-at-risk covered by training programmes

0.00 %

## Information about members of administrative, supervisory and management bodies relating to anti-corruption or anti-bribery training

No training was given in 2024 on business conduct topics.

## Disclosure of key action

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

## Description of scope of key action

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

## Time horizon under which key action is to be completed

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

## Description of key action taken, and its results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts

The actions described by Sienna IM within the framework of this ESRS fully meet these requirements, if relevant.

## Disclosure of quantitative and qualitative information regarding progress of actions or action plans disclosed in prior periods

It is the first exercise of Sienna IM, hence, there are no prior periods.

## Disclosure of the type of current and future financial and other resources allocated to the action plan

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Current financial resources allocated to action plan (Capex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Current financial resources allocated to action plan (Opex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Future financial resources allocated to action plan (Capex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Future financial resources allocated to action plan (Opex)

N/A - The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### Reasons for not having adopted actions

Sienna IM has adopted policies and actions with reference to the specific sustainability matters concerned, and therefore, does not need to disclose reasons for not having adopted such policies or actions.

## 7.4.4.6.5 Incidents of corruption or bribery

### Action plans and resources to manage its material impacts, risks, and opportunities related to corruption and bribery

Regulated entities within SIM group have developed a comprehensive set of procedures and controls, based on a risk cartography to assess and control corruption and bribery risks. Despite not being within the Scope of "loi Sapin II", such procedures are requested by the regulation addressing investment management activities. A compulsory training for all employees will be implemented in 2025. As a result of this set-up, we did not face incidents of corruption or bribery, nor were convicted (or subject to any fine) linked to a violation of anti-corruption or anti-bribery laws.

At Sienna IM, the resources dedicated to controls are primarily composed of the RCCI (Head of Compliance and Internal Control) and their compliance team. Including the relevant personnel, approximately 7 to 8 individuals are involved, covering all risk and compliance topics.

### Number of convictions for violation of anti-corruption laws

0

### Number of convictions for violation of anti-bribery laws

0

### Amount of fines for violation of anti-corruption laws

0.00 EUR

### Amount of fines for violation of anti-bribery laws

0.00 EUR

### Prevention and detection of corruption or bribery - anti-corruption and bribery training

0.00%

### Number of confirmed incidents of corruption or bribery

0

### Information about nature of confirmed incidents of corruption or bribery

N/A, no confirmed incidents of corruption or bribery identified.

### Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents

0

### Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery

0

### Information about details of public legal cases regarding corruption or bribery

N/A

### Methodologies and significant assumptions behind the metric

Sienna IM doesn't have a dedicated system to monitor this type of incident. And such incidents have not occurred. Internal processes ensure that any such incidents would be reported to the relevant governance bodies and discussed during control committee meetings. No incidents of this kind have been reported. For the purpose of CSRD reporting, the RCCI of the concerned entities was asked to confirm that no such incidents occurred, and this was confirmed.

### Metric is validated by an external body other than the assurance provider

No external body validation for these metrics. **Label and define the metric using meaningful, clear and precise names and descriptions**

Sienna IM doesn't have a dedicated system to monitor this type of incident. And such incidents have not occurred. Internal processes ensure that any such incidents would be reported to the relevant governance bodies and discussed during control committee meetings. No incidents of this kind have been reported. For the purpose of CSRD reporting, the RCCI of the concerned entities was asked to confirm that no such incidents occurred, and this was confirmed.

### When currency is specified as the unit of measure, use the presentation currency of its financial statements

Sienna IM doesn't have a dedicated system to monitor this type of incident. And such incidents have not occurred. Internal processes ensure that any such incidents would be reported to the relevant governance bodies and discussed during control committee meetings. No incidents of this kind have been reported. For the purpose of CSRD reporting, the RCCI of the concerned entities was asked to confirm that no such incidents occurred, and this was confirmed.

## 7.4.4.7 Entity Specific information: ESG integration

### 7.4.4.7.1 Introduction

Sienna IM ESG strategy is built upon four foundational pillars, each contributing to a comprehensive and responsible investment approach:

1. Exclusions: Sienna IM enforces both normative and sectorial exclusions, setting clear boundaries for its investment universe by avoiding assets associated with significant sustainability risks or negative impacts on sustainability factors.
2. ESG Integration: ESG considerations are embedded into every stage of the investment process at Sienna IM. This integration ensures that environmental, social, and governance factors are systematically considered in investment analysis and decision-making, reflecting the firm's commitment to responsible investing.
3. Engagement: Active dialogue with the companies in which Sienna IM invests is a central component of its ESG strategy. Through engagement, Sienna IM seeks to influence corporate behavior and encourage improvements in ESG practices, thereby enhancing long-term value for stakeholders.
4. Advocacy: Sienna IM actively advocates for responsible, long-term investment approaches within the financial services sector and among its stakeholders. The firm leverages its influence and expertise to promote sustainable practices and policies that align with its commitment to responsible stewardship and the broader objectives of sustainable development.

## 7.4.4.7.2 Policies

### ESG policy

**Material IROs :**

[**IRO 22**] **:** Opportunity for outperformance due to ESG criteria consideration of ESG criteria in Sienna's activities and investments.

[**IRO 23**] **:** Risk associated with management of ESG data (directly from companies or data providers).

[**IRO 24**] **:** Financial, legal and/or reputational risk due to relationships with invested companies that have negative environmental, social and/or governance impacts.

[**IRO 25**] **:** Opportunity to advance the issues of sustainable finance with the companies invested in (voting and commitment) and with NGOs and public authorities (advocacy).

The ESG policy of Sienna IM aims to define the strategy and governance for integrating environmental, social, and governance considerations at the heart of Sienna's activities.

The purpose of this ESG and Responsible Investment Policy is to explain the strategy, policy and governance in place to integrate ESG considerations into Sienna's business. It describes the company's commitments and guidelines for implementing the three ESG pillars. With this ESG policy, Sienna provides a clear framework to which all Group companies can refer in their various policies, integration approaches ESG policies, integration approaches, objectives and ambitions.

This policy articulates the company's commitments and the directions taken for the implementation of the three ESG pillars. It serves as a framework of reference for all group companies, complementing the Corporate Governance Charter, the Code of Conduct, the Diversity and Inclusion Policy, and the Exclusion Policy.

The ESG Policy is applicable to all entities within Sienna IM and is publicly available on Sienna IM's website.

Communicated to the Board of Directors in December 2022, the ESG Policy is subject to a triennial review to ensure its relevance and effectiveness.

Sienna IM has not engaged any third-party standards or initiatives in the implementation of the ESG Policy.

The interests of key stakeholders were not considered in setting the ESG Policy.

### Exclusion policy

**Material IROs :**

[**IRO 22**] **:** Opportunity for outperformance due to ESG criteria consideration of ESG criteria in Sienna's activities and investments.

[**IRO 23**] **:** Risk associated with management of ESG data (directly from companies or data providers).

[**IRO 24**] **:** Financial, legal and/or reputational risk due to relationships with invested companies that have negative environmental, social and/or governance impacts.

Sienna IM's Exclusion Policy includes both normative and sectoral exclusions. Normative exclusions are based on controversial behaviors and legally mandated exclusions, adhering to frameworks such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises. Sienna excludes investments in organizations involved in severe violations of these principles and in controversial jurisdictions listed under EU sanctions.

Sectoral exclusions cover controversial weapons, pornography, tobacco, and fossil fuels. Sienna excludes investments in organizations directly involved in the development, production, maintenance, and trade of controversial weapons, as defined by international conventions. The policy also excludes investments in organizations involved in the production of pornographic content, prostitution, and sex industries, the tobacco industry; and companies involved in thermal coal and unconventional oil and gas activities.

Other exclusions may be applied at the fund or mandate level due to specific client requests, fund positioning, or label requirements. Industries with potential exclusions, such as palm oil, gambling, GMOs, or deforestation, are evaluated on a case-by-case basis by Sienna's ESG research professionals. While the Exclusion Policy is intended to be applied without exception, any proposed exceptions must be thoroughly documented and approved by the Asset Class General Manager and the ESG Strategic Committee, with continuous monitoring and annual reevaluation. The compliance of the existing portfolio with the Exclusion Policy is reviewed annually.

The Exclusion Policy is applicable to all entities within Sienna IM and is publicly available on Sienna IM's website.

First communicated to the Board of Directors in December 2022, the Exclusion Policy is subject to a triennial review to ensure its relevance and effectiveness. It was reviewed in 2024 and validated by Sienna IM's Management Committee.

Sienna IM has not engaged any third-party standards or initiatives in the implementation of the Exclusion Policy.

The interests of key stakeholders were not considered in setting the Exclusion Policy.

## Biodiversity policy

### Material IROs :

**[IRO 22] :** Opportunity for outperformance due to ESG criteria consideration of ESG criteria in Sienna's activities and investments.

**[IRO 23] :** Risk associated with management of ESG data (directly from companies or data providers).

**[IRO 24] :** Financial, legal and/or reputational risk due to relationships with invested companies that have negative environmental, social and/or governance impacts.

The biodiversity policy aims to transparently integrate biodiversity into key stages of investment processes and operations. It is recognized that the sustainability of investments is closely linked to the health of ecosystems. This policy reflects a commitment to proactive and responsible environmental management.

Awareness is raised, stakeholders are engaged, and comprehensive biodiversity assessments are incorporated into investment processes to mitigate risks and actively contribute to biodiversity preservation.

Efforts are made to minimize the environmental footprint, encourage biodiversity-friendly practices among clients and partners, and comply with international frameworks and regulatory requirements such as IPBES, COP15, SFDR, EU Taxonomy, and Article 29 of the Energy-Climate Law.

The Biodiversity Policy is applicable to all entities within Sienna IM and is publicly available on Sienna IM's website.

The Biodiversity Policy was validated by the Management Committee in December 2023.

Sienna IM has not engaged any third-party standards or initiatives in the implementation of the Biodiversity Policy.

The interests of key stakeholders were not considered in setting the Biodiversity Policy.

## Climate roadmap

This climate roadmap is described in the ESRS E1.

## Engagement policy

### Material IROs :

**[IRO 25] :** Opportunity to advance the issues of sustainable finance with the companies invested in (voting and commitment) and with NGOs and public authorities (advocacy).

The Engagement Policy defines shareholder engagement as the practice of influencing corporate conduct and strategy with a focus on ESG issues. The policy emphasizes the necessity for companies to enhance their ESG practices within a structured framework that entails direct dialogue and sustained oversight. Sienna IM's engagement objectives are to:

- Propel companies towards improved ESG practices and adherence to international standards, particularly concerning climate change and social responsibilities.
- Motivate issuers to assess their non-financial performance, thereby gauging the impact of their operations.
- Advocate for increased corporate transparency regarding ESG considerations.

The Engagement policy is applicable to Sienna Gestion. The engagement policy is validated by the Executive Board of Sienna Gestion.

The Engagement Policy is publicly available on Sienna IM's website.

Sienna IM has not engaged any third-party standards or initiatives in the implementation of the Engagement Policy.

The interests of key stakeholders were not considered in setting the Engagement Policy.

### 7.4.4.7.3 Actions

Despite the comprehensive policies established, Sienna IM has also implemented a multitude of cross-cutting ESG initiatives. These actions demonstrate Sienna IM's commitment to integrating sustainable practices throughout its operations, transcending traditional policy frameworks to ensure a holistic approach to environmental, social, and governance issues. By fostering collaborative efforts across various departments and leveraging the expertise of specialized teams, Sienna IM ensures that ESG considerations are woven into the fabric of its corporate culture and investment strategies, reinforcing its position as a leader in responsible investing.

#### Sienna IM acts as a committed player in the sustainable finance ecosystem.

Advocacy is of utmost importance for Sienna. As such, Sienna is part of several French, European and international initiatives. The full list is available on Sienna's website.

In 2015, Sienna IM made an official commitment to responsible investment by becoming a signatory to the Principles for Responsible Investment (PRI), a voluntary international initiative launched in 2006.

Adhering to the PRI involves the application of six principles:

- We will incorporate ESG issues into investment analysis and decision-making processes.
- We will be active owners and incorporate ESG issues into our ownership policies and practices.
- We will seek appropriate disclosure on ESG issues by the entities in which we invest.
- We will promote acceptance and implementation of the principles within the investment industry.
- We will work together to enhance our effectiveness in implementing the principles.
- We will each report on our activities and progress towards implementing the principles.

The adhesion to PRI is renewed every year. Sienna IM completes, when requested, the reporting and assessment questionnaire of the PRI to measure its progress against the 6 Principles. The result of the assessment can be found on Sienna's website.

Moreover, specific Sienna IM's funds are certified by publicly recognized labels (such as the French SRI label or the Greenfin label), which attest to the company's adherence to rigorous ESG investment criteria and its focus on environmentally friendly financial products. Sienna IM responded to public consultations on strengthening label criteria.

Sienna IM does not have material impacts on the entity specific ESRS.

No prior information was disclosed.

The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

#### Global and Local Responsible Investment Initiatives of Sienna IM

Sienna IM also participates in other numerous international initiatives such as the UN Global Compact (UNGC), the Carbon Disclosure Project (CDP), the TaskForce on Climate-related Financial Disclosures (TCFD), the TaskForce on Nature-related Financial Disclosures (TNFD), SBTi, but also numerous local initiatives. The detailed list of these initiatives is published on Sienna IM's website.

In January 2024, Sienna IM made a commitment to the Science Based Targets initiative (SBTi), pledging to establish scientifically grounded short-term goals for reducing greenhouse gas emissions within the next two years. This endeavor aligns with the objective of achieving a net-zero scenario by 2050 at the latest, in an effort to limit global warming to a maximum of +1.5°C.

The SBTi is a climate action organization that empowers companies and financial institutions globally to actively engage in combating the climate crisis. Through its rigorous methodologies and criteria, the SBTi guides and supports participants in setting and achieving ambitious emission reduction targets consistent with the latest climate science.

Sienna IM is actively engaged in enhancing responsible investment practices across France, participating in key national initiatives. The firm's commitment is evidenced by its membership in the AFG's Responsible Investment Commission, France Invest's diversity and impact declarations, and the sustainable development club. Sienna IM also collaborates with the French Sustainable Investment Forum (FIR) and the Institute for Sustainable Finance, contributing to impactful working groups and endorsing established definitions of impact. Additionally, Sienna IM's private debt expertise is a longstanding member of the Institute of Financial Professions and the Sustainable Real Estate Observatory (OID), and its listed assets expertise belongs to the solidarity-focused association FAIR.

Sienna IM does not have material impacts on the entity specific ESRS.

No prior information was disclosed.

The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

#### Engagement at Sienna IM

Sienna IM also participates to collaborative engagement on climate related issues (FIR - "Say on Climate" investor campaign, Climate action 100+); biodiversity-related issues (Finance for Biodiversity Pledge and Finance Statement on Plastic Pollution); and diversity-related issues (Club 30 France).

The Engagement Policy defines shareholder engagement as the practice of influencing corporate conduct and strategy with a focus on ESG issues. The policy emphasizes the necessity for companies to enhance their ESG practices within a structured framework that entails direct dialogue and sustained oversight. Sienna IM's engagement objectives are to:

- Propel companies towards improved ESG practices and adherence to international standards, particularly concerning climate change and social responsibilities.
- Motivate issuers to assess their non-financial performance, thereby gauging the impact of their operations.
- Advocate for increased corporate transparency regarding ESG considerations.

This engagement is seen as a concrete action that supplements SRI analysis, aiming to significantly improve the management of ESG risks and opportunities. The policy categorizes engagement as either reactive or proactive.

Sienna IM's commitment to its Engagement Policy culminates in the publication of an annual engagement report. This report comprehensively catalogs the outcomes of the firm's engagement activities, detailing the progress and developments made by companies in enhancing their ESG practices. It serves as a testament to Sienna IM's proactive and reactive engagement efforts, providing transparency and accountability for the firm's responsible investment strategy.

The pursuit of long-term performance in Sienna IM's investments is also achieved through the support and education of invested companies. Sienna IM's engagement strategy is realized through dialogue with companies and engagement actions, primarily within the framework of collective initiatives. These actions aim to impact companies by encouraging them to better address the ESG challenges they encounter.

Sienna AM France operates within the private debt sector, which differs from asset management companies focused on publicly traded securities. As a lender rather than a shareholder, Sienna AM France does not have the option to buy or sell securities, limiting its ability to employ traditional escalation processes used in engagement strategies. The firm cannot exert influence through voting or submitting resolutions, nor can it reduce or sell its position. Its influence is primarily exerted during the transaction setup, where it must commit to the loan's maturity.

Despite these constraints, Sienna AM France engages with borrowers in line with its lending activities. The majority of transactions (approximately 80%) are bilateral deals, allowing for in-depth initial dialogue with the borrower. During the transaction setup, Sienna AM France ensures the borrower commits to providing annual ESG data. Additionally, for impact funds developed by Sienna AM France, the firm includes Sustainability Linked Loan (SLL) clauses when possible. These clauses result from detailed discussions with the borrower and require them to meet predefined, business-related indicators. They are stringent and may include interest rate increases as sanctions for failing to meet the targets.

Sienna IM does not have material impacts on the entity specific ESRS.

No prior information was disclosed.

The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

## Voting activities at Sienna IM

Sienna Gestion is committed to voting on shares held in its portfolio, regardless of the number of shares owned. Due to cost considerations, voting will primarily be exercised for companies headquartered in France. Voting on foreign shares will be limited to the most significant positions in the portfolio and will only apply to assets held with our custodians, CACEIS and BNP Paribas Securities Services.

For French shares, voting is conducted directly and is not delegated to a proxy advisory firm. For foreign shares, Sienna Gestion utilizes the services of the proxy advisory firm ECGS (Expert Corporate Governance Services). Sienna Gestion does not engage in securities lending for the shares in its portfolio and is therefore not affected by the issue of repatriating lent securities during general meetings. The firm tailors its analysis to specific situations in the best interest of the shareholder, fund unitholder, or investor under a management mandate with Sienna Gestion. Sienna Gestion supports the principle of "one share-one vote-one dividend."

Furthermore, Sienna Gestion is transparent in its commitment to responsible investment practices by publishing its voting and engagement reports online on its website. This allows stakeholders to access and review the firm's active participation in corporate governance and its efforts to influence ESG practices.

Sienna IM does not have material impacts on the entity specific ESRS.

No prior information was disclosed.

The implementation of this action plan for Sienna IM does not require significant Opex and / or Capex

### 7.4.4.7.4 Metrics and targets

No metrics and targets were implemented in the 2024 exercise of Sienna IM, on the Entity specific section.

Sienna IM expects that all targets set within the entity-specific sectors will be adopted. The timeframe for setting these targets is currently being determined.

This is the first exercise for Sienna IM, and the sectoral standards for asset managers are still awaited. Therefore, the effectiveness of policies and actions in relation to the material sustainability-related impact, risk, and opportunity is not yet tracked.

## 7.4.5 Appendix V - Imerys

The sustainability statement of Imerys, as presented in this Appendix of GBL's consolidated sustainability statement, needs to be read together with Imerys' Annual Report FY2024 which can be found on **Publications | Imerys**. It should be noted that responsibility connected with the content of Imerys' Annual Report remains with Imerys and that the information on this website does not form part of, and is not incorporated by reference into, this sustainability statement.

# PART 1 SUSTAINABILITY REPORT [CSRD]

## 1.1. An integrated approach to sustainability [ESRS 2]

### 1.1.1. General information related to the Sustainability Statement

#### 1.1.1.1. General basis for preparation [BP-1]

The Group's sustainability reporting has been prepared on a consolidated basis, and covers all the activities over which it exerts operational control, referring to the same scope as the financial statement presented in chapter 6 of the Universal Registration Document. It includes each legal entity owned by Imerys and fully consolidated (i.e. Imerys directly or indirectly owns 50% or more interest with operational control) and the reporting structure generally mirrors the business and finance organizations as well as the Group's legal structure. Furthermore, legal entities are normally split into various sites for the relevant indicators. Some exceptions described hereafter are occasionally made to this general framework to accommodate special operational circumstances. Policies and guidelines exist at the Group level to regulate the collection of environmental and social data from the Group's operations.

The Group's sustainability reporting includes information on the material impacts, risks and opportunities related to the Group's operations and connected with Imerys through its direct and indirect business relationships in the upstream and downstream value chain following the outcome of the materiality assessment.

#### 1.1.1.2. Disclosures in relation to specific circumstances [BP-2]

**Reporting obligations and frameworks**

Imerys sustainability report has been prepared as part of the first application of the legal and regulatory requirements following the transposition of the European directive on the publication of corporate sustainability information (Corporate Sustainability Reporting Directive) ("CSRD Directive") and in accordance with the ESRS issued by the European Financial Reporting Advisory Group (EFRAG) and adopted by the European Union for the reporting period from January 1, 2024 to December 31, 2024. This consolidated sustainability report has been prepared under the responsibility of the Management and approved and authorized for issue by the Board of Directors.

The Group sustainability program and reporting approach is coherent with frameworks such as the International Financial Reporting Standards (IFRS), the Financial Stability Board Task Force on Climate-related Financial Disclosures (TCFD) recommendations, the Sustainability Accounting Standards Board (SASB) standards for Metals and Mining, the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines ("Core" option), the UN Global Compact, the UN Guiding Principles on Business and Human Rights, Organization for Economic Co-operation and Development (OECD) Guidelines, International Organization for Standardization (ISO) 26000 and the International Labour Organization (ILO) Fundamental Conventions.

In addition, Imerys' Group Sustainability Statement relies on information published in accordance with article L. 225-102-1 of the French Commercial Code requiring the publication of a Vigilance Plan setting out the reasonable measures of vigilance put in place within the Group to identify risks of and prevent severe impacts on human rights, fundamental freedoms, human health and safety and the environment resulting from the activities of the Group, its subsidiaries and its subcontractors and suppliers, in France and abroad. The Vigilance Plan is presented in Part II of the present chapter.

**Time horizons definition**

The Group's sustainability reporting includes information based on defined time horizons as described in the following table. Time horizons on Climate change disclosure are aligned with the stress test on the risks and opportunities scenario analysis presented in [ESRS E1] of the present chapter, which covers transition risks (industrial risks, market-related risks and opportunities) as well as physical risks.

| Time horizon | Climate Change | All other themes |
|---|---|---|
| Short-term horizon | From the reporting period to 2030 | Reporting period |
| Medium-term horizon | From 2030 to 2040 | From the reporting period to five years |
| Long-term horizon | From 2040 to 2050 | More than five years from the reporting period |

## Uncertainties related to first implementation of ESRS standards

This first year of implementing the CSRD Directive is characterized by many uncertainties. In addition to those inherent in the state of scientific or economic knowledge and the quality of external data used, several interpretations of the texts remain, for which further clarifications from standard-setting or regulatory bodies are expected, particularly regarding the sectoral application standards of the ESRS or the application of the technical criteria of the Taxonomy Regulation.

Thus, the preparation of the sustainability report is based on the knowledge, data, normative interpretations, and information available at its preparation date. Imerys may improve its understanding of the requirements of the ESRS standards when additional recommendations, interpretations and/or market positions become available regarding their implementation.

The Group's double materiality has been performed using data available at the time of the assessment. Over the coming years, the Group expects to see improvements in data quality, coverage and availability, driven by increased reporting and disclosure obligations, and as such Imerys intends to extend the scope of the assessment to cover downstream activities and further positive impacts.

### Sources of estimation and outcome uncertainty

When preparing the sustainability statement, Imerys makes a certain number of estimates and judgments regarding the recognition and measurement of impacts, risks and opportunities. Certain quantitative indicators, notably Scope 3 GHG emissions and water indicators, are subject to measurement uncertainty due to the limitations in industry standard estimation methodologies, numerical modeling and the available and quality of data, including the reliance on third-party data. As methods and data sources may evolve, some figures may become outdated, and updates to methodologies and assumptions might lead to different results or conclusions. The disclosure requirement [MDR-M] of the present chapter details data collection processes, assumptions and calculation methodologies of the indicators provided within this report.

The Group's transition plan for climate change mitigation explains past, current, and future efforts to align its strategy and business model with a sustainable economy. Setting climate-related targets and implementing actions require forward-thinking and long-term planning. Future projections are based on current understanding, expectations, and estimations, and carry uncertainty due to evolving scientific knowledge, emerging methodologies, differing standards, future market conditions, and technological advancements. These assessments will evolve and should not be seen as projections of future performance.

### Data points partially or not available

As of December 31, 2024, some metrics are not or only partially disclosed, notably related to:

Metrics related to pollutants [ESRS E2]: in the European Pollutant Release and Transfer Register (EPRTR) and pinpointing sites that exceed EPRTR thresholds, which may differ from the legal thresholds applicable to Imerys locations worldwide. In 2025 the group will work to enhance the reporting processes for all identified pollutants and improve their quantification to ensure comprehensive and accurate disclosure. For this first year of reporting, the published indicators are therefore limited to NOx and SOx emissions.

Recyclability of mining waste and mineral products [ESRS E5]: The disclosure requirement highlights the lack of comprehensive data regarding the recyclability of mining waste and mineral products. Imerys will pursue its coordinated efforts with relevant stakeholders to assess progress in the recyclability of mining waste and mineral products.

Metrics related to biodiversity and ecosystems [ESRS E4]: This disclosure requirement is more complex than other ESRS due to the broad scope, interconnected nature, and the challenges in data collection and measurement. Imerys has implemented an approach to prioritizing its operational sites based on their potential ecological impact, leveraging the comprehensive mapping of ecological contexts. In 2025, the Group will finalize the quantification of surface areas of the sites in or near protected areas or key biodiversity areas.

Supplier payment terms [ESRS G1-6]: Given the ongoing deployment of a new consolidated supplier solution starting in 2024, Imerys has not been able to disclose the percentage of supplier payments aligned with standard payment terms as required by ESRS G1. This indicator will be developed in order to be monitored within the next few years.

Imerys is committed to addressing these issues through ongoing analysis, enhanced stakeholder engagement, and the deployment of new data solutions, aiming for more comprehensive reporting on these topics in subsequent years.

## Value chain estimation

Scope 3 greenhouse gas (GHG) emissions are calculated by multiplying activity data by specific emission factors. The GHG Protocol outlines recommended Scope 3 calculation methods. Each method corresponds to a certain level of precision and the minimal requirements depend on the level of materiality assessed for each emission category. Within a GHG emissions category, several approaches can be used for subcategories:

- Spend-based: a combination of primary activity data on the amount spent on purchased products and secondary emission factors for purchased products per monetary value. The spend-based methodology is generally the least specific and accurate of the calculation methods used by Imerys.
- Average data (physical unit) method: this methodology results from a combination of primary activity data on the mass or quantity of products purchased by Imerys (e.g. kg, MWh) and secondary emission factors for purchased products per unit.
- Distance-based: to calculate emissions linked to the transport in the value chain, Imerys identified the mass, the distance, and the mode of transport, and subsequently applied the appropriate mass-distance emission factors for the vehicles used.
- Hybrid method: this methodology results from a combination of supplier-specific activity data (when available) and secondary data to fill in the gaps. It has not been used in the mapping.
- Supplier-specific method: this methodology results from a combination of primary activity data on the mass or quantity of purchased products from specific suppliers and primary product and supplier-specific emission factors per unit. Supplier-specific is considered as the most specific and accurate methodology.

## Scope accommodation related to special circumstances

The scope of the environmental disclosure integrated from [ESRS E1] to [ESRS E5] of the present chapter includes all mining and production assets/facilities operated by Imerys. The term “assets operated by Imerys” excludes commercial activities, sales and administrative offices, and projects on customers’ sites.

The newly-acquired operations are included with a delay into the Imerys Health and Safety reporting system, to allow enough time for the concerned operations to integrate the Imerys Health and Safety System and to follow its integration process as per the Integration of new acquisitions policy[1]. The newly acquired company Chemviron dated 31.12.2024 is excluded from the consolidated figures. This exception does not materially impact the results and overall performance presented in the present report. All other material sustainability information relating to companies acquired in 2024 is included in this Sustainability Statement.

## Incorporation by reference

Some of the information required by the CSRD is incorporated by reference in accordance with ESRS 2, to provide greater readability, avoiding redundancies, and ensure the overall cohesiveness of the reported information. Therefore, details on the Group’s Sustainability Statement appear in the four following chapters of this Universal Registration Document:

- **Chapter 1** presents the Imerys Group, its business model, its value chain and its Purpose, Vision and Values;
- **Chapter 2** provides detailed information on risk factors and internal controls of the Group;
- **Chapter 3, Part I** is the Sustainability Statement, describing the Group’s sustainability policies, objectives, targets and performance;
- **Chapter 3, Part II** is the Vigilance Plan in which the Duty of Care mapping used in the double materiality assessment is described.
- **Chapter 4** details the Corporate governance structure and role of administrative, management and supervisory bodies.

The complete overview of the Sustainability Statement structure following the ESRS and the list of disclosure requirements are available in disclosure requirement [IRO-2] of the present chapter.

1 The delay for including such operations in the reporting is up to January 1st of the following calendar year after the 12 months of integration period.

## Specific circumstances in 2024

In 2024, the Group experienced significant events which affected the present Sustainability Statement:

- Implementation of CSRD reporting requirements leading to the publication of new indicators underlined within this chapter by the mention "NEW";
- Appointment of two statutory auditors to perform the external verification over the Sustainability Statement (refer to section 1.8 of the present chapter for the auditors' limited assurance report);
- Major update of the double materiality assessment (refer to disclosure requirements [IRO-1] and [SBM-3] of the present chapter) leading to the definition of three new objectives (refer to section 1.1.4.2, paragraph "Objectives and performance" of the present chapter)
- Publication of Imerys Climate transition plan (refer to [ESRS E1-1] of the present chapter);
- Divestiture of assets serving the paper market in June (refer to Chapter 6, "Significant events 2024" of the Universal Registration Document for additional information related to 2024 acquisitions and divestitures).

## Changes in preparation or presentation of sustainability information

- As mentioned in the paragraph above, the implementation of CSRD reporting requirements in 2024 led to:
  - The publication of new indicators for which the historical performance is therefore not available (underlined within this chapter by the mention "NEW");
  - The maintenance or new publication of 'entity-specific' indicators, that is, indicators developed by Imerys to monitor the Group's performance, in order to answer disclosure requirements related to actions and resources;
- Furthermore, the new indicators related to significant Capital Expenditure (Capex) and Operating Expenditure (Opex) required for the implementation of action plans were deployed after the divestiture of the assets serving the paper market in June and do not include the performance and reporting of these assets.
- The indicators that rely on calculation involving the number of sites are dated 31.12.2024, which means excluding the sites sold during the year, and the newly acquired sites of Chemviron company.

## GHG emission recalculation policy

In order to accurately track progress towards the Group's greenhouse gas emission targets, the base year emissions inventory may be recalculated in case of a recalculation event, as defined below, driving a significant increase/decrease[1] in emissions:

- a significant structural change in the organizational or operational scope as a result of an acquisition, a merger, a demerger or other restructuring, an amalgamation, a consolidation, a spin-off, a disposal or a sale of assets;
- An amendment to any applicable laws, regulations, rules, guidelines and policies relating to the business of the Group and relevant to greenhouse gas emissions, if such amendment has a significant impact on the level of the base year emissions or targets;
- A change of methodology for the calculation of greenhouse gas emissions, including to reflect changes in market practice or relevant market standards, including updated emission factors, improved data access or updated calculation methods or protocols, if such amendment has a significant impact on the level of the base year emissions or targets;
- Discovery of a significant error, or a number of cumulative errors that together are significant.

These recalculation principles apply to the other environmental topics included in this report.

## Limited assurance over the Sustainability Statement

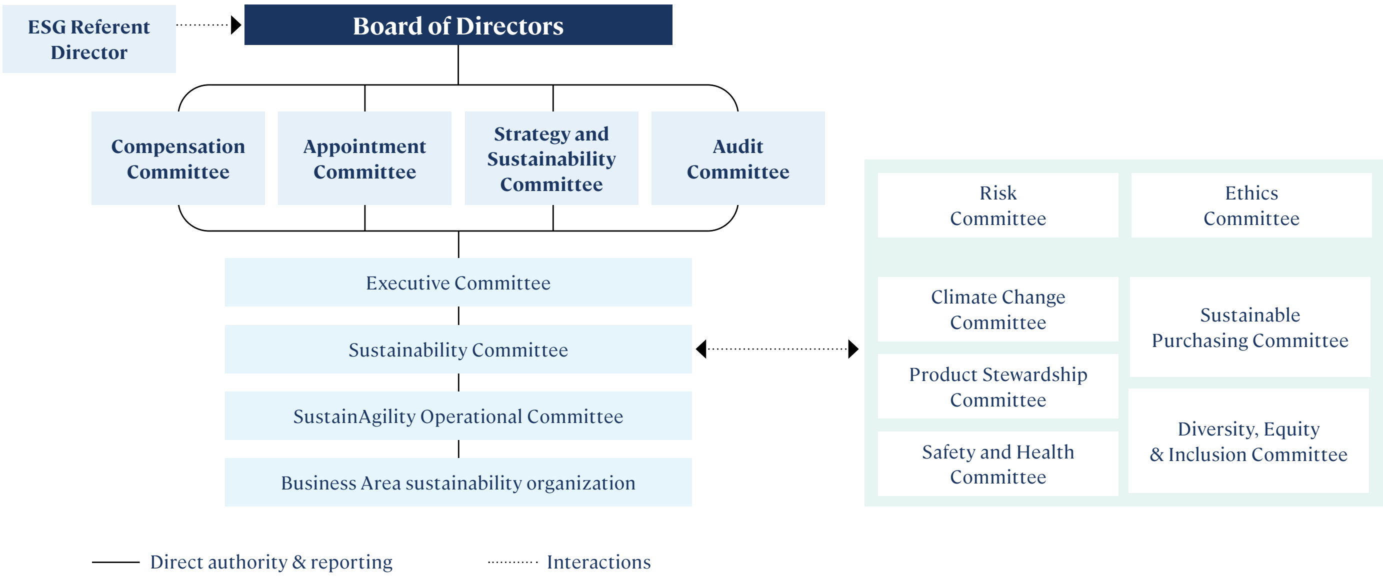
The Group has structured the processes for data consolidation and quality control to ensure the reliability and auditability of the reporting. Deloitte and PricewaterhouseCoopers Audit provided the verification services for sustainability reporting and issued a limited assurance report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852 relating to the year ended 2024. The limited assurance report is available in section 1.8 of the present chapter.

1 The trigger threshold value is set at +/- 5% of the Group greenhouse gas emissions (Scope 1 and 2).

## 1.1.2. A robust governance

Note: Chapter 4 of the Universal Registration Document provides more information related to the Corporate governance structure, the role and diversity of administrative, management and supervisory bodies, and the integration of sustainability-related performance in incentive schemes as presented in disclosure requirements [GOV-1], [GOV-2], and [GOV-3].

### 1.1.2.1. Role of the administrative, management and supervisory bodies [GOV-1]




### Governance structure

#### Board of Directors

The Board of Directors takes into consideration Sustainability issues in the determination and review of the Group's strategy. More specifically, it determines multi-year strategic directions, including those relating to social and environmental responsibility, and reviews the results obtained. In line with the Compensation Committee's recommendations, it incorporates Sustainability indicators in the performance criteria used to determine the Chief Executive Officer's annual variable compensation as well as the sustainability indicators in the criteria for the performance conditions of the long-term incentive plan which benefits the Chief Executive Officer as well as the Group's executive managers and certain key employees. At least twice a year, the Board of Directors agenda covers Sustainability-related items during its meetings.

#### Board-level Committees

**Strategy and Sustainability Committee**

The Strategy and Sustainability Committee makes recommendations to the Board on the Group's strategic directions, including industrial, commercial, financial and innovation strategies, as well as those relating to social and environmental responsibility, including climate change. It controls the methods used by Executive Management to implement this strategy, with the action plan and the time frames within which these actions will be carried out.

**Audit Committee**

- The Audit Committee monitors the process of preparation and control of sustainability information, encompassing impacts, risks, and opportunities, to ensure compliance and quality throughout the process. The Committee examines the results of work conducted by internal and external auditors, as well as the internal control department. It follows up on recommendations, particularly those related to risk analysis, corrective measures, and the development of the Group's risk map. The Committee focuses on material sustainability impacts, risks, and opportunities, while also overseeing sustainability reporting. The Audit Committee provides recommendations to Executive Management on identifying, measuring, and monitoring key potential impacts, risks, and opportunities within defined areas.

**Compensation Committee**

The Compensation Committee makes recommendations to the Board concerning the compensation policy for the Chief Executive Officer as well as the long-term performance share incentive plans for the Group's, including sustainability criteria.

**Appointments Committee**

The Appointments Committee makes recommendations to the Board concerning the proposed appointment of Corporate Officers, the structure and chairs of the Committees in line with the Diversity policy laid down by the Board.

#### ESG Referent Director

The ESG Referent Director assists the Strategy and Sustainability Committee and the Board in ensuring sustainability integration into strategic decisions, monitors strategy alignment with Board-set sustainability guidelines, supports the Audit Committee in sustainability reporting and impacts, risks and opportunities management oversight. She also ensures the inclusion of relevant sustainability criteria in executive compensation, aids in reviewing sustainability disclosures and coordinates efforts across Board committees. More generally, the ESG Referent Director coordinates and ensures consistency between the work of committees on sustainability. In that view, the ESG Referent Director has the authority to make recommendations on sustainability matters, particularly on main potential impacts, risks and opportunities for the Group in the areas defined and propose related agenda items for Board meetings, thereby ensuring comprehensive integration throughout Imerys' governance structure and decision-making processes.

### Executive-level Committees

#### Executive Committee

Imerys' Executive Committee, under the stewardship and validation of the Board of Directors, relies on the Sustainability Committee to define the ambition and objectives of the Group with respect to Sustainability matters in order to promote long-term value creation through its sustainability program SustainAgility.

#### Sustainability Committee

The SustainAgility program, led by the Chief Sustainability Officer, is overseen by a Sustainability Committee that is chaired by the Group CEO. The Sustainability Committee meets quarterly and is responsible for establishing the Group's sustainability ambition and targets, monitoring sustainability reporting, validating key milestones and guiding and monitoring implementation of progress towards the Group's objectives.

#### Risk Committee

The Risk Committee coordinates risk assessment, management and controls within the Group. It is made up of representatives from the specialized committees and from operational and support departments. It is headed by the Internal Audit & Control Vice-President The Risk Committee contributes in particular to the identification and assessment of the main risks facing the Group within the Group risk map.

#### Thematics committees

The role and responsibilities of the following committees is described in detail in various sections of the present chapter. These committees ensure the implementation of dedicated policies, procedures and controls to manage the impacts, risks and opportunities in their respective thematics. Please refer to the sections of the below table for more information.

| Thematic committees | Sustainability matters covered by the committee | Section |
|---|---|---|
| Sustainability Committee | Definition of the sustainability ambition and validation of the roadmap. Oversight of all environmental matters including climate change, biodiversity and land rehabilitation, management of waste, water conservation, pollution prevention | [ESRS 2 GOV-1], section 1.1.2.1 |
| Ethics Committee | Antibribery, antitrust, Duty of Care, international sanctions, personal data protection and protection of whistleblowers | ESRS [G1-1 G1-2, G1-3], section 1.4.1.3, 1.4.1.4 & 1.4.1.5 |
| Health and Safety Committee | Occupational health & safety of Imerys employees, non-employees and other workers | [ESRS S1], section 1.3.1.4 |
| Climate change Committee | Climate change mitigation and adaptation | [ESRS 2 GOV-3 - E1], section 1.2.2.1 |
| DEI Committee | Diversity, equity and inclusion encompassing gender and nationality equity, disability, and inclusion awareness for minority and/or vulnerable populations | [ESRS S1-1], section 1.3.1.5 |
| Product Stewardship Committee | Personal safety of consumers and/or end-users | [ESRS S4-1], section 1.3.4.2 |
| Sustainable Purchasing Committee | Responsible purchasing encompassing environmental, social and business ethics management of the suppliers | Vigilance Plan Part II, [ESRS S2] |

### SustainAgility Operational Committee

The SustainAgility Operational Committee helps to build on the progress achieved over the past years and to accelerate the implementation of a consistent and comprehensive approach to sustainability within the six pillars of SustainAgility. This SustainAgility Operational Committee, chaired by the Group Chief Sustainability Officer and composed of functional leaders as well as sustainability directors and sponsors of each Business Area, is responsible for coordinating the implementation of the SustainAgility program.

### SustainAgility organization in the Business Areas

Sustainability program implementation is within the operational responsibility of each Business Area, which works with its sustainability experts and the sustainability department to set business area specific targets in line with Group policies and objectives.

### Board members sustainability competencies and training

The process for evaluating Board members skills and expertize is described in section Chapter 4, section 4.1.1, paragraph *Expertise and experience of Board members* of the Universal Registration Document. The specific skills and competencies of Board members related to sustainability matters are presented in the table below, based on their self-assessment. This evaluation encompasses material impacts, risks and opportunities on environmental (including climate change and biodiversity and ecosystems), social and governance topics.

The training of Board members is an ongoing process. Access to targeted online training via Imerys Learning Hub is promoted to Directors on the following main themes: environmental management, climate change, biodiversity, and ethics and compliance. In addition to online training courses, a dedicated 2-hour climate training session was organized in 2024,2024 in which seven Board members participated. Furthermore, several Directors have indicated that they attended training courses during the year in particular related to climate change and business ethics.

| Sustainability skills / experience | Social / Human Resources | Ethics and Business Conduct | Corporate Governance | Climate change | Biodiversity and ecosystems |
|---|---|---|---|---|---|
| Patrick Kron | ● ● ● | ● ● ● | ● ● ● | ● ○ ○ | ○ ○ ○ |
| Stéphanie Besnier | ● ● ○ | ● ● ○ | ● ● ● | ● ● ○ | ● ○ ○ |
| Bernard Delpit | ● ● ○ | ● ● ○ | ● ● ● | ● ○ ○ | ● ○ ○ |
| Laurent Favre | ● ● ● | ● ● ● | ● ● ● | ● ○ ○ | ● ○ ○ |
| Ian Gallienne | ● ● ○ | ● ● ○ | ● ● ● | ● ○ ○ | ○ ○ ○ |
| Paris Kyriacopoulos | ● ● ○ | ● ● ○ | ● ● ● | ○ ○ ○ | ● ○ ○ |
| Annette Messemer | ● ● ● | ● ● ● | ● ● ● | ● ● ○ | ● ○ ○ |
| Laurent Raets | ● ● ○ | ● ● ○ | ● ● ● | ● ● ○ | ● ○ ○ |
| Lucile Ribot | ● ● ○ | ● ● ○ | ● ● ● | ● ● ○ | ● ○ ○ |
| Véronique Saubot | ● ● ○ | ● ● ○ | ● ● ● | ● ● ○ | ● ○ ○ |
| Rein Dirkx (observer) | ● ● ○ | ● ○ ○ | ● ○ ○ | ● ● ○ | ● ○ ○ |

● ● ● Expert knowledges ● ● ○ In-depth knowledge ● ○ ○ Fundamentals knowledge

## 1.1.2.2. Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies [GOV-2]

### Consideration given by the Board, its Committees and by the ESG Referent Director to sustainability issues – Activities in 2024

During 2024, the main responsibilities and work handled by the Board, its Committees and the ESG Referent Director with regard to sustainability matters were as follows:

| Board and/or Committee | Summary of sustainability related work addressed during the reporting period |
|---|---|
| **Board of Directors** | Review of key sustainability performance indicators at the end-2023<br>Review of the results of the double-materiality analysis concerning the potential and actual impacts as well as financial risks and opportunities<br>Review of progress of the sustainability roadmap and associated medium-term objectives to 2025, including review and validation of 3 new objectives and targets related to newly material topics identified during the double materiality analysis<br>Review and validation of the Climate Transition Plan<br>Review of the Group's diversity, equity and inclusion strategy and performance |
| **Strategy and Sustainability Committee** | Review of the Group low carbon electricity strategy<br>Review of climate risk and opportunity study results and validation of climate adaptation priorities |
| **Audit Committee** | Review of the 2023 Déclaration de Performance Extra-Financière and non-financial auditor report and statement<br>Review and validation of appointment of external auditors for 2024<br>Review of the 2024 Sustainability statement advancement<br>Review of the auditor's mission, report and statement for 2024 |
| **Compensation Committee** | Review and validation of sustainability performance criteria and targets (including climate-related) applicable to (i) annual variable compensation of the Chief Executive Officer, and (ii) the long-term performance share incentive for members of the Group's Executive Committee, in line with the SustainAgility roadmap for 2025 |
| **Appointments Committee** | Review of the sustainability-related skills and expertise of Board members as part of the annual Board evaluation. |
| **ESG Referent Director** | Review and coordination of the presentation of all sustainability topics to the Board and Committees |

## Consideration given by the Executive-level Committees to sustainability issues - Activities in 2024

| Executive-level committees | Summary of sustainability related work addressed during the reporting period |
|---|---|
| **Sustainability Committee** | Review of key sustainability performance indicators at the end-2023 |
| | Review and validation of CSRD implementation timeline and progress |
| | Review of the results of the double-materiality analysis concerning the potential and actual impacts as well as financial risks and opportunities |
| | Review and validation of the Climate Transition Plan and review and prioritization of Climate physical and transitional risk assessment results |
| | Review of progress of the sustainability roadmap and associated medium-term objectives to 2025, including review and validation of 3 new objectives and targets related to newly material topics identified during the double-materiality analysis as well as detailed review of biodiversity and water roadmap progress |
| | Review of internal sustainability initiatives (SD Challenge planning and results) |
| **Risk Committee** | Review and update of the Group risk map |
| | Review of double-materiality impact, risk and opportunity scenarios and analysis of results |
| **Ethics Committee** | Review of compliance program implementation |
| | Review and validation of Duty of Care program and publication of the Group Vigilance Plan |
| **Health and Safety Committee** | Review of health and safety performance, program key initiatives, audit findings |
| **Climate Change Committee** | Review of GHG emission reporting, climate workstream planning and progress |
| | Review of climate project pipeline and associated Capex and Opex |
| | Review of Climate Transition Plan |
| | Review of climate physical and transitional risk assessment results |
| **Diversity, Equity & Inclusion Committee** | Review of diversity, equity and inclusion program performance |
| | Review of progress on priority action implementation |
| | Review and validation of communication and training campaigns |
| **Product Stewardship Committee** | Review of program implementation and prioritization of actions |
| **Sustainable Purchasing Committee** | Review of responsible purchasing program performance |
| | Review and prioritization of supplier audit program |
| | Review of GHG emission Scope 3 estimation methodology and reporting |
| | Review of progress on Scope 3 emission reduction initiatives and prioritization of actions |

### 1.1.2.3. Integration of sustainability-related performance in incentive schemes [GOV-3]

Note: the key characteristics of incentive schemes, the specific targets, the inclusion of sustainability-related performance metrics in remuneration policies as well as the approbation process are described in sections 4.3.2.1 and 4.3.2.2 of the Universal Registration Document.

The variable compensation of the Chief Executive Officer and the members of the Executive Committee is based partly on sustainability performance indicators, and included in remuneration policies. These indicators are all specific to Imerys except KPIs related to climate change and percentage of women within the Executive Committee. The compensation structure for executive officers is consistent with the structure that applies to the Group's main managers, comprising fixed compensation and variable compensation (annual and long-term).

The aim is to align the compensation with the Group's strategy, of which sustainability is an integral part. This approach applies to both short- and long-term variable plans, with sustainability indicators linked to environmental, social and governance objectives set in line with the targets of the Group's SustainAgility program, further including GHG emissions, diversity, equity & inclusion and health & safety.

### Methods for assessing achievement of performance criteria set out in annual variable compensation (STI)

The amount of annual variable compensation of the Chief Executive Officer will be determined during 2025 by the Board of Directors, taking into account the extent to which he satisfied quantifiable criteria related to financial and sustainability performance, as well as qualitative individual criteria, subject to approval by the Shareholders' General Meeting.

The quantifiable sustainability performance criteria, accounting for 15% of annual variable compensation, are taken from the Group's "SustainAgility" roadmap (as detailed in section 1.1.4.2, paragraph "Imerys' Sustainability Roadmap" of the present chapter). The targets are set in relation to the year 2022 (except for the criterion relating to the reduction of greenhouse gas emissions which is assessed in relation to the base year 2021) and in line with the Group's 2024 objectives. The annual targets are not made public for confidentiality reasons, but are internally established intermediate steps to achieve the Group's 2025 sustainability targets. The sustainability criteria are set out in greater detail in note (A) available in section 4.3.2.1 of the Universal registration Document.

### Methods for assessing achievement of performance criteria for long-term incentives (LTI)

For 30 years, the eligible beneficiaries of the LTI have been the Corporate Officer, Executive Committee members, Senior Managers of the Group. It represents approximately 230 to 250 beneficiaries per year, i.e. 2% of the Group, in the form of performance shares, indexed to the Group's financial and sustainability performance targets.

The 2024 performance share plan incorporates quantifiable criteria relating to the Group's financial performance and sustainability performance. The quantifiable sustainability performance criteria include a climate criterion as well as other sustainability targets and are defined in accordance with the objectives of the Group's SustainAgility roadmap.

The annual variable compensation of the Chief Executive Officer is linked to 10 specific sustainability objectives and targets. The LTI plan is linked to 6 specific sustainability objectives and targets, all of which are strictly aligned to the Group public commitments and targets. Their overall weighting is 15%.

## 1.1.2.4. Statement on due diligence [GOV-4]

The table below presents the mapping of the main aspects and steps of due diligence of the information provided in the present report.

| Core elements of due diligence | Reference section and related disclosure requirements |
|---|---|
| **Embedding due diligence in governance, strategy and business model** | Section 1.1.2.1 [ESRS 2 GOV-1]<br>Section 1.1.2.2 [ESRS 2 GOV-2]<br>Section 1.1.2.3 [ESRS 2 GOV-3]<br>Section 1.1.4.2 [ESRS 2 SBM-3] |
| **Engaging with affected stakeholders in all key steps of the due diligence** | Section 1.1.2.2 [ESRS 2 GOV-2]<br>Section 1.1.3.2 [ESRS 2 SBM-2]<br>Section 1.1.4.1 [ESRS 2 IRO-1] |
| **Identifying and assessing adverse impacts** | Section 1.1.4.1 [ESRS 2 IRO-1]<br>Section 1.1.4.2 [ESRS 2 SBM-3] |
| **Taking actions to address those adverse impacts** | Section 1.2.2.4 & 1.2.2.5 [ESRS E1-3]<br>Section 1.2.3.3 [ESRS E2-2]<br>Section 1.2.4.3 [ESRS E3-2]<br>Section 1.2.5.4 [ESRS E4-3]<br>Section 1.2.6.3 [ESRS E5-2]<br>Section 1.3.1.4, 1.3.1.5 & 1.3.1.6 [ESRS S1-4]<br>Section 1.3.2.5 [ESRS S2-4]<br>Section 1.3.3.6 [ESRS S3-4]<br>Section 1.3.4.3 [ESRS S4-4] |
| **Tracking the effectiveness of these efforts and communicating** | Section 1.2.2.4 & 1.2.2.5 [ESRS E1-4]<br>Section 1.2.3.4 [ESRS E2-3]<br>Section 1.2.4.4 [ESRS E3-3]<br>Section 1.2.5.5 [ESRS E4-4]<br>Section 1.2.6.4 [ESRS E5-3]<br>Section 1.3.1.4 & 1.3.1.5 [ESRS S1-5]<br>Section 1.3.2.6 [ESRS S2-5]<br>Section 1.3.3.7 [ESRS S3-5]<br>Section 1.3.4.5 [ESRS S4-5]<br>Section 1.6.2 [ESRS 2 MDR-M] |

Before proceeding with any acquisition, the Group carries out due diligence on the sustainability practices of the Company in question in accordance with the Group Merger & Acquisition (M&A) policies and procedures. The due diligence process covers business, legal, financial and tax, operational, purchasing, IT, human resources, environment, health and safety, climate and local stakeholder topics. Through this process the Group aims to assess that the Company's business is consistent with Imerys' social and environmental commitments and that its practices are in line with the Group's sustainability roadmap. The process is carried out under the responsibility of topic owners, by means of questionnaires, interviews, document reviews and site audits, where necessary. The review of the findings are coordinated by a due diligence task force. They are included in the target's assessment and taken into account when deciding whether or not to proceed with the acquisition. The process of approval and internal authorization levels for such decisions are defined in the Group Management Authority Rules. The results of the due diligence process are also taken into consideration when developing the integration plan upon the successful closure of an acquisition.

The companies acquired in 2024 are described in Chapter 6, "Significant events 2024" of the Universal Registration Document.

## 1.1.2.5. Risk management and internal controls over sustainability reporting [GOV-5]

Imerys has disclosed its sustainability performance publicly for more than 10 years and commissioned a third party auditor to perform annual verification, ensuring a self-evaluated compliance-based maturity level[1] of the disclosed information, through the obtention of a limited assurance over the sustainability report. In the short term, the Group plans to implement a risk-based approach to govern sustainability reporting, which shall consist of:

- The implementation of a control strategy across the sustainability reporting framework;
- The sustainability metrics are risk-assessed and supported by controls in the data collation process;
- Regulated (mandatory) and unregulated (voluntary) metrics have proper documentation.

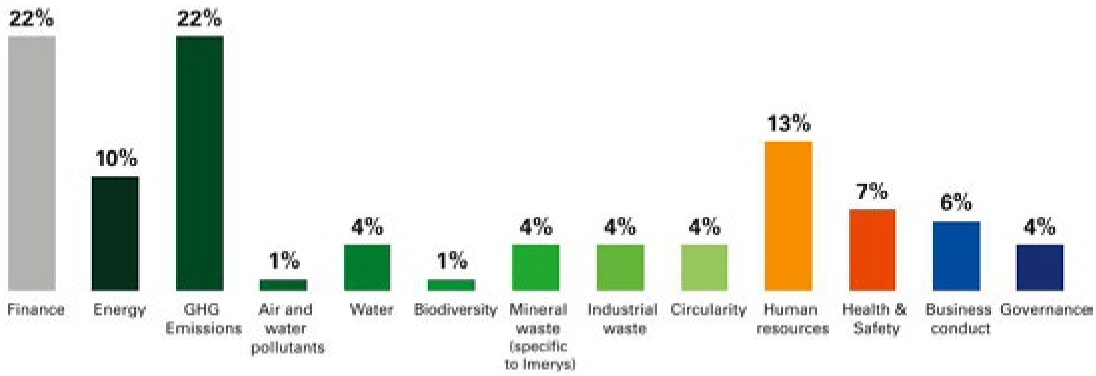
The goal in the midterm horizon is to obtain reasonable assurance through an integrated system of internal controls.

### Scope prioritization

This Sustainability Statement covers a broader scope of information compared to 2023 and its preparation has involved many functional departments of the Group such as Finance, Human Resources, Sustainability, Legal, IT, Purchasing and Mining Resource & Planning among others. Some information has also required the collection of data across the organization, from site level to Corporate level. Therefore, the heterogeneity of materiality of topics, the ownership structure, the reporting structure and the use of the information has required prioritization of internal control implementation.

The risk analysis undertaken in 2024 was applied in priority on quantitative, mandatory and material indicators gathered in topical categories as followed:

**Breakdown of quantitative information per topical category included in the risk assessment**




The boundaries of the topical categories were defined based on the synergies between the required indicators, which have a similar process of data collection, a similar internal or external usage, and are owned by the same department within the organization.

The materiality of information was determined through the double materiality analysis in accordance with the CSRD requirements. Alignment between this analysis and the Group's risk mapping was carried out to ensure consistency between the two approaches and, in particular, the proper consideration of material sustainability challenges in the Group's risk management. The methodology used for the double materiality assessment is described in the disclosure requirement [IRO-1] of the present chapter, while the results of the Group risk mapping are presented in chapter 2.

1 The compliant-based maturity level refers to the definition provided by KPMG in p5 of the document "strengthen internal controls to navigate the "SOXification" of ESG reporting", published in 2023.

## Risk assessment criteria

Each of the topical categories mentioned above were assessed at Group level according to the following criteria:

- **Breakdown of existing versus new indicators:** the implementation of new indicators is more likely to result in reporting errors compared to historical indicators for which training, experience, tools, internal controls exist.
- **Breakdown of centralized versus decentralized indicators:** due to the significant number of sites included in the reporting for some indicators, the collection of primary data at decentralized level is subject to uncertainties compared to indicators collected centrally.
- **Internal and external usage of indicators, covering the risk of fraud:** some indicators used directly or indirectly in Sustainability-Linked Bond(s) (SLB), short term or long term incentive schemes, and other public commitments are potentially subject to specific risks, including fraud risks, and therefore require reinforced internal controls.
- **Historical findings of audits:** the self-assessment surveys and external verifications performed within the last few years provides a basis and a good understanding of the current maturity of the reporting. It gives a clear view on categories for which the accuracy of the reporting is satisfactory and the ones which require additional internal controls.

## Outcomes of the 2024 risk assessment

The results of the risk assessment highlighted the following conclusions:

- Due to the significant number of sites within the Group's consolidated perimeter, the major risk of uncertainty and reporting errors on decentralized information is located in the upstream reporting process, from data collection step prior to the reporting into dedicated IT systems.
- Around 70% of the quantitative requested information is reported through a unique IT system specifically developed for the purpose of collecting and consolidating the operational data. Ensuring a good administration of the platform is key to reducing risks of errors and fraud.
- While the Group operates 150 sites across the world, a reduced number of sites generally account for more than 80% of the consolidated value at Group level. Therefore, a close monitoring of the reporting of these sites significantly increases the accuracy of the reported indicators.
- Certain highly material topical categories are more sensitive to errors and potential fraud risks, based on all criteria mentioned above. They must therefore be subject to specific priority monitoring through appropriate and dedicated internal controls. The concerned categories are in order of priority: energy & GHG emission, water, health & safety and human resources data.

## Risk management & internal controls

The Group applies a risk management framework and internal control systems based on the application guide published in 2010 by the French financial markets authority (Autorité des marchés financiers, AMF). The Imerys risk management and internal control systems cover all controlled entities in the Group's scope of consolidation, including newly acquired companies. By implementing this system across all its businesses, Imerys ensures it has the governance, policies, procedures, means, and behaviors needed to manage the different risks related to operating, industrial, environmental, health and safety and other processes, and that they are efficient and effective.

In addition, Imerys works to continuously improve the quality and accuracy of its reporting. The reporting process with data contributors and validators, as well as the annual automatic checks and comparisons in Imerys' internal reporting platforms, enables the Group to verify data quality internally on an ongoing basis. Processes for data consolidation and quality control ensure the reliability and auditability of the reporting.

*For more information on risk management and internal control, refer to section 2.2 of the Universal Registration Document.*

Concrete improvements of the internal control framework have been progressively implemented over the last few years. In 2024, two internal experts were appointed as internal control referents for the sustainability department and will ensure the communication of the findings with relevant internal functions when necessary on a monthly basis. Quarterly reporting of the major indicators is presented to the Sustainability Committee and bi-annual updates on reporting are made to the Board Audit Committee.

A yearly control measure, implemented since 2023, is performed to automatically identify potential discrepancies in the reporting by comparing data from the current year with data from the past period. If the variation is above the defined threshold[1], it triggers a deeper analysis at centralized level and a justification at site level. The priority status of this request depends on the contribution to the Group value:

- The contribution is above 0.5% of the Group value (from 35 to 55 sites): high priority analysis to be clarified urgently;
- The contribution is above 0.1% of the Group value (from 40 to 55 sites): medium priority analysis to be clarified before any publication;
- The contribution is below 0.1% of the Group value (around 100 sites): low priority analysis not subject to a systematic review, as it is considered as non-material.

Two additional general principles complement the control measures:

- The data is incomplete: high priority reporting weakness to be solved urgently;
- The data is linked to an obvious aberrant error (twice the standard deviation): medium priority analysis to be clarified before any publication.

Within the next few years, the Group will pursue its effort to improve its internal control environment dedicated to sustainability reporting based on a continued analysis of risks, lessons learned from audit findings, reinforced documentations and dedicated internal controls through a midterm structured roadmap.

## 1.1.3. A clearly defined sustainability strategy

### 1.1.3.1. Strategy, business model and value chain [SBM-1]

Note: Chapter 1 of the Universal Registration Document provides more information related to the strategy of the Group, its business model, and its product offering as presented in the disclosure requirement [SBM-1].

#### Vision & ambition

The growing demand for the minerals that are essential to peoples lives, homes and economies means pressure on natural systems. The Group's purpose and core values are presented in section 1.1.1 of the Universal Registration Document, and in full alignment with this Imerys aims to extract and transform minerals and materials responsibly over the long term and deliver sustainable solutions that benefit society. The Group is committed to playing a role in society, to meeting its obligations to the countries and communities within which it does business, to acting as a responsible environmental steward and to contributing to sustainable development through its operations and portfolio of solutions.

In 2018, the Group launched its sustainability program, SustainAgility. The SustainAgility program was developed with due consideration for the 2030 Agenda for Sustainable Development[2] and major international framework agreements such as the United Nations Guiding Principles on Business and Human Rights, the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the International Labour Organization (ILO) Fundamental Conventions.

The SustainAgility program is articulated around three axes:

**Empowering our people**

Making sure employees stay healthy and safe, safeguarding human rights and labor practices, nurturing talent, promoting diversity, equity and inclusion and engaging with local communities

**Growing with our customers**

Behaving ethically, operating fairly, ensuring responsible purchasing, and advancing sustainable products and processes.

**Caring for our planet**

Protecting the environment, promoting natural resources efficiency, respecting biodiversity and acting on climate change.

SustainAgility articulates the Group's comprehensive approach to doing business in a way that creates value for internal and external stakeholders. This approach is supported by a series of dedicated programs that are developed and rolled-out in an iterative fashion. The ultimate goal to be achieved through SustainAgility is to further embed sustainability within the Group strategy and drive systematic continuous improvement of environmental, social and economic aspects in all Group activities, thereby continuing to reduce risks, create new opportunities and build capacity for long-term shared value creation to Unlocking Better Futures. A continuous improvement approach, new projects, and scientific studies continue to be developed and deployed based on a reinforced framework of solid policies, procedures, improved tools, training, as well as a series of maturity matrices against which Group sites are assessed and based on which action plans are developed.

1 For the year 2024, a threshold of ±15% variation was established in comparison to the previous year's figures. This range allows for a reasonable fluctuation in performance metrics while still maintaining accountability and tracking progress effectively.

2 The 2030 Agenda for Sustainable Development, with the Sustainable Development Goals (SDGs) at its core, was adopted by Member States of the United Nations in September 2015. The 2030 Agenda is a commitment to eradicate poverty and achieve sustainable development by 2030 worldwide.

## Key milestones in Imerys' sustainability journey

**2004**
First edition of the SD Challenge

**2008**
First publication of an annual Sustainability report

**2016**
Imerys became a signatory member of the United Nations Global Compact

**2017**
The Group became a signatory of the French BusinessClimate Pledge

**2018**
Launch of the SustainAgility program

Imerys joined act4Nature

**2019**
Climate change strategy aligned with 2°C trajectory validated by the SBTi

**2020**
Launch of the firstmidterm sustainability objectives (2020-2022)

**2021**
Signature of the Women's Empowerment Principles (UN WEPs)

Integration of a Sustainability-Linked Bonds (SLBs) in its financing strategy

**2022**
Unveiling of the Purpose, Vision and Values

Public commitment toward climate change strategy aligned with 1.5°C trajectory

**2023**
Launch of the new midterm sustainability objectives (2023-2025)

2nd SLB issued

Climate change strategy compatiblewith 1.5°C trajectory validated by the SBTi

Scope 1, 2 & 3 targets in $tCO_2eq$

**2024**
Publication of the climate change transition plan

Imerys submitted its new Act4nature commitments

## Contribution to the UN Sustainable Development Goals

In 2016, Imerys became a signatory member of the United Nations Global Compact (UNGC) and has committed to supporting and basing its business approach on the 10 Principles of the UNGC derived from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption. In accordance with these Principles, the Group is committed to publishing its annual Communication on Progress (COP).

In September 2015, 193 Member States of the United Nations adopted 17 Sustainable Development Goals (SDGs) with the aim to end extreme poverty, protect the planet and ensure prosperity for all within a new universal agenda. Imerys supports the ambitions of this global program and has duly identified within the SustainAgility program policies and practices within its operations that directly or indirectly contribute to the SDGs.

The Group is specifically focusing on making a direct and material contribution to the nine SDGs listed below, which indirectly also contribute to the rest of the other SDGs.

Within this chapter, the Group's sustainability commitments, objectives and targets for 2025/2030, are presented in the context of continuous progress made towards the UNGC Principles and the nine UN SDGs that Imerys is focused on. The numbers in the table below refer to the specific UN defined SDG targets where Imerys' own objectives, programs and targets may contribute to the collective goals.

| WE SUPPORT | 3 | 4 | 5 | 6 | 8 | 12 | 13 | 15 | 16 |
|---|---|---|---|---|---|---|---|---|---|
| **Empowering our people** | 3.6 / 3.8<br>3.9 | 4.1 / 4.3<br>4.4 / 4.6<br>4.7 | 5.1 / 5.2<br>5.5 | 6.4 | 8.5 / 8.6<br>8.7 / 8.8 | 12.2 | 13.2<br>13.3 | 15.1 | 16.2<br>16.7 |
| **Growing with our customers** | | | | | 8.8 | | | | 16.3 / 16.51<br>6.6 / 16.7 |
| **Caring for our planet** | | | | 6.3 / 6.4 | 8.4 | 12.2 / 12.4<br>12.5 | 13.2/ 13.3 | 15.1 / 15.31<br>5.4 / 15.5<br>15.8 | |

## 1.1.3.2. Interests and views of stakeholders [SBM-2]

### Fostering constructive dialogue and engagement

The Group depends on the solid long-term relationships it develops with its key stakeholders, respecting the countries, communities and environments where it has operations across the globe. As such, Imerys considers itself accountable to a wide variety of stakeholders, both internal and external. Identifying stakeholders and gaining an understanding of their needs and expectations is a critical step to foster constructive dialogue and engagement.

The list of stakeholder groups with which Imerys engages in various capacities across the globe includes, but is not limited to: customers; employees and employee representative bodies; government authorities; local communities; non-governmental organizations (NGOs) and associations; rating agencies, experts and analysts; scientific research and educational institutions; shareholders, investors and banks; and suppliers and subcontractors.

The interests and views of Imerys' stakeholders provide rich insights to guide the development of the Group strategy, as well as on local improvement action plans. The double materiality assessment has been conducted in collaboration with Imerys' stakeholders through several means of consultation described in the disclosure requirement [IRO-1], paragraph "Stakeholder Engagement" of the present chapter. The results are taken into consideration in the determination and review of the Group's strategy in accordance with regulatory requirements. Refer to section 1.1.4.2, paragraph "Objectives and performance" of the present chapter for more information about the sustainability midterm objectives.

Imerys faces both risks and opportunities in its interactions with the communities surrounding its sites, which need to be continuously identified, assessed and managed. More generally, Imerys contributes to a multitude of regional, national and international economies and through local employment and purchasing, it creates material socio-economic benefits to employees, to suppliers and subcontractors, thus, helping to fight poverty and contribute to sustainable development. Refer to [ESRS S3] of the present chapter for more information about local community engagement.

The table below represents the major dialogue channels with stakeholders. It is not exhaustive.

| Stakeholder | Main Dialogue Channels | Main Departments Involved |
|---|---|---|
| **Customers** | Co-innovation programs<br>Online publication of environmental information on products<br>Customer meetings<br>Customer service assistance | Quality, Customer service,<br>Science & Technology, Operations, Sales, Sustainability |
| **Educational and scientific research institutions** | Partnership programs<br>Research collaboration<br>Internships and research grant projects<br>Sponsorship and charitable projects<br>Employee volunteering | Science & Technology, Human Resources, Sustainability, Operations, Businesses, Finance |
| **Employees & employee representative bodies** | Periodic employee satisfaction survey<br>Regular communication and dialogue (in-person and digital)<br>Social dialogue with employee representation bodies | All functions, Communications, Human Resources |
| **Government authorities** | Communication on Progress via the United Nations Global Compact<br>Periodic meetings with public authorities, legislators<br>Contribution to public policy through open consultations (via professional associations) | Sustainability, Legal, Operations, |
| **Local communities** | Consultation meetings<br>Community programs<br>Open days<br>Grievance mechanisms | Sustainability, Operations, Human Resources |
| **NGOs & associations** | Consultation meetings<br>Local and national partnerships<br>Employee volunteering | Sustainability, Health and Safety, Operations |
| **Rating agencies, experts & analysts** | Quarterly conference calls analysts to present financial and sustainability information<br>Response to non-financial rating questionnaires<br>Periodic meetings to discuss performance | Sustainability, Finance, Investor Relations |
| **Shareholders, Investors & banks** | Capital Market Day<br>Quarterly press release and conference calls with investors and analysts to present financial and sustainability information<br>Regular meetings with shareholders and institutional investors to present strategic developments | Finance, Investor Relations, Sustainability |
| **Suppliers and subcontractors** | Purchaser/supplier meetings<br>Suppliers' Day<br>Supplier visits and audit<br>Supplier corrective action plans | Purchasing,<br>Science & Technology, Businesses, Operations, Sustainability, Legal |

## External and internal recognition

Imerys aligns its strategy on key issues under the United Nations Sustainable Development Goals (SDGs) and global climate scenarios in a manner consistent with its business model and global footprint. This holistic approach to sustainability allows the Group to mitigate risks and also brings tangible value added through greater attractiveness to its internal and external stakeholders. The Group's firm commitment to sustainability has been recognized by leading ESG rating agencies. A selection of the non-financial ratings most recently achieved by Imerys is presented below.

| CDP Climate Change | ecovadis | MSCI |
|---|---|---|
| A | 73 | AA |
| Above industry average B- | 94th percentile | 72nd percentile |
| Metals & mining | All industries | Construction materials |
| (D-- A) | (0 -100) | (CCC to AAA) |

| SUSTAINALYTICS | ISS ESG | S&P Global |
|---|---|---|
| 30.4 | C+ | 62 |
| 73rd percentile | 80th percentile | 85th percentile |
| All industries | Construction materials | Materials |
| (100 - 0) | (D-to A+) | (0 -100) |

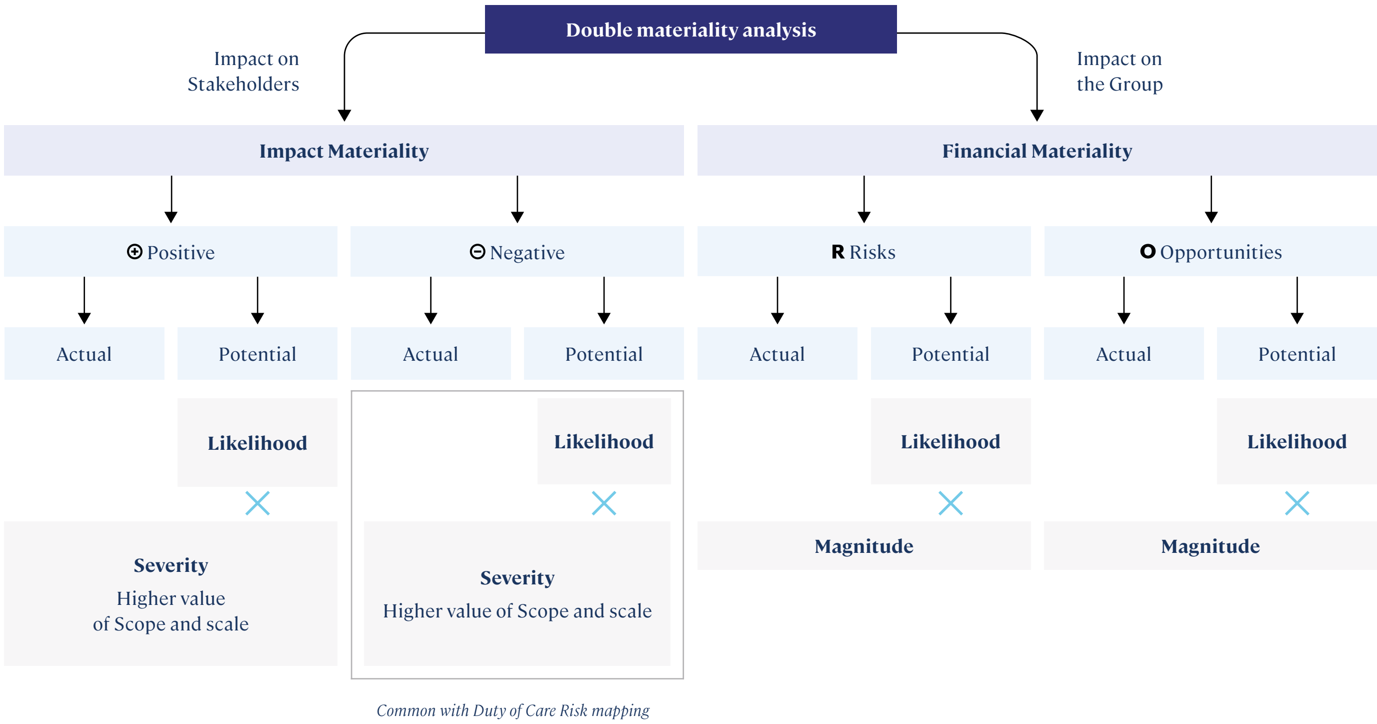
For the past 21 years the Group has been organizing a Group-wide internal competition called the Sustainable Development Challenge (SD Challenge), which gives impetus to developing and sharing best practices, innovations, and technological solutions, each contributing to the Group's sustainability commitments and supporting progress towards several UN Sustainable Development Goals. In total, over 2440 initiatives have been submitted since the competition was launched. To be considered for the SD Challenge, a project must have made a material contribution to the Sustainable Developments Goals, be aligned with the Group Purpose, Vision and Values, and achieve, together with relevant stakeholders, sustainable results in line with the objectives presented in section 1.1.4.2, paragraph "Objectives and performance" of the present chapter. Imerys is committed to ensuring that the Group SD Challenge continues to inspire greater awareness and understanding of material sustainability themes and continues to support the achievement of the Group's long-term sustainability ambition. Refer to Chapter 1, section 1.1.1 of the Universal Registration Document for more information about Imerys Purpose, Vision and Values.

## 1.1.4. Impact, risk and opportunity management

### 1.1.4.1. Process to identify and assess material impacts, risks and opportunities [IRO-1]

Every year since 2018, the Group has published the results of its materiality assessment, which aimed to identify material negative impacts and risks and was conducted based on the methodological standards available at the time. In 2024, Imerys aligned its double materiality assessment methodology with CSRD requirements and the most recent EFRAG[1] guidelines for assessing double materiality[2]. The revised assessment comprises two dimensions as follows:

- The impact materiality assessment is to consider the actual or potential, positive or negative, impacts on people and/or the environment over the short, medium and long term, taking into account the Group's operations and value chain. In 2023, the Group focused on revising its process for assessing material impacts on people and the environment in the context of its Duty of Care risk mapping process. In 2024, preliminary work on the negative impact materiality assessment for the Duty of Care-related scenarios was updated and summarized in the Vigilance Plan presented in part II of the present chapter. Additional sustainability-related matters not part of the Duty of Care risk mapping process were also assessed.
- The financial materiality assessment considers the risks and opportunities triggering or reasonably expected to trigger financial effects on the Group over the short, medium or long term. The financial assessment is aligned with the Group risk mapping process (presented in Chapter 2, section 2.2.3 of the Universal Registration Document), aimed to identify the most material business risks including specific sustainability-related risks, as presented in chapter 2, section 2.1 of the Universal Registration Document.




#### Identification of sustainability matters

In 2023, as part of the Duty of Care risk mapping process, the list of sustainability matters identifying actual or potential impacts, risks and opportunities was assessed internally by experts from sustainability, compliance and responsible purchasing departments and approved during workshop sessions covering all geographies and business activities as well as the value chain. In addition to the exhaustive list of applicable sustainability matters at topic, sub-topic and sub-sub-topic level as defined in point (24) of Article 2 of Regulation (EU) 2019/2088, the Group considered further topics related to its own activity - and already integrated in previous assessment - as well as themes described in the GRI Sustainability Reporting guidelines.

As a result of this examination, the updated list of sustainability matters, called Sustainability Matter Register, includes 41 matters related to Imerys' operations and 13 matters related to its upstream value chain. Each Sustainability Matter has been assessed from an impact and financial materiality perspective, following the methodology described below.

1 The European Financial Reporting Advisory Group. EFRAG's mission is to serve the European public interest in both financial and sustainability reporting by developing and promoting European views in the field of corporate reporting (source: https://www.efrag.org/About/Facts)
2 The concept of double materiality, as defined by EFRAG, requires that both impact materiality and financial materiality perspectives be applied in their own right without ignoring their interaction.

## Impact Materiality assessment

An impact materiality matrix was developed by identifying and hierarchizing the impacts based on their severity and likelihood. Materiality was determined by defining a threshold based on severity for actual impacts and as a combination of severity and likelihood for potential impacts. The severity of a risk scenario results from the scale[1] of its impact on people or the environment (as assessed by workshop participants) and the scope of its impact (based either on objective quantitative data reflecting Imerys' risk exposure or internationally recognized country risk indexes[2]). The impact's likelihood was assessed by workshop participants considering existing controls and current mitigation measures[3]. Qualitative information gathered during workshops was also used to interpret the results, prioritize impacts and design action plans.

The process accounts for all business activities and geographies.

## Financial Materiality assessment

In the financial materiality assessment, financial risks related to sustainability matters were identified and assessed in order to determine the potential negative financial impact on the business. Alignment between this analysis and the Group's risk mapping (presented in chapter 2 of the Universal Registration Document) was carried out to ensure consistency between the two approaches and, in particular, the proper consideration of material sustainability challenges in the Group's risk management. The financial opportunities related to sustainability matters emanate from the Group business strategy presented in chapter 1 of the Universal Registration Document.

When scoring financial risks and opportunities, a matrix - integrating a threshold[4] as a combination of the two axes - was drawn considering the potential magnitude of financial effects based on different triggers (including EBITDA, Capex and Opex) and the likelihood of occurrence. The financial risks and opportunities were assessed based on short, medium and long-term time frames and long trends were also discussed.

## Stakeholder Engagement

Throughout these steps, discussions were held with subject-matter experts from both the Business Areas and Group functions including Sustainability, Environment, Human Resources, Health, Safety, Purchasing, Legal, Compliance, Risk, Finance. European Work Council members were also involved in the impact assessment. Consolidated overviews of the assessment were presented to and discussed with internal stakeholders and Management.

Consultations to review the double materiality assessment process and results were also held with external stakeholders, such as customers, educational and scientific research institutions, banks, investors and shareholders, and peers from the mining industry.

The results of the double materiality assessment were validated by the Executive Committee and the Strategy and Sustainability Committee.

1 Scale is defined in such a way to include Remediability (ex: whether the victim could be restored to an equivalent position before the event causing the impact occurred)

2 Indexes include, but are not limited to, the Yale University Environmental Performance Index, the International Labour Organization Child Labour Index, the Global Slavery Index, the Ecovadis Country Risk Score, the World Resources Institute Aqueduct Index.

3 The assessment of an incident's actual impact severity takes into account mitigation activities implemented before and during the event, such as pollution containment or immediate operational cessation. These measures are evaluated based on their effectiveness in mitigating the impact or its severity, influencing the overall assessment of the incident.

4 For the 2024 assessment, Imerys established a materiality threshold for risks and opportunities at 1% of the Group's 2023 EBITDA

## 1.1.4.2. Material impacts, risks and opportunities [SBM-3]

### Results of the double materiality assessment

The figure below summarizes the sustainability matters associated with negative (-), positive (+) material impacts, risks (R) and opportunities (O) as per the assessment carried out by the Group described in the previous section.

| Most material → Least material[(1)] | Impact Materiality – Potential | Impact Materiality – Actual | Double materiality | Financial Materiality |
|---|---|---|---|---|
| Very high materiality | ⊖ Occupational illness ←●<br>⊖ Rights of indigenous people ●<br>⊖ Security arrangements ●<br>⊖ Negative impacts on local communities ● | ⊖ Occupational injury ●<br>⊕ Community support and development ●<br>⊕ Human capital development ●<br>⊕ Diversity, Equity and Inclusion awareness ● | ⊖R Climate Change mitigation ←●<br>⊖R Climate Change adaptation ●→ | O Natural Solutions for Consumer Goods →<br>O Sustainable construction →<br>O Solution for energy transition → |
| High materiality | ⊖ Violence & harassment ●<br>⊖ Anti bribery ●<br>⊖ Water depletion ●<br>⊖ Whistleblower protection ●<br>⊖ Occupational injury ←<br>⊖ Lobbying activities ●<br>⊖ Access to land and resource rights ●<br>⊖ Communities' civil and political rights ●<br>⊖ Forced Labor ●<br>⊖ Child Labor ● | ⊖ Work-life balance ●<br>⊖ Working time ●<br>⊖ Pollution of air ●<br>⊖ Management of suppliers ←<br>⊖ Inclusion of persons with disabilities ● | ⊖⊕R Impact/loss on biodiversity ●<br>⊖R Pressure on biodiversity ●<br>⊖R Production of mineral waste(2) ←●<br>⊖R Pollution of water ● | O Circular economy ●→<br>R Inadequate safety of consumers and/or end-users → |

⊖ Negative impact or risk ⊕ Positive impact or opportunity R Risk O Opportunity ← Upstream value chain ● Own operation → Downstream value chain

*(1) The non-material topics are not presented in this figure*
*(2) Sustainability matters specific to Imerys*

The results of the 2024 materiality assessment confirm that the topics that had been defined as highly material priorities in 2023, remain highly material in 2024. While some IROs related to affected communities were not assessed as  material in 2023, the new assessment highlighted some  potentially material negative impacts for which the Group will address through the definition of a dedicated objective in its midterm roadmap (2023-2025). More detailed information about material impact, risks and opportunities and their localization in the value chain is available in the tables below.

| ESRS E1. Climate change | | | | | |
|---|---|---|---|---|---|
| **Materiality** | | **Location within the value chain** | | **Description of the IRO** | **Timehorizon[1]** |
| *Sub-topic: Climate change adaptation* | | | | | |
| ⊝ | Potential negative impact | ● | Own operations<br>(all activities) | Group activities may adversely affect the adaptation efforts or the level of resilience to physical climate risks of people and of the environment. | ●●○ Medium |
| R | Risk | ● | Own operations<br>(all activities) | The Group may be exposed to financial risks due to:<br>1) increased severity and frequency of extreme weather events such as cyclones and floods and/or;<br>2) changes in precipitation patterns and extreme variability in weather patterns. | ●○○ Short |
| O | Opportunity | → | Downstream value chain | Solution for energy transition: the Group's development strategy aims to grow it annual revenue in activities related to solutions for the energy transition. | ●●○ Medium |
| O | Opportunity | → | Downstream value chain | Sustainable Construction: the Group's development strategy aims to grow it annual revenue in activities related to sustainable construction. | ●●○ Medium |
| *Sub-topic: Climate change mitigation* | | | | | |
| ⊝ | Actual negative impact | ● | Own operations<br>(all activities) | Group activities contribute to climate change through the release of greenhouse gases during extraction and processing activities. | ●●○ Medium |
| ⊝ | Potential negative impact | ← | Upstream value chain<br>(Raw materials, Mining, Energy, Transport, Packaging, Chemicals, Industrial services and General services categories) | The activities of Imerys subcontractors and suppliers may contribute to climate change through the release of greenhouse gases, with varying intensity based on their activity. | ●●○ Medium |
| R | Risk | ● | Own operations<br>(Extractive activities) | The Group may be exposed to financial risks associated with current or emerging regulatory requirements, increasing tax or carbon quotas, or costs of energy and raw materials in the market, and shifting customer preferences. | ●○○ Short |

| ESRS E2. Pollution | | | | | |
|---|---|---|---|---|---|
| **Materiality** | | **Location within the value chain** | | **Description of the IRO** | **Time horizon** |
| *Sub-topic: Pollution of air* | | | | | |
| ⊝ | Actual negative impact | ● | Own operations<br>(SET[2] and RAC[3] business areas) | Group activities cause air pollution and may deteriorate local air quality as a result of the various air emissions generated during production processes. | ●●○ Medium |
| *Sub-topic: Pollution of water* | | | | | |
| ⊝ | Actual negative impact | ● | Own operations<br>(all activities) | Group activities impact water quality (surface and/or ground) in the event of accidental release of effluents containing hazardous substances or suspended matter. | ●○○ Short |
| R | Risk | ● | Own operations<br>(all activities) | The Group may be exposed to financial risks related to increasingly stringent pollution prevention and control requirements or reputational damage in case of pollution incident or non-compliance with new pollution regulations. | ●○○ Short |

| ESRS E3. Water and marine resources | | | | | |
|---|---|---|---|---|---|
| **Materiality** | | **Location within the value chain** | | **Description of the IRO** | **Time horizon** |
| *Sub-topic: Water depletion* | | | | | |
| ⊝ | Potential negative impact | ● | Own operations<br>(all activities) | Group activities may have an impact on water reserves in the event of inefficient water management (excessive consumption, withdrawal or lack of recycling), potentially contributing to water scarcity or tension over water availability. | ●●● Long |

1 The time horizons on climate change IROs is described in ESRS 2 [BP-1 & BP-2] of the present chapter
2 SET refers to Solution for Energy Transition as described in chapter 1 of the present report
3 RAC refers to Refractory, Abrasives and Construction as described in chapter 1 of the present report

| ESRS E4. Biodiversity and ecosystems | | | | |
|---|---|---|---|---|
| **Materiality** | | **Location within the value chain** | **Description of the IRO** | **Time horizon** |
| *Sub-topic: Pressure on biodiversity* | | | | |
| ⊖ | Actual negative impact | ● Own operations (Extractive activities) | Group activities contribute to the drivers of biodiversity loss, including land-use change, introduction of invasive alien species, pollution, and climate change. | ●○○ Short |
| R | Risk | ● Own operations (Extractive activities) | The Group may be exposed to financial risks related to increasingly stringent nature-related regulations and/or requirements, including rehabilitation, or to reputational damage in case of damage to biodiversity. | ●○○ Short |
| *Sub-topic: Impact/loss of biodiversity* | | | | |
| ⊖ | Actual positive impact | ● Own operations (Extractive activities) | Group activities have positive impacts on local biodiversity in the event that rehabilitation and restoration efforts result in land uses with greater biodiversity value than the initial land uses. | ●●● Long |
| ⊖ | Potential negative impact | ● Own operations (Extractive activities) | Group activities may have negative impacts on the state of species and/or on the extent and condition of ecosystems as a result of quarrying operations. | ●●○ Medium |
| R | Risk | ● Own operations (Extractive activities) | The Group may be exposed to financial risks related to increasingly stringent nature-related regulations and/or requirements, including rehabilitation, or to reputational damage in case of damage to biodiversity. | ●○○ Short |

| ESRS E5. Resource use and circular economy | | | | |
|---|---|---|---|---|
| **Materiality** | | **Location within the value chain** | **Description of the IRO** | **Time horizon** |
| *Sub-topic: Production of mineral waste* | | | | |
| ⊖ | Actual negative impact | Own operations ● (Extractive activities) | Group activities have negative impacts on resource use in the event of inefficient mineral resources extraction, generation of excessive mineral waste and/or improper mineral waste management. | ●○○ Short |
| R | Risk | Own operations ● (Extractive activities) | The Group may be exposed to financial risks related to emerging circular economy regulations and/ or increasingly stringent mineral waste management requirements or increasing management costs. | ●○○ Short |
| *Sub-topic: CIRCULAR ECONOMY* | | | | |
| O | Opportunity | ● Own operations Downstream value chain | The Group's development strategy aims to develop new business opportunities linked to the development of products associated with the circular economy (resource recovery, circular supply, product life extension) | ●●● Long |

| ESRS S1. Own Workforce | | | | |
|---|---|---|---|---|
| **Materiality** | | **Location within the value chain** | **Description of the IRO** | **Time horizon** |
| *Sub-topic: Working conditions* | | | | |
| ⊖ | Actual negative impact | ● Own operations (all activities) | Inadequate working time: Group activities have negative impacts on employees in the event it denies limitations on overtime, requires long shifts, night and weekend work and does not provide adequate lead time for shift scheduling. | ●○○ Short |
| ⊖ | Actual negative impact | → Own operations (all activities) | Inadequate work-life balance: Group activities have negative impacts on employees in the event that working conditions prevent employees from balancing their work and private lives. | ●●○ Medium |
| ⊖ | Potential negative impact | ● Own operations (all activities) | Occupational illness: Group activities may have negative impacts on employees in the event that it does not provide adequate protection to employees to prevent occupational diseases. | ●●● Long |
| ⊖ | Actual negative impact | ● Own operations (all activities) | Occupational injury: Group activities have negative impacts on employees in the event that it does not provide adequate protection to employees to prevent occupational injuries, life changing accidents or fatalities. | ●○○ Short |
| *Sub-topic: Other work-related rights* | | | | |
| ⊖ | Potential negative impact | ● Own operations (all activities) | Child Labor: Group activities may have negative impacts on efforts against child labor in the event that minimum age requirements for employees are not properly enforced. | ●●● Long |
| ⊖ | Potential negative impact | ● Own operations (all activities) | Forced labor: Group activities may have negative impacts on efforts against modern slavery in the event that it inadvertently allows any form of forced labor, slavery, human trafficking, prison labor, or retention of passports across its operations. | ●●● Long |

| ESRS S1. Own Workforce | | | |
|---|---|---|---|
| *Sub-topic: Equal treatment and opportunities for all* | | | |
| ⊕ Actual positive impact | ● Own operations (all activities) | Human capital development and local economic benefits: Group activities have positive impacts on local employees as through training and skills development employees gain new competencies, professional experiences, career opportunities and increased lifetime earning potential as a result of their employment with Imerys. Indirectly this contributes to local, regional and/or national economies and can likewise support the development of infrastructure in remote areas given that most Imerys sites are located away from main employment areas where employment options are relatively limited. | Short |
| ⊕ Actual positive impact | ● Own operations (all activities) | Diversity, equity and inclusion awareness: Group activities have positive impacts on local employees and local communities as through proactive diversity, equity and inclusion programs inclusion awareness for minority and/or vulnerable populations may increase amongst employees as well as local communities. | Short |
| ⊖ Actual negative impact | ● Own operations (all activities) | Non-inclusion of persons with disabilities: Group activities have negative impacts on employees in the event that it discriminates against people with disabilities and/or fails to ensure adequate accessibility and adaptation measures. | Short |
| ⊖ Potential negative impact | ● Own operations (all activities) | Violence and harassment: Group activities may have negative impacts on employees in the event that it neither prevents, nor sanctions violence and harassment in the workplace. | Medium |

| ESRS S2. Workers in the value chain | | | |
|---|---|---|---|
| **Materiality** | **Location within the value chain** | **Description of the IRO** | **Time horizon** |
| *Sub-topic: Occupational illness* | | | |
| ⊖ Potential negative impact | ← Upstream value chain (Raw materials, Mining, Energy, Transport, Packaging, Chemicals, Industrial services and General services categories) | The activities of Imerys subcontractors/suppliers may have negative impacts on their employees in the event that they do not provide adequate protection to employees to prevent occupational diseases | Medium |
| *Sub-topic: Occupational injury* | | | |
| ⊖ Potential negative impact | ← Upstream value chain (Material for Mining, Transport, Packaging and Industrial services categories) | The activities of Imerys subcontractors/suppliers may have negative impacts on their employees in the event that they do not provide adequate protection to employees to prevent occupational injuries, life changing accidents or fatalities | Medium |

| ESRS S3. Affected communities | | | |
|---|---|---|---|
| **Materiality** | **Location within the value chain** | **Description of the IRO** | **Time horizon** |
| *Sub-topic: Communities' economic, social and cultural rights* | | | |
| ⊕ Actual positive impact | ● Own operations (all activities) | Community support and development: Group activities have positive impacts on local communities through local stakeholder engagement programs, community development initiates and donations focused on education and skill development, environmental stewardship, social development, health, and culture. | Short |
| ⊖ Potential negative impact | ● Own operations (all activities) | Negative impacts on local communities: Group activities may have negative impacts on local communities in the event that it fails to adequately manage environmental or social topics, communicate effectively or remediate negative impacts | Short |
| ⊖ Potential negative impact | ● Own operations (PM,RAC business areas) | Unfair access to land and resource rights: Group activities may have negative impacts on local communities in the event that it infringes on land rights and/or causes land access restrictions | Long |
| ⊖ Potential negative impact | ● Own operations (all activities) | Inappropriate security arrangements: Group activities may have negative impacts on local communities in the event that security arrangement for employees and physical assets do not respect the human rights of local populations | Medium |
| *Sub-topic: Communities' civil and political rights* | | | |
| ⊖ Potential negative impact | ● Own operations (all activities) | Group activities may have negative impacts on local communities in the event that its practices deny the civil and political rights among local communities | Long |
| *Sub-topic: Rights of indigenous peoples* | | | |
| ⊖ Potential negative impact | ● Own operations (Extractive activities) | Group activities may have negative impacts on local communities in the event that it does not respect the rights of indigenous people and/or communities near its sites | Long |

| ESRS S4. Consumers and end-users | | | |
|---|---|---|---|
| **Materiality** | **Location within the value chain** | **Description of the IRO** | **Time horizon** |
| *Sub-topic: sustainable portfolio* | | | |
| O Opportunity | → Downstream value chain | Natural Solutions for Consumer Goods: the Group's development strategy aims to grow it annual revenue in activities related to natural solutions for consumer goods | Long |
| *Sub-topic: Inadequate safety of consumers and/or end-users* | | | |
| R Risk | → Downstream value chain | The Group may be exposed to financial risks related to fines, lawsuits, reputational damage, product recalls, potential market value decline and/or increasingly stringent regulations limiting product sales in particular markets. | Short |

| ESRS G1. Business Conduct | | | |
|---|---|---|---|
| **Materiality** | **Location within the value chain** | **Description of the IRO** | **Time horizon** |
| *Sub-topic: Inadequate whistleblowers protection* | | | |
| ⊖ Potential negative impact | ● Own operations(all activities) | Group activities may have negative impacts on employees or other stakeholders in the event that its internal reporting channels and or protection of whistleblowers are not adequate or effective. | Long |
| *Sub-topic: Opaque political and lobbying activities* | | | |
| ⊖ Potential negative impact | ● Own operations(all activities) | Group activities may have negative impacts on external stakeholders in the event that it undertakes lobbying activities or exerts political influence in an opaque manner. | Long |
| *Sub-topic: Unfair management of suppliers (including payments practices)* | | | |
| ⊖ Actual negative impact | ← Upstream value chain | Group activities have negative impacts on suppliers (especially SMEs) in the event it does not treat suppliers fairly, in particular with respect to payments practices. | Short |
| *Sub-topic: corruption and bribery* | | | |
| ⊖ Potential negative impact | ● Own operations(all activities) | Ineffective antibribery compliance program: Group activities may have negative impacts on multiple stakeholders in the event that its management system to prevent, detect, investigate and address incidents of corruption and bribery is ineffective. | Long |

## Imerys' Sustainability Roadmap

The results of the materiality assessment conducted in 2022 enabled Imerys to define its strategic 3-year roadmap, focusing on key priorities that align with stakeholder expectations and the Group's long-term sustainability goals. This roadmap is primarily focused on:

- Cultivate a safe, healthy, and inclusive environment
- Sustain business ethics in the whole value chain
- Accelerate the development of sustainable solutions
- Intensify climate change mitigation and adaptation actions
- Mitigate the Group local environmental footprints

In 2024, Imerys conducted a comprehensive update of its double materiality assessment in alignment with the Corporate Sustainability Reporting Directive (CSRD) requirements, as presented in the section above. This rigorous process not only reaffirmed the significance of the existing focus areas within the Group's sustainability roadmap but also highlighted the need to incorporate an additional strategic dimension:

- Fostering sustainable prosperity in local communities

By expanding its Sustainability roadmap to encompass this newly identified strategic area, Imerys further strengthens its approach to sustainable value creation and risk management. This proactive adjustment ensures that the Group's sustainability strategy remains comprehensive, forward-looking, and aligned with both internal objectives and external stakeholder priorities.

### Empowering our people

**01**

Cultivate a safe, healthy, and inclusive environment for our people

**02**

Fostering sustainable prosperity in our local communities

### Growing with our customers

**03**

Sustain business ethics in the whole value chain

**04**

Accelerate the development of sustainable solutions

### Caring for our planet

**05**

Intensify climate mitigation and adaptation actions

**06**

Mitigate our local environmental footprints

## 01 Cultivate a safe, healthy, and inclusive environment for our people

Health and safety stand as the cornerstone of Imerys' operations, deeply embedded in the Group's Purpose and guiding the daily behaviors and decisions of its workforce. While Imerys has made significant strides in its pursuit of world-class health and safety standards, the Group remains steadfast in its commitment to continuous improvement. To this end, Imerys is cultivating a more robust health and safety culture that permeates every level of the organization. The Group is actively empowering its employees to adopt a proactive stance towards health and safety, encouraging personal responsibility, fostering a culture of mutual care, and prioritizing safety above all other considerations. This unwavering focus on health and safety stems from Imerys' genuine concern for the well-being of its workforce, ensuring that employees can perform their duties effectively while maintaining a high quality of life. Ultimately, Imerys recognizes that a safer working environment directly correlates with enhanced operational strength and efficiency, enabling the Group to excel in its mission of providing essential mineral resources to the global market.

Diversity, Equity and Inclusion (DE&I) are recognized as core Imerys values that empower people to thrive in a safe and inclusive environment. Ensuring a diverse, equitable and inclusive environment is part of the same core value as safety and health and is crucial to the Group's long-term strategy. The Group is committed to nurturing an inclusive culture where every person matters, where differences are appreciated and people listen to each other, unlocking collective potential. Imerys does not tolerate any discrimination in any form towards employees, contractors or candidates for employment. In keeping with this commitment, the Group strictly prohibits sexual or any form of harassment or discrimination of any kind, including gender, age, nationality, religion, sexual orientation, marital, parental and family status, social origin, ethnicity, disabilities, sensitive medical conditions, political or trade union affiliation or any other dimension. The Group is fully committed to accelerating and pursue its efforts in this field.

## 02 Fostering sustainable prosperity in our local communities

Imerys recognizes effective community engagement as a cornerstone of sustainable practices and a key driver of long-term success. The Group's global presence offers a unique opportunity to create lasting, positive impacts in diverse communities worldwide, which is crucial for maintaining its social licence to operate and ensuring operational stability. Imerys employs a systematic approach to community engagement, founded on mutual trust, respect, and constructive partnerships. This approach is characterized by a long-term commitment to creating shared value, informed by a detailed understanding of local needs and sensitivities. The Group's strategy emphasizes transparent communication, measurable impact, and employee involvement, encouraging all members of the Imerys team to contribute to local community initiatives. Through these efforts, Imerys strives to be a responsible corporate citizen, fostering sustainable development and economic growth in the communities where it operates, while aligning with its broader sustainability goals and corporate values.

## 03 Sustain business ethics in the whole value chain

Imerys is unwaveringly committed to conducting business with the highest standards of integrity, recognizing that ethical behavior is not merely about protecting reputation, but is fundamental to its core operations. The Group acknowledges its obligation to act in an ethical, fair, and transparent manner, actively addressing issues such as corruption, discrimination, and forced labor. Imerys fully embraces its responsibilities to stakeholders and society, adhering to fair practices and supporting evolving Duty of Care regulations. This commitment extends throughout its value chain, with the expectation that partners, suppliers, and customers align with these principles. The Group's dedication to exemplary business conduct is rooted in the belief that upholding fair operating practices and ethical behavior is essential for maintaining a well-managed, stable business. By tackling these issues head-on, Imerys not only mitigates risks to its business and stakeholders but also positions itself as a leader in corporate responsibility, fostering trust and long-term success in the modern business landscape.

## 04 Accelerate the development of sustainable solutions

Imerys is fully aware of stakeholder expectations for the Group to reduce the environmental footprint of its products while at the same time providing sustainable solutions aligned with global megatrends. Managing Portfolio Sustainability by incorporating environmental and societal criteria contributes to the creation of sustainable business opportunities. With its technological expertise, Imerys is in an excellent position to continuously improve the process efficiency and production methods of its operations. At the same time, the Group's innovation capacity together with its awareness of global megatrends enables it to harness opportunities for new product developments, duly considering sustainability drivers and stakeholder expectations.

## 05 Intensify climate mitigation and adaptation actions

Imerys recognizes the urgent need for global action to address the climate crisis and is committed to playing a pivotal role in leading the mineral industry's response. The Group has embraced this challenge as both a responsibility and an opportunity, implementing a comprehensive strategy to combat climate change across all aspects of its operations. This commitment is manifested through concerted efforts to dramatically reduce greenhouse gas emissions throughout its value chain, develop innovative low-carbon products and solutions for customers, and drive the transition towards a sustainable, low-carbon economy. Imerys' approach is systematic and far-reaching, touching every facet of its business and engaging all employees in this crucial mission.

## 06 Mitigate our local environmental footprints

Imerys recognizes the unprecedented environmental challenges facing the planet and acknowledges its crucial role in driving positive change within the industrial minerals sector. The Group is committed to responsible environmental stewardship, reimagining its approach to resource extraction and utilization to minimize the ecological footprint of its operations, products, and supply chain. This commitment is manifested through the implementation of innovative production methods and optimized mineral deposit usage. Imerys' strategy encompasses a holistic understanding of its impact on natural habitats, ecosystems, water resources, and air quality, driving a systematic and transparent approach to environmental care. The Group is actively engaged in biodiversity preservation and restoration. Responding to increasing stakeholder expectations, Imerys aspires to lead its sector in environmental stewardship, recognizing this as fundamental to preserving the planet for future generations and ensuring the long-term sustainability of its business.

## Objectives and performance

In 2022, the Group defined midterm sustainability objectives based on the double materiality assessment process and results presented in disclosure requirements [IRO-1] and [SBM-3] of the present chapter. These objectives are translated into Imerys-specific quantitative targets to be achieved by 2025 and on targets related to GHG emissions reduction to be achieved by 2030. The Group's sustainability commitments, specific objectives for each of the sustainability priority themes as well as the performance indicator and timeline to achieve the objective are presented in the following table and sections together with their alignment to UNGC Principles and the UN Sustainable Development Goals to which they contribute. Each of the Group's sustainability midterm objectives has been translated to objectives by Business Area with a dedicated action plan and monitoring in place. These midterm objectives and targets likewise serve as the basis for individual performance targets linked to variable compensation for the Group CEO, Executive Committee, senior management as well as other managers across the organization as summarized in chapter 4, section 4.3 of the Universal Registration Document.

| Theme | Group Objectives | Baseline | Performance 2024 | Target |
|---|---|---|---|---|
| **Empowering our people** | | | | |
| **Safety** | Improve Group Safety Culture Maturity[1] across all Business Areas | 2022<br>3.0 | 3.2 | 2025<br>3.3 |
| **Health** | Increase the global Occupational Health action plan improvement rate | 2022<br>0% | 63% | 2025<br>75% |
| **Diversity, Equity & Inclusion** | Increase the score of the Diversity, Equity & Inclusion Index[2]<br>(including KPIs related to Gender, Nationality, Disability and inclusion) | 2022<br>0% | 66% | 2025<br>100% |
| **Local communities** | Improve stakeholder engagement by ensuring pilot sites[3] identify and assess potential impacts on local stakeholders as per Group requirements (NEW). | 2024<br>74% | NEW | 2025<br>100% |
| **Growing with our customers** | | | | |
| **Ethics and Compliance** | Improve the external sustainability rating of the Group compared to 2022 assessment | 2022<br>69% | 73% | 2025<br>74% |
| **Responsible Purchasing** | Deploy a sustainability rating scheme of Group suppliers (by spend) | 2022<br>53% | 70% | 2025<br>75% |
| **Product sustainability** | Assess the Products in Application Combinations (PAC) of Imerys product portfolio (by revenue) according to sustainability criteria[4] | 2022<br>55% | 71% | 2025<br>75% |
| | Ensure the Group New Product Developments are scored as SustainAgility Solutions[5] | 2022<br>75% | 86% | 2025<br>75% |

1 Maturity Level 3 corresponds to Proactive level on the Imerys Safety Culture Maturity Matrix where Imerys Safety System is "fully implemented, employees are engaged and contribute actively".
2 Imerys' Diversity, Equity & Inclusion Index is a composite metric used to track diversity, equity and inclusion across a range of dimensions including gender balance, pay equity, nationality, disability, as well as inclusion.
3 The pilot sites were defined based on the five criteria, including financial, grievance, media, permitting and operational indicators.
4 The Group portfolio is assessed using the SustainAgility Solutions Assessment methodology, which is based on the World Business Council for Sustainable Development's Portfolio Sustainability Assessment framework.
5 Based on the SustainAgility Solutions Assessment framework a "SustainAgility Solution" is a product in an application that has scored within the two highest categories of the four possible categories.

## Caring for our planet

| | | | | |
|---|---|---|---|---|
| **Environmental Management** | Reduce environmental impacts by assessing the maturity level of sites against environmental management requirements[1] | 2022<br>0% | 100% | 2025<br>100% |
| | Reduce the risk of air pollution by ensuring priority sites[2] define site specific air emission management plans (NEW). | 2024<br>0% | **NEW** | 2025<br>100% |
| **Natural resources efficiency** | Improve water management by ensuring priority sites[3] comply with new water reporting requirements | 2022<br>0% | 55% | 2025<br>100% |
| | Improve mineral resources efficiency by ensuring priority[4] sites (by mineral waste volume) comply with new mineral waste reporting requirements | 2022<br>0% | 60% | 2025<br>80% |
| **Biodiversity & land rehabilitation** | Reduce impact on biodiversity by filling Imerys Act4nature commitments and conducting biodiversity audits at the priority sites[5] | 2022<br>0% | 82% | 2025<br>100% |
| **Climate Change Strategy** | Reduce Group Scope 1 & 2 greenhouse gas emissions ($tCO_2eq$) by 42% by the end of 2030 from 2021 base year ; compatible with a 1.5°C trajectory | 2021<br>0% | -28% | 2030<br>-42% |
| | Reduce Group Scope 1 & 2 greenhouse gas emissions by 36% relative to revenue ($tCO_2eq$/€ million) by 2030[6] | 2018<br>0% | -32% | 2030<br>-36% |
| | Reduce Group Scope 3 greenhouse gas emissions ($tCO_2eq$) by 25% by the end of 2030 from 2021 base year (from purchased goods and services, capital goods, fuel and energy related activities, upstream and downstream transportation and distribution, waste generated in operations, business travel, employee commuting, and investments) | 2021<br>0% | -15% | 2030<br>-25% |
| | Improve resilience to physical climate risks by assessing Group operations according to climate scenarios and developing adaptation strategies for the three most significant risks (NEW). | 2024<br>0% | **NEW** | 2025<br>100% |

1 Environmental management requirement as defined by Imerys policies and measured by the environmental maturity matrix, which is based on leading international environmental management system standards.
2 The list of priority sites with respect to air emissions is based on (1) Instances where substance threshold exceedances affect more than two sites within the Group (2) sites that exceed the thresholds specified in the European Pollutant Release and Transfer Register (E-PRTR) list.
3 Priority sites refer to water withdrawal and/or discharge > 1 M $m^3$/year and/or located in extremely high water stress zones.
4 Priority sites for mineral waste are defined by volume.
5 Priority sites for biodiversity audits have been defined as sites with a quarry that extracts more than 1 million tonnes per year, or are located within a radius of 5 km of an area classified as International Union for Conservation of Nature (IUCN) category I, II or III, or are located in a biodiversity hotspot within a radius of 5 km of an area classified IUCN category IV.
6 This objective refers to the SBTi Target from 2019 and is linked to the Sustainability Linked Bond (SLB) issued in 2021, thus even though superceeded in 2023 with a new, more ambitious target, it shall continue to be reported until 2030.

## 1.2. Caring for our planet

### 1.2.1. EU Sustainable Finance Taxonomy

#### 1.2.1.1. Reporting scope

Turnover, Capital Expenditure (Capex) and Operating Expenditure (Opex) considered for this reporting cover the full array of Imerys' activities and correspond to the scope of consolidation of its financial statements.

#### 1.2.1.2. Eligibility of Imerys Activities

The analysis of the eligibility of Imerys' activities was carried out with regard to the European Regulation 2020/852 of June 18, 2020 on the establishment of a framework to facilitate sustainable investment within the European Union ("the Taxonomy Regulation"), the Delegated Act 2021/2139 of 4 June 2021 and amendment 2023/2485 of 27 June 2023 on Climate Change mitigation and adaptation, and the Delegated Act 2023/2486 of 27 June 2023 on Sustainable use and protection of water and marine resources, Transition to a circular economy, Pollution prevention and control, Protection and restoration of biodiversity and ecosystems. As per the Disclosures Delegated Act, two of the Group's activities are currently eligible: manufacture of carbon black (Activity CCM 3.11) and manufacture of cement clinker, calcium aluminate cement or alternative blinder (Activity CCM 3.7).

Both of the aforementioned eligible activities are considered to contribute significantly to the environmental objective related to climate change mitigation. The Group considers that these two eligible activities do not contribute substantially to the climate change adaptation objective and the Group has therefore focused exclusively on reporting towards the climate change mitigation objective. The climate change adaptation objective has nevertheless been assessed, together with the other "Do No Significant Harm" (DNSH) criteria.

As per Article 10 (2) of Regulation (EU) 2020/852, these activities are classified as transitional activities, insofar as they are activities for which there are no technologically and economically feasible low-carbon alternatives, but that support the transition to a climate-neutral economy in a manner that is consistent with a pathway to limit the temperature increase to 1.5 degrees Celsius above pre-industrial levels.

After analyzing the list of eligible activities in the Delegated Act (EU) 2023/2486 of June 2023, Imerys has verified that it has no eligible activities that significantly contribute to the four other environmental objectives related to "Sustainable use and protection of water and marine resources", "Pollution prevention and control", "Transition to a circular economy" and "Protection and restoration of biodiversity and ecosystems".

##### Manufacture of Carbon Black[1]

Classified under NACE code C20.13, the manufacture of carbon black is an essential component in the value chain to transition to electric vehicles for the mobile energy market. Transitioning to electric vehicles is a key priority in the fight against climate change. Imerys is the leading supplier of highly conductive carbon-based solutions for lithium-ion batteries used in electric vehicles. These value-added solutions contribute to the transition from fossil fuel based energy to sustainable energy, by providing crucial materials that boost energy density and shorten charging times for lithium-Ion batteries.

##### Manufacture of Calcium Aluminate Cement (Cement clinker, cement or alternative binder[2])

Classified under NACE code C23.51, the manufacture of these products is part of the Refractories, Abrasives and Construction business activity. They support the transition to sustainable construction by providing building chemicals solutions. Building chemicals are experiencing strong growth today, as they reduce the carbon footprint of calcium aluminate cement and concrete – an essential point when the building sector alone represents 40% of $CO_2$ emissions. Imerys produces calcium aluminates for the building industry, where these additives improve the productivity of concrete, in particular by accelerating its hardening. Imerys also manufactures calcium aluminate-based mortar to protect sewer systems against biogenic corrosion, offering an extended service life, and as a consequence lowering the consumption of raw materials, reducing labor and trucking needs reducing the utility owner's greenhouse gas emissions, as well as reducing asset downtime increasing productivity and lowering the risk for untreated water to be released into the environment.

#### 1.2.1.3. Non-eligible Activities – Imerys Mining and Transformation activities

The Taxonomy Regulation defines eligible activities as those that have the greatest impact on climate change and thus offer the greatest potential for reducing greenhouse gas emissions. Currently, these include, in particular, the production and sale of energy, means of transport and transportation services, and real estate development and renovation.

Imerys' main activities, i.e. mining and quarrying, are not within the current Scope of eligible activities addressed by the Disclosures Delegated Act. In particular, green Capex related to the preliminary studies for Imerys' lithium project in France and in the United Kingdom presented in section 3.1.2 of the present chapter, are not yet eligible to the European green taxonomy.

However, the June 2019 Taxonomy Technical Report recognized the contribution that the sector must play in meeting the objective of a climate-neutral Europe by 2050 and recommended analysis of the sector's role in the delivery of raw materials in a sustainable and responsible way.

1 Section 3.11 of the annex I of the Commission Delegated Regulation (EU) 2021/2139 and Appendix II of the Commission Delegated Regulation (EU) 2021/2139.
2 Section 3.7 of the annex I of the Commission Delegated Regulation (EU) 2021/2139 and Appendix II of the Commission Delegated Regulation (EU) 2021/2139.

As a matter of fact, mineral exploration can provide a significant contribution to the achievement of the European Green Deal. It is considered that mineral exploration, when conducted according to international best practices, can play a significant role in the future sustainability of the continent when measured against the four criteria specified in the Taxonomy Regulation:

- reaching the goals of the Paris Agreement[1] requires a quadrupling of mined mineral raw material required for clean energy technologies by 2040;
- responsibly conducted mineral exploration of the resource potential has a direct impact on climate adaptation by reducing dependence on trans-global supply chains;
- recycling may relieve some of the pressure on primary supply. Nevertheless, given increasing demand for mined raw materials recycling will not eliminate the need for continued development of new resources;
- the discovery of resources and development of new mining operations, will, for example, have a global impact on the promotion of best practices and the adoption of the best available technologies.

The EFRAG TWG (Technical Working Group) is currently analysing the technical screening criteria for the potential inclusion of lithium to the list of the taxonomy eligible activities, together with other critical minerals (copper, nickel and cobalt), in line with the Critical Raw Materials Act, which aims at ensuring access to a secure and sustainable supply of critical raw materials, enabling Europe to meet its 2030 climate and digital objectives As such, the Group's mining-related economic activities are not reflected in the financial figures presented below. These figures are likely to evolve in line with the eligibility scope.

*For additional details on the sustainable solutions within Imerys' portfolio, refer to [ESRS S4] of the present chapter.*

## 1.2.1.4. Financial indicators and methodology

In accordance with Article 8 of the Taxonomy Regulation (EU) 2020/852, Imerys' disclosure covers the taxonomy eligibility of the activities described in section 1.2.1.2. For the quantification of eligible activities as well as alignment the revenue, Capex and Opex resulting from products or services associated with eligible economic activities have been determined as per the definitions of Annex I of the Delegated Act supplementing Article 8 of the Taxonomy Regulation.

The present chapter quantifies Imerys' activities related to climate change mitigation. The Group's eligible activities have not been reported as substantially contributing to the climate change adaptation objective and are not listed in the eligible activities for the other four environmental objectives, thus there is no risk of double counting of the Revenue, Capex or Opex indicators reported below. Likewise, Imerys' two eligible economic activities are separate business activities as indicated above in section 1.2.1.2, and as such there is no risk of double counting of the reported taxonomy KPI.

- Revenue: Revenue recognized in accordance with IFRS standard (IAS 1).
- Capex: Capex constituting expenses related to eligible activities calculated based on the increases in tangible and intangible assets for the year before revaluation, depreciation and amortization and excluding changes in fair value and increases related to business combinations (IAS 16, IAS 38, IAS 40, IAS 41, IFRS 16).
- Opex: Non-capitalized direct costs related to research and development, building renovation measures, short-term leases, maintenance and repair and any other direct expenditures related to the day-to-day servicing of items of property, plant and equipment that are necessary to ensure the continued and effective functioning of such assets. Revenue, capital expenditure and operating expenditure presented in this chapter have been retrieved directly from financial statements and reporting systems, without estimations.
- Revenue, Capex and Opex reconciliation with Consolidated Financial Statements

For the denominator, Group revenue and capital expenditures are reported as per section 6.1 of the Universal registration Document.

Total Revenue (numerator) is computed by eligible/aligned activity on the basis of the revenue (excluding intra-group sales) as published in the Consolidated Financial Statements on the "Revenue" line of the consolidated income statement.

The Capex (numerator) reported is related to assets or processes that are associated with Taxonomy-eligible/aligned economic activities, and to some Capex plan that will enable some eligible activity to be aligned within 5 years. No individual capital expenditure other than that associated with the Taxonomy-eligible economic activity reported above has been identified as of December 31, 2024.

The lines in the Consolidated Financial Statements that correspond to the total Capex KPI are included in Note 17 - "Intangible Assets" in line "Acquisitions" of the table of changes and Note 18 "Property, Plant and Equipment" on lines "Acquisitions" and "Acquisition costs and subsequent adjustments".

The lines in the Consolidated Financial Statements that correspond to the total Opex KPI are obtained by the addition of "Lease term of 12 months or less" in Note 7 - "External expenses" and, "Cleaning, Maintenance and repair" and Innovation overheads in the internal reporting.

Similarly to Capex KPI, only Opex corresponding to Taxonomy-eligible/aligned economic activity are reported in the taxonomy-aligned/aligned (numerator) Opex.

1 The Paris Climate agreement in 2015 saw 195 of the world's governments commit to prevent the worst impacts of climate change by limiting global warming to below 2 degrees Celsius, often referred to as the "2° C scenario".

### 1.2.1.5. Summary of Eligibility and Alignment Key Performance Indicators

#### Nuclear and fossil gas related activities

For the time being, no activity is contributing substantially to the five other environmental objectives, and the Group has no eligible activities in the gas or nuclear sectors.

| Nuclear energy related activities | |
|---|---|
| The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle. | NO |
| The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies. | NO |
| The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades. | NO |
| **Fossil gas related activities** | |
| The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. | NO |
| The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels. | NO |
| The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels. | NO |

#### Summary of revenue KPIs

| FY 2024 data | % of Revenue/total Group revenue | |
|---|---|---|
| | Taxonomy aligned | Taxonomy eligible |
| **Climate change mitigation, of which** | **11.9%** | **16.7%** |
| *Manufacture of calcium aluminate cement* | *11.9%* | *13.1%* |
| *Manufacture of carbon black* | *0.0%* | *3.5%* |
| **Climate change adaptation** | **0%** | **0%** |
| **Sustainable use and protection of water and marine resources** | **0%** | **0%** |
| **Pollution prevention and control** | **0%** | **0%** |
| **Transition to a circular economy** | **0%** | **0%** |
| **Protection and restoration of biodiversity and ecosystems** | **0%** | **0%** |

In 2024, the total aligned revenue amounted to 11.9%, coming from calcium aluminate cement activities, out of a total of 16.7% of eligible activities.

#### Summary of revenue, Capex and Opex KPIs[1]

| Activities | Eligibility Alignment | Revenue[2] | | Capex[3] | | Opex[4] | |
|---|---|---|---|---|---|---|---|
| | | 2024 | 2023 | 2024 | 2023 | 2024 | 2023 |
| Manufacture of carbon black | Eligible | 3.5% | 2.9% | 7.8% | 11.3% | 2.4% | 1.6% |
| | *Aligned* | *0.0%* | *0.0%* | *0.8%* | *0.5%* | *0.0%* | *0.0%* |
| Manufacture of calcium aluminate cement | Eligible | 13.1% | 12.3% | 7.2% | 7.2% | 11.8% | 11.2% |
| | *Aligned* | *11.9%* | *11.2%* | *6.3%* | *6.9%* | *11.5%* | *10.8%* |
| **Total** | **Eligible** | **16.7%** | **15.2%** | **15.0%** | **18.5%** | **14.2%** | **12.7%** |
| | ***Aligned*** | ***11.9%*** | ***11.2%*** | ***7.1%*** | ***7.4%*** | ***11.5%*** | ***10.8%*** |

The revenue of eligible and aligned activities in 2024 is comparable to 2023. The decrease in eligible Capex is mainly due to a high comparison basis in 2023, related to the building of additional production capacity of carbon black to serve the demand from the Li-Ion battery market.

1 Mandatory tables according to Article 8- Annex II of Delegated Regulation 2021/2178
2 in % of Group Revenue
3 in % of Group Capex
4 in % of Group Opex

### Revenue from taxonomy eligible and/or aligned activities by environmental objective

| | | | | Substantial Contribution criteria | | | | | | DNSH Criteria (Do No Significant Harm) | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Economic Activities (1) | Code activities from Delegated Act (2) | Turnover (3) | Proportion of Turnover (4) | Climate change mitigation (5) | Climate change adaptation (6) | Water (7) | Pollution (8) | Circular Economy (9) | Biodiversity (10) | Climate change mitigation (11) | Climate Change adaptation (12) | Water (13) | Circular Economy (14) | Pollution (15) | Biodiversity (16) | Minimum Safeguards (17) | Taxonomy Aligned/Eligible proportion Turnover Year N-1 (18) | Category Enabling Activity (19) | Category Transitional Activity (20) |
| | | M€ | % | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| **A. Taxonomy eligible activities** | | | | | | | | | | | | | | | | | | | |
| *A.1 Environmentally sustainable activities (Taxonomy aligned)* | | | | | | | | | | | | | | | | | | | |
| Manufacture of cement clinker, cement or alternative binder | CCM 3.7 | 428.7 | 11.9% | Y | N | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 11.2% | | T |
| Turnover of environmentally sustainable activities (Taxonomy aligned) (A.1) | | **428.7** | **11.9%** | **11.9%** | 0% | 0% | 0% | 0% | 0% | Y | Y | Y | Y | Y | Y | Y | **11.2%** | | |
| Of which enabling activities | | 0.0% | 0.0% | 0.0% | 0% | 0% | 0% | 0% | 0% | | | | | | | | 0.00% | | |
| Of which transitional activities | | 100.0% | 100.0% | 100.0% | 0% | 0% | 0% | 0% | 0% | Y | Y | Y | Y | Y | Y | Y | 100.0% | | |
| *A.2 Taxonomy-Eligible but not environmentally sustainable activities (not taxonomy-aligned activities)* | | | | | | | | | | | | | | | | | | | |
| | | | | EL;N/EL | EL;N/EL | EL;N/EL | EL;N/EL | EL;N/EL | EL;N/EL | | | | | | | | | | |
| Manufacture of cement clinker, cement or alternative binder | CCM 3.7 | 43.9 | 1.2% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 1.1% | | |
| Manufacture of carbon black | CCM 3.11 | 127.9 | 3.5% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 2.9% | | |
| Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2) | | **171.8** | **4.8%** | 4.8% | 0% | 0% | 0% | 0% | 0% | | | | | | | | **4.0%** | | |
| A. Turnover of Taxonomy-eligible activities (A.1+A.2) | | **600.5** | **16.7%** | 16.7% | 0% | 0% | 0% | 0% | 0% | | | | | | | | **15.2%** | | |
| **B. Taxonomy non-eligible activities** | | | | | | | | | | | | | | | | | | | |
| Turnover of Taxonomy non-eligible activities | | **3004.4** | **83.3%** | | | | | | | | | | | | | | | | |
| **Total (A+B)** | | **3604.9** | **100.0%** | | | | | | | | | | | | | | | | |

**Capex from taxonomy eligible and/or aligned activities by environmental objective**

| | | | | Substantial Contribution criteria | | | | | | DNSH Criteria (Do No Significant Harm) | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Economic Activities (1) | Code activities from Delegated Act (2) | Capex (3) | Proportion of Capex (4) | Climate change mitigation (5) | Climate change adaptation (6) | Water (7) | Pollution (8) | Circular Economy (9) | Biodiversity (10) | Climate change mitigation (11) | Climate Change adaptation (12) | Water (13) | Circular Economy (14) | Pollution (15) | Biodiversity (16) | Minimum Safeguards (17) | Taxonomy Aligned/Eligible proportion Capex Year N-1 (18) | Category Enabling Activity (19) | Category Transitional Activity (20) |
| | | M€ | % | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| **A. Taxonomy eligible activities** | | | | | | | | | | | | | | | | | | | |
| *A.1 Environmentally sustainable activities (Taxonomy aligned)* | | | | | | | | | | | | | | | | | | | |
| Manufacture of cement clinker, cement or alternative binder | CCM 3.7 | 26.6 | 6.3% | Y | N | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 6.9% | | T |
| Manufacture of carbon black | CCM 3.11 | 3.4 | 0.8% | Y | N | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 0.5% | | T |
| Capex of environmentally sustainable activities (Taxonomy aligned) (A.1) | | **30.0** | **7.1%** | **7.1%** | 0% | 0% | 0% | 0% | 0% | Y | Y | Y | Y | Y | Y | Y | **7.4%** | | T |
| Of which enabling activities | | 0.0% | 0.0% | 0.0% | 0% | 0% | 0% | 0% | 0% | | | | | | | | 0.0% | | |
| Of which transitional activities | | 100.0% | 100.0% | 100.0% | 0% | 0% | 0% | 0% | 0% | Y | Y | Y | Y | Y | Y | Y | 100.0% | | |
| *A.2 Taxonomy-Eligible but not environmentally sustainable activities (not taxonomy-aligned activities)* | | | | | | | | | | | | | | | | | | | |
| | | | | *EL;N/EL* | *EL;N/EL* | *EL;N/EL* | *EL;N/EL* | *EL;N/EL* | *EL;N/EL* | | | | | | | | | | |
| Manufacture of cement clinker, cement or alternative binder | CCM 3.7 | 3.7 | 0.9% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 0.3% | | |
| Manufacture of carbon black | CCM 3.11 | 29.4 | 7.0% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 10.8% | | |
| Capex of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2) | | **33.1** | **7.9%** | 7.9% | 0% | 0% | 0% | 0% | 0% | | | | | | | | **11.1%** | | |
| A. Capex of Taxonomy-eligible activities (A.1+A.2) | | **63.1** | **15.0%** | 15.0% | 0% | 0% | 0% | 0% | 0% | | | | | | | | **18.5%** | | |
| **B. Taxonomy non-eligible activities** | | | | | | | | | | | | | | | | | | | |
| Capex of Taxonomy non-eligible activities | | **358.3** | **85.0%** | | | | | | | | | | | | | | | | |
| **Total (A+B)** | | **421.4** | **100.0%** | | | | | | | | | | | | | | | | |

## Opex from taxonomy eligible and/or aligned activities by environmental objective

| Economic Activities (1) | Code activities from Delegated Act (2) | Opex (3) | Proportion of Opex (4) | Substantial Contribution criteria: Climate change mitigation (5) | Climate change adaptation (6) | Water (7) | Pollution (8) | Circular Economy (9) | Biodiversity (10) | DNSH Criteria (Do No Significant Harm): Climate change mitigation (11) | Climate Change adaptation (12) | Water (13) | Circular Economy (14) | Pollution (15) | Biodiversity (16) | Minimum Safeguards (17) | Taxonomy Aligned/ Eligible Year N-1 proportion Opex (18) | Category Enabling Activity (19) | Category Transitional Activity (20) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | M€ | % | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y; N; N/EL | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| **A. Taxonomy eligible activities** | | | | | | | | | | | | | | | | | | | |
| *A.1 Environmentally sustainable activities (Taxonomy aligned)* | | | | | | | | | | | | | | | | | | | |
| Manufacture of cement clinker, cement or alternative binder | CCM 3.7 | 26.7 | 11.5% | Y | N | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 10.8% | | T |
| Opex of environmentally sustainable activities (Taxonomy aligned) (A.1) | | **26.7** | **11.5%** | **11.5%** | 0% | 0% | 0% | 0% | 0% | Y | Y | Y | Y | Y | Y | Y | 10.8% | | |
| Of which enabling activities | | 0.0% | 0.0% | 0.0% | 0% | 0% | 0% | 0% | 0% | | | | | | | | 0.0% | | |
| Of which transitional activities | | 100.0% | 100.0% | 100.0% | 0% | 0% | 0% | 0% | 0% | Y | Y | Y | Y | Y | Y | Y | 100.0% | | |
| *A.2 Taxonomy-Eligible but not environmentally sustainable activities (not taxonomy-aligned activities)* | | | | | | | | | | | | | | | | | | | |
| | | | | *EL;N/EL* | *EL;N/EL* | *EL;N/EL* | *EL;N/EL* | *EL;N/EL* | *EL;N/EL* | | | | | | | | | | |
| Manufacture of cement clinker, cement or alternative binder | CCM 3.7 | 0.7 | 0.3% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 0.3% | | |
| Manufacture of carbon black | CCM 3.11 | 5.6 | 2.4% | EL | EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | 1.6% | | |
| Opex of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2) | | **6.2** | **2.7%** | 2.7% | 0% | 0% | 0% | 0% | 0% | | | | | | | | **1.9%** | | |
| A. Opex of Taxonomy-eligible activities (A.1+A.2) | | **32.9** | **14.2%** | 14.2% | 0% | 0% | 0% | 0% | 0% | | | | | | | | **12.7%** | | |
| **B. Taxonomy non-eligible activities** | | | | | | | | | | | | | | | | | | | |
| Opex of Taxonomy non-eligible activities | | **198.9** | **85.8%** | | | | | | | | | | | | | | | | |
| **Total (A+B)** | | **231.8** | **100.0%** | | | | | | | | | | | | | | | | |

## 1.2.1.6. Alignment of eligible activities

The assessment of compliance was based on the criteria set out in Article 3 of Regulation (EU) 2020/852 and the Technical Screening Criteria, included in the Disclosure Delegated Act related to the mitigation climate change objective.

The tables presented in the previous section show the results of eligibility and alignment of Imerys' activities with the Taxonomy Regulation. Their formats correspond to those of the templates for Key Performance Indicators for non-financial companies in Annex II of the Commission Delegated Regulation (EU) 2023/2486 of June 27, 2023.

### Substantial Contribution criteria

Internal reporting systems and data were used to verify compliance with the corresponding limit values at the plant level in order to review the criteria defining whether a substantial contribution to climate change mitigation is made.

#### Calcium Aluminate Cement activities

According to the Delegated Regulation (EU) 2021/2139 of June 4, 2021, calcium aluminate cement activities contribute to the climate change mitigation objective if their specific GHG emissions are lower than 0.722 $tCO_2eq$ per tonne of product. The other technical criteria on $CO_2$ transportation and storage is not applicable to our manufacturing process of aluminate cements.

The GHG emissions of eight plants out of a total of nine plants manufacturing calcium aluminate cement are below this threshold and therefore contribute substantially to climate change mitigation.

- Only one production site is marginally above the threshold of 0.7222 $tCO_2eq$ per tonne of product. Therefore, only the 8 manufacturing plants have been reviewed for the rest of the alignment study.

#### Carbon black activities

According to the Delegated Regulation (EU) 2021/2139 of June 4, 2021, carbon black activities contribute substantially to the climate change mitigation objective if the GHG emissions from the carbon black production processes are lower than 1.141$tCO_2eq$ per tonne of product.

Imerys' carbon black activities are eligible but not aligned with the European Taxonomy on the climate change mitigation criteria, since the GHG emissions of Imerys' manufacturing facilities are above this threshold.

- However, it is to be noted that the Technical Screening Criteria are based on the EU Emission Trading Scheme (ETS) product benchmark for the manufacture of "furnace carbon black" used for the tire industry.
- Imerys' high value added "conductive carbon black" has different properties to furnace carbon black and is not generated through the same process.
- However, in line with its efforts to continuously reduce greenhouse gas emissions, Imerys is pursuing an energy recovery project scheduled for completion by 2025, which will reduce emissions to meet the criteria.
- Imerys started work on the energy recovery project in 2022. Consequently, while no revenue associated with the carbon black activity is aligned, the Capex related to the energy recovery project (€3.4 million in 2024, out of the €32.8 million invested in 2024 for carbon black activities) is considered part of a "Capex plan" to allow Taxonomy-eligible economic activities to become Taxonomy-aligned within a period of five years. Therefore, this portion of the Capex has been isolated and reported as "aligned".

## Do No Significant Harm Criteria

With regard to the "Do No Significant Harm" (DNSH) criteria set out in Article 3 of Regulation (EU) 2020/852 for the applicable environmental objectives, Imerys has verified and validated that all its eligible activities comply with the DNSH criteria, local and internal requirements on the following environmental objectives:

- Climate change adaptation;
- Sustainable use and protection of water and marine resources;
- Pollution prevention and control;
- Protection and restoration of biodiversity and ecosystems.

The table below explains Imerys' methodology to validate those DSNH criteria for the calcium aluminate cement activities.

| DNSH | Description of the validation procedures for calcium aluminate cement activities |
|---|---|
| **Climate change adaptation** | A physical climate risk assessment of all sites of the Group for the current situation and 2050 time-horizon has been carried out and complemented by a risk identification analysis by the Group's global insurance provider.<br>Based on the recommendations of the Group's global insurance provider, an adaptation plan was set up to mitigate each relevant risk identified in 2024 (flooding, hurricanes and water scarcity), with the implementation of actions on a rolling basis. |
| **Sustainable use and protection of water and marine resources** | An assessment was carried out at all the sites concerned, based on the environmental analyses carried out each year, as well as on compliance with the environmental regulations in force in the various countries.<br>For example, to mitigate the risk of water use during drought periods, the Le Teil site in France has made significant optimization for the clinker cooling process in the past years and significantly reduced the corresponding water consumption. |
| **Pollution prevention and control** | For pollution prevention along the value-chain: the Group has checked that activities related to the manufacturing of calcium aluminate cement do not lead to the manufacture, placing on the market or use of raw materials containing substances listed in the regulations related to the DSNH pollution prevention.<br>For emissions control: the eligible sites are operating with a valid licence and under regular inspection by authorities for emissions control. To date, none of the eligible sites in Europe are in the management scope of the European BAT (Best Available Techniques) for air emissions control. When necessary, the eligible sites are investing to maintain or upgrade the emissions control facilities for compliance. |
| **Transition to a circular economy** | The DNSH criterion related to the "Transition to a circular economy" objective is not applicable to the manufacture of calcium aluminate cement as per the Disclosure Delegated Act. |
| **Protection and restoration of biodiversity and ecosystems** | Imerys has validated this criterion for all its calcium aluminate eligible activities by ensuring that the permits had been delivered for each site and that the eligible sites are not located near biodiversity sensitive areas, according to the mapping of IUCN categories. |

## Minimum Safeguards

As defined in Article 3 of the Taxonomy regulation, an activity shall qualify as environmentally sustainable only if it is carried out in compliance with the specific minimum safeguards detailed in the regulation. The Final Report on Minimum Safeguards by the Platform on Sustainable Finance identifies four core topics for which compliance with Minimum Safeguards should be defined, namely: human rights (including workers' rights), bribery, taxation and fair competition.

Human Rights: Imerys is committed to respecting internationally recognized human rights and standards, in particular the International Bill of Human Rights, the Guidelines of the Organization for Economic Co-operation and Development (OECD), the provisions of the fundamental conventions of the International Labor Organization (ILO) and the UN Guiding Principles on Business and Human Rights. Within Imerys' Duty of Care Program the risk of severe impacts on human rights, fundamental freedoms and health and safety resulting from the activities of the Group and those of its subcontractors and suppliers, have been identified and assessed and are managed in line with the French Law on Duty of Care. This program is defined in the Group Duty of Care Protocol.

Bribery: Imerys has adopted a comprehensive Antibribery Compliance Program to prevent, detect and remediate bribery incidents or allegations in compliance with the requirements of the French Sapin II Law. This program is defined in the Group Antibribery Policy and supported by several procedures.

Taxation: The Group Tax Policy is fully in line with the best international standards with respect to anti-tax avoidance and tax evasion practices. The Group operates in countries chosen solely for industrial or commercial purposes and does not enter into artificial arrangements for tax planning purposes, neither transfer value created to low tax jurisdictions, nor use secrecy jurisdictions or so-called "tax havens" for tax avoidance. It is committed to full compliance with its tax obligations, paying the right amount of tax in the right country at the right time.

Fair Competition: Imerys has adopted a comprehensive Antitrust Compliance Program to prevent, detect, and remediate potential antitrust law violations. It is defined in the Group Antitrust Policy and is supported by several procedures.

In addition, no convictions or violations were recorded during the reporting year, likely to call into question compliance with the minimum safeguards.

## 1.2.2. Climate change [ESRS E1]

Imerys recognizes that climate change is a global, systemic, and urgent challenge. Since 2017, Imerys has remained a fully committed member of the French Business Climate Pledge[1]. Through it, Imerys publicly affirms its engagement to contribute to the collective efforts, drawing up a roadmap compatible with the international commitments formulated in the Paris Agreement and working towards SDG 13 to take urgent action to combat climate change and its impacts.

The Group has aligned its 2024 climate disclosure with the recommendations of the TCFD[2]. For the past 15 years, Imerys has participated in CDP[3]. The Group 2024 CDP performance score is ranked as Level A, which places the Group in the highest band, corresponding to leadership of climate issues with best practices in transparency and performance. Imerys' comprehensive climate reporting through CDP is publicly available.

Note: Imerys is part of the EU Paris-aligned Benchmarks. In accordance with Commission Delegated Regulation (EU) 2021/2178, the disclosure of taxonomy-aligned Capex and associated Capex plans supporting the implementation of the transition plan is described in section 1.2.1.5 of the present chapter. Moreover, Imerys does not invest any Capex amounts on economic activities related to coal, oil and gas.

### 1.2.2.1. Climate Change Governance [GOV-3]

Note: Chapter 4 of the Universal Registration Document provides more information related to the Corporate governance structure, the role of administrative, management and supervisory bodies, and the integration of sustainability-related performance in incentive schemes as presented in disclosure requirements GOV-1, GOV-2, and GOV-3.


As part of its mission to promote long-term value creation, the Board of Directors, with the support of its Committees and the ESG Referent Director dedicated to sustainability-related issues, provides specific oversight with regard to climate risks and opportunities. The Group's climate strategy, including its Climate Transition Plan, is reviewed by the Strategy and Sustainability Committee and validated by the Board of Directors. Progress towards established targets is included within the regular Board sustainability updates. The Audit Committee has oversight of climate-related risks and data verification through the review of the Group risk mapping exercise and external audit reports.

The Board oversight is complemented by the inputs of the Chief Executive Officer, the Executive Committee and the Sustainability Committee, led by the Chief Sustainability Officer. The latter's mission is notably to establish the level of the Group's commitment, initiate and review climate-related risk and opportunity assessments, steer the climate change strategy development and monitor progress on implementation within the Business Areas and the Group financial planning.

The Climate Change Steering Committee bridges management and operations, reviewing and approving decarbonization projects based on financial, technical, and sustainability criteria. Made up of representatives and experts from various departments such as Sustainability, Operations, Purchasing, Strategy, Finance, IT, and Science & Technology, specialized working groups focus on specific decarbonization levers, as described in disclosure requirements [E1-1] and [E1-4] in section 1.2.2.4 below. These groups are responsible for conducting feasibility studies, evaluating which existing or future technologies can be applied to Imerys' operations and identifying pilot sites for implementation.

On an operational level, Imerys delivers on its climate change commitments through a dedicated organization, with defined roles and responsibilities, a solid management system, time-bound action-plans, performance monitoring indicators, audit procedures and a continuous improvement program, as part of the Group SustainAgility framework.

Implementation involves collaboration across various operational and functional groups. Group energy efficiency managers and BA energy managers play a crucial role, supporting plants with efficiency methodologies, defining analysis frameworks, and providing training to ensure consistent and reliable reporting.

To support the Group's shared decarbonization ambition, the annual variable compensation of the Group Chief Executive Officer and the long-term compensation shares are linked to the Group's GHG emissions reduction targets. In the same way, the Group's Executive Committee, senior managers and many functional and operational managers have annual variable compensation linked to GHG emissions reduction KPIs.

1 The French Business Climate Pledge is a public commitment made by French companies to reduce greenhouse gas emissions.
2 The Financial Stability Board Task Force on Climate-related Financial Disclosures (TCFD) Recommendations published in 2017 are a widely adopted and accepted reference for disclosing clear, comparable and consistent information about the risks and opportunities presented by climate change.
3 The CDP is a global environmental impact non-profit organization, providing a platform for all companies and cities to report information on their climate impacts.

## 1.2.2.2. Processes to identify and assess material climate-related IROs [IRO-1]

At Group level, Imerys conducted a high-level identification of its material impacts, risks and opportunities related to climate change, in the context of the double materiality analysis (refer to disclosure requirement [ESRS 2 SBM-3] of the present chapter). Imerys also completed a detailed climate risks and opportunities assessment for its operations in 2024, based on end-markets trend analysis in the perspective of a low-carbon economy, and leveraging the Climanomics® tool in collaboration with external climate experts. Additional risks associated with Imerys value chain will be addressed in the future. The updated analysis replaces the initial analysis conducted in 2021 and addresses both transition risks and physical risks. It assesses the Group's additional financial exposure across a range of combined scenarios, based on different temperature rises projections for the year 2100 (RCP scenarios) and alternative futures for socio-economic development (SSP scenarios from IPCC), covering three time horizons (2030, 2040 and 2050). The results of the transition and physical risks study have been presented to the Sustainability Committee (including the CEO, Chief Sustainability Officer, Chief Industrial Officer and Chief Financial Officer) to ensure they are properly integrated in the Group's Business Strategy. These results were also presented to the Group Board's Strategy and Sustainability Committee.

*For more information on Imerys' climate risk and scenario analysis, see Imerys' 2024 CDP Report.*
*Additional details on the Group's roadmap to achieve the targets set are provided in section 1.1.4.2, paragraph «Imerys' Sustainability Roadmap» of the present chapter.*
*These analyses were also used in the context of Group financial planning and impairment tests, see chapter 6, section 6.1, note 4 Estimates and Judgements and note 19 Impairment Tests of the Consolidated Financial Statement.*

### Transition risks assessment

Transition risks are those associated with transitioning into an economy that limits global warming, in the optimal scenario, to 1.5°C above pre-industrial levels. Given the stringent climate policies and carbon pricing needed to drive this shift towards a drastically decarbonizing global economy, and the necessary transformation in technologies and markets, Imerys faces various potential legal, technological, reputational, and market-related transition risks. The most significant risk which is described in the following chapter is due to emerging regulations and carbon pricing mechanisms.

#### Transition risks due to emerging regulations and carbon pricing mechanisms

**Risk description and assessment methodology**

Imerys defines transition risks due to emerging regulation and carbon pricing mechanisms as those that have an impact on its production costs, considering:

- projected evolution of $CO_2$ prices over time across different geographies;
- risk to Imerys' own operations (Scopes 1 & 2), in addition to the risk of rising prices for raw materials, due to new carbon taxes;
- GHG emissions reduction expected from Imerys mitigation actions.

A model has been developed to assess different scenarios in terms of future financial impacts for Imerys depending on projected production levels of Imerys sites, trends in sites' GHG emissions and carbon price projections under the International Energy Agency's (IEA) latest scenarios:

- Stated Policies Scenario (STEPS) - scenario that provides a granular, sector-by-sector evaluation of the policies that have been put in place to reach stated goals and other energy-related objectives, taking account not only of existing policies and measures but also those that are under development.
- Net Zero by 2050 Scenario (NZE) – a normative scenario that shows a pathway for the global energy sector to achieve net-zero $CO_2$ emissions by 2050, with advanced economies reaching net-zero emissions ahead of others.

Imerys assessment includes three time horizons: 2030 (short-term), 2040 (medium-term) and 2050 (long-term), and it considers the financial risk before and after climate mitigation actions. Twelve of Imerys' plants in Europe, the UK and the US (8% of total industrial sites worldwide) are under the EU ETS, UK ETS and California Cap and Trade ETS schemes.

Imerys' transition risks related to its upstream value chain - i.e. impact on Imerys' spending due to increasing costs of purchased goods and services (primarily energy, raw materials and transportation) and thus the final cost of products - are currently under evaluation. This assessment is not limited to carbon prices within a specific geography, but it will also cover carbon tariffs according to the newly established EU Carbon Border Adjustment Mechanism (CBAM).

This assessment does not cover the evolving market trends due to the transition to low-carbon economy, this risk is expected to be counterbalanced by new opportunities, as described in disclosure requirement [ESRS 2 SBM-3 - E1] of the present chapter.

**Mitigation plan and financial incidences**

A strategy has been put in place in order to mitigate identified transition risks related to the current uncertainty associated with emissions-trading schemes and carbon taxes. The process includes: tracking emissions, market intelligence on legislation, emissions and allowances forecast modeling to evaluate short or long positions and a carbon allowances trading strategy. The sites concerned by ETSs are integrated and prioritized within the Group's decarbonization strategy.

Under STEPS scenario, results from Imerys' transition risks assessment indicate its production costs could increase annually by €71-110 million in the short-term (2030) within its own operations (Scopes 1 & 2). This value range represents an application of carbon price projections across multiple geographies and sectors, some of which may not apply specifically to Imerys' activities. Higher range values correspond to Imerys' theoretical risk without any mitigation actions, while lower range values consider Imerys achieves its SBTi-approved GHG emissions reduction targets (i.e. it achieves a reduction of 42% in its Scope 1 & 2 GHG emissions). Positive financial impact due to carbon prices passed on to customers is not taken into account in any scenario. Imerys continues to refine its financial impact due to transition risks evaluation after 2030.

## Physical risks assessment

Physical risks refer to the direct impact of climate change on Group operations, potentially resulting in costs due to asset damages, production stoppages and operating losses. They are typically classified into acute risks, such as short-term extreme weather events that cause immediate disruptions and financial losses, and chronic risks, which involve gradual, long-term climate changes that degrade assets, affect resources, and raise operational costs.

An assessment of Imerys' exposure to climate-related physical risks has been carried out for Group-owned assets and facilities across the globe. The inherent risk has been quantified against climate change hazard maps representing the relative level of vulnerability for various acute and chronic physical indicators (hurricanes, flooding, heat stress, sea level rise, cold waves, water stress, wildfire and changes in precipitation patterns). The study includes scenario analysis considering three time horizons (2030, 2040 and 2050) versus a low (RCP 2.6), moderate (RCP 4.5) and a high scenario (RCP 8.5).

The results of the climate-related physical risks scenario analysis were used as primary input information within the Group's overall risk management approach, which was reviewed in 2024. A new methodology was applied in 2024 using S&P Global Sustainable Climanomics® platform, which enabled Imerys to estimate the future financial impacts of physical risks due to climate change. The majority of the climate data underpinning Climanomics® is derived from the Coupled Model Intercomparison Project (CMIP) run by the World Climate Research Programme. For each Imerys site, geographical coordinates, insured asset value and asset type (production plants, quarries, underground mines, ports and R&D laboratories) were input to obtain the asset value at material risk before climate adaptation actions. The analysis includes flooding (coastal, fluvial, pluvial), heat waves, drought, wildfire, cyclones (hurricanes, typhoons) and water stress. Results are provided in percentage of total insured asset value at risk for each of these extreme weather events, due to additional and unforeseen costs, asset damages and operating losses. Imerys assessment includes the following scenarios for the 2030, 2040 and 2050 time horizons: low (SSP1-2.6), moderate (SSP2-4.5), medium-high (SSP3-7.0) and high (SSP5-8.5).

As Imerys gains a better understanding of these results, it continues to refine its analysis; hence, only preliminary results of this initial assessment are presented.

Water stress, heat waves, and flooding are the three risks potentially affecting the greatest number of assets at Group level; thus, a special focus for each of these risks is provided below.

### Chronic physical risks

**Risk description and assessment methodology**

Chronic physical risks are longer-term shifts in precipitation and temperature, as well as increased variability in weather patterns. As such, the following chronic physical risks were assessed under the four SSP-RCP scenarios and the three time horizons described above: water stress, sea level rise and changes in precipitation patterns. Given its potentially negative financial impact, water stress is the most material chronic physical risk at Group level.

*Water stress:*

Water stress occurs when the demand for water exceeds the available amount during a certain period or when poor quality restricts its use. Water stress causes deterioration of freshwater resources in terms of quantity (aquifer overexploitation, dry rivers) and quality (eutrophication, organic matter pollution, saline intrusion).

Water is required in various steps of Imerys' operations, for instance for cooling, dust suppression and cleaning. Imerys may be further exposed to this risk through its supply chains, as they may rely on energy and input from water-dependent industrial sectors. The availability of water is important to continue production and operations across the value chain, hence water stress is considered as one of the potential material risks to Imerys, particularly for sites located in water scarcity areas, in which physical shortage of water resources are identified.

- Currently, 11 Imerys industrial sites are located in areas at very high risk of water scarcity and;
- 22 under the RCP2.6 scenario;
- 26 under the RCP4.5 scenario;
- 33 under the RCP8.5 scenario.

Refer to disclosure requirement [ESRS E3] for detailed information on sites located in water scarcity areas and/or in water stress.

**Mitigation plan and potential financial impact**

To respond to this risk, for the sites located in water stressed areas according to the assessment, Imerys required that a comprehensive Water Management Plan (WMP) be developed, including a description of current water use, water balance analysis, water accounting, water risk assessment and a pertinent action plan to manage high priority water issues. Imerys is conducting an intensive process improvement plan to measure and report water consumption for each of its sites at high risk in order to set water reduction targets in the future. In addition, various Imerys sites have implemented projects linked to water recycling or water efficiency, especially as part of the continuous improvement program.

Using S&P Global Sustainable Climanomics® platform, Imerys has estimated the level of financial impact based on the percentage of its total insured asset value at risk of water stress ranging from 1.1% in 2030 (under the SSP1-2.6 scenario) to 2.0% in 2050 (under the SSP5-8.5 scenario). These figures do not account for any existing or future adaptation actions.

*For more information on water management, refer to disclosure requirement [ESRS E3] of the present chapter.*

### Acute physical risks

**Risk description and assessment methodology**

Acute physical risks are those that are event-driven, including increased severity of extreme weather events. As such, the following acute physical risks were assessed under the four SSP-RCP scenarios and the three time horizons described above: pluvial and fluvial flooding, heat stress, wildfire and tropical cyclone or hurricane. Among all acute physical risks, two of them are considered to be material at Group level given their potentially high negative financial impact: heat waves and flooding.

Risks, once identified and assessed are managed site by site. Local management is assisted by the Group Insurance and Corporate Industrial Risk Department.

*Heat waves:*

Earth's temperature has risen on average by 0.08°C per decade since 1880, or about 1.2°C in total. The rate of warming since 1981 is more than double at 0.18°C per decade. The 10 warmest years on record have all occurred since 2010. Extra heat on Earth is driving regional and seasonal temperature extremes, reducing snow cover and sea ice, intensifying heavy rainfall, and changing habitat ranges for plants and animals.

Heat wave is a period of prolonged abnormally high surface temperatures relative to those normally expected. Heat waves may span several days to several weeks. Such weather phenomena may be characterized by low humidity, which may exacerbate drought in temperate latitudes, or high humidity, which may exacerbate the health effects of heat-related stress in tropical regions.

Heat waves can affect Imerys' employees' productivity, in addition to their health and well-being. They may have consequences for all workers, whether working indoors or outdoors.

Currently, the risk of heat waves has been assessed as moderate for over half of Imerys industrial sites. Under the RCP4.5 scenario, 76 industrial sites could be potentially at high risk. Under the RCP 8.5 scenario, 60 industrial sites could potentially be at very high risk of heat waves, with another 88 industrial sites potentially at high risk.

*Flooding:*

Flooding occurs when water overflows or soaks land that is normally dry. In general, floods take hours or even days to build up, giving time to prepare or evacuate; however, they sometimes develop quickly and with little to no warning. The most common form of floods are fluvial floods, which happen when rivers or streams overflow their banks. Heavy rain, a broken dam or levee, rapid ice melt in the mountains, or even a beaver dam in a vulnerable spot can overwhelm a river causing it to overflow.

Floods can potentially disrupt or stop, Imerys' operations by damaging its assets as well as interrupting access to its supply chain.

Currently, none of Imerys industrial sites have been identified as being at very high risk of flooding. Under the RCP2.6 scenario, 28 industrial sites could be at very high risk of flooding; 29 under the RCP4.5 scenario and 30 under the RCP8.5 scenario. All of these sites are within the Group's risk prevention program for the management of this risk.

**Mitigation plan and potential financial impact**

Regarding the management of risks that may cause property damage or operating losses associated with extreme climatic events, a specific process has been put in place by the Industrial Risk and Insurance Departments. The process integrates the study of the vulnerability of industrial sites to extreme weather events and natural disasters and includes regular on site inspections. These risks are subsequently integrated into Business Continuity Planning (BCP) exercises, which focus on its most important assets in terms of contribution to the Group's gross margin. The Business Impact Analysis identifies and evaluates potential effects of events on operations, including the implementation of appropriate preventive, adaptation and recovery plans.

*Heat waves:*

Using S&P Global Sustainable Climanomics® platform, Imerys has estimated the level of financial impact based on the percentage of its total insured asset value at risk of heat waves ranging from 2.7% in 2030 (under the SSP1-2.6 scenario) to 4.3% in 2050 (under the SSP5-8.5 scenario). These figures do not account for any existing or adaptation actions.

*Flooding:*

Using S&P Global Sustainable Climanomics® platform, Imerys has estimated the level of financial impact based on the percentage of its total insured asset value at risk of flooding at approximately 0.2% under all scenarios and time horizons. These figures do not account for any existing or adaptation actions.

## Climate-related opportunities

### Development and/or expansion of low emission goods and services

In 2019, Imerys launched its SustainAgility Solutions Assessment framework, which is embedded in all Group processes and was designed in line with the World Business Council for Sustainable Development (WBCSD) guidelines for Portfolio Sustainability Assessments (PSA), to objectively measure the sustainability of Imerys' current portfolio, identify its environmental and social impacts and help continue to steer the Group portfolio towards low-carbon solutions. As part of this process, Imerys has deepened its understanding of climate-related risks and opportunities that could impact customers and end markets, in the perspective of a low-carbon economy.

Based on the Group Portfolio sustainability assessment study, the expansion of a low-carbon economy would have no or a very limited impact on many of the products manufactured by Imerys. Performance Minerals are relatively low carbon products as most of them require limited energy processing before being delivered to the market. Their various physical properties enable them to compete with chemical-based products in many applications. Some products, which represent approximately 10% of consolidated revenue, have measurable and direct positive contributions in the downstream value chain to reduce climate change impact. Among the main markets addressed by Imerys, plastics for automotive and life sciences for agriculture present significant climate opportunities for Imerys products. The drive towards a more circular economy is also providing opportunities across markets for Imerys products that can favor recycling. Imerys' graphite and carbon product offering is driven by the strong growth of the electric vehicle automotive market, mainly for Li-Ion batteries but also for thermoplastics, which represent great climate opportunities, combined with other mobile energy opportunities in electricity and energy storage. The calcium aluminate cement products in the Group's portfolio also contribute to improving the $CO_2$ performance of building materials during the "use phase" in the construction market (doubling lifetime or requiring less material). The broad diversity of the Group's markets and locations, as well as its customer-centric and market-driven organization are considered strengths, decreasing dependency on specific markets and allowing easier adaptation to market evolutions. Some products, which represent approximately 29% of consolidated revenue, serve markets that offer significant climate-related opportunities. The latest assessment was carried out in 2021 based on 2040 projections.

### Development of new products or services through R&D and innovation

In addition to the opportunities for the development and expansion of existing low emission goods and services quantified above, the Group has identified opportunities linked to the innovation of new products beyond the current portfolio. These opportunities, while identified, have not yet been quantified.

The Group has positioned innovation at the heart of its strategy and considers it an effective way to address risks and opportunities for its operations and portfolio related to climate change. Imerys' SustainAgility Solutions Assessment framework is embedded within the innovation process, thereby ensuring that all projects in the innovation pipeline are thoroughly reviewed against defined environmental criteria, including climate change, prior to approval. In 2022, the Group achieved its target of 50% of new product launches rated as "SustainAgility Solutions", meaning a product in a given application that brings high social and environmental contribution to the downstream value chain and, at the same time, demonstrates a low environmental impact in its production phase. This proportion should rise to 75% in 2025, in line with the new target set at the end of 2022. Innovation in this context includes Imerys' investment in adequate technology, development of new products to meet market needs and investment in industrial facilities using new manufacturing processes or new product lines. The Group's Science & Technology (S&T) experts and specialists develop innovative solutions and products based on identifying global megatrends, and customers' expectations and needs, including developing solutions that support the transition to a low-carbon economy.

Imerys plans to become a major player in the European lithium market with a project of a landmark lithium exploitation ("EMILI Project") at its Beauvoir site (in the French Allier department), which has been producing kaolin for ceramics since the late 19th century. Upon successful completion, the project would contribute to the French and European Union's energy transition ambitions. It would also increase Europe's industrial sovereignty at a time when car and battery manufacturers are heavily dependent on imported lithium, which is a key element in the energy transition. The targeted production is 34,000 tons per year of lithium hydroxide, to equip approximately 700,000 electrical vehicles per year. The mine would have a life of at least 25 years, with strong extension potential.

In June 2023 Imerys announced a strategic partnership with British Lithium to accelerate the development of the UK's largest lithium deposit for the annual production of 20,000 tons of lithium carbonate equivalent by the end of this decade.

Both projects will adhere to the highest social and environmental standards and will also follow the IRMA Standard.

*For more information on EMILI project, refer to Chapter 1 section 1.2.2 of the Universal Registration Document.*

### 1.2.2.3. Description of material climate-related IROs [SBM-3]

As described above, the main climate-related risks and opportunities identified are associated with transition risks linked to current or emerging regulatory requirements, increasing taxes or carbon quotas, increasing costs of energy and raw materials in the market, and shifting customer preferences. These may lead to the development of existing products and services with lower emission options and/or opportunities for new products and services. The Group is also exposed to potential physical risks due to climate change. The type and level of each risk determines the management method to mitigate, transfer, accept, adapt or control it.

These material risks and opportunities, their potential impacts as well as how they are taken into consideration within the business strategy and financial planning are described in the following sections.

| ESRS E1. Climate change | | | |
|---|---|---|---|
| Materiality | Location within the value chain | Description of the IRO | Time horizon[1] |
| *Sub-topic: Climate change adaptation* | | | |
| ⊝ Potential negative impact | ● Own operations<br>(all activities) | Group activities may adversely affect the adaptation efforts or the level of resilience to physical climate risks of people and of the environment. | ●●● Medium |
| R Physical risk | ● Own operations<br>(all activities) | The Group may be exposed to financial risks due to:<br>1. increased severity and frequency of extreme weather events such as cyclones and floods and/or;<br>2. changes in precipitation patterns and extreme variability in weather patterns. | ●●● Short |
| O Opportunity | → Downstream value chain | **Solution for energy transition:** the Group's development strategy aims to grow it annual revenue in activities related to solutions for the energy transition. | ●●● Medium |
| O Opportunity | → Downstream value chain | **Sustainable Construction:** the Group's development strategy aims to grow it annual revenue in activities related to sustainable construction. | ●●● Medium |
| **Sub-topic: Climate change mitigation** | | | |
| ⊝ Actual negative impact | ● Own operations<br>(all activities) | **Group activities contribute to climate change through the release of greenhouse gases during extraction and processing activities.** | ●●● Medium |
| ⊝ Potential negative impact | ← Upstream value chain<br>(Raw materials, Mining, Energy, Transport, Packaging, Chemicals, Industrial services and General services categories) | The activities of Imerys subcontractors and suppliers may contribute to climate change through the release of greenhouse gases, with varying intensity based on their activity. | ●●● Medium |
| R Transition risks | ● Own operations<br>(Extractive activities) | The Group may be exposed to financial risks associated with current or emerging regulatory requirements, increasing tax or carbon quotas, or costs of energy and raw materials in the market, and shifting customer preferences. | ●●● Short |

1 The time horizons on climate change IROs is described in ESRS 2 [BP-1 & BP-2] of the present chapter

### 1.2.2.4. Transition plan, actions, and resources regarding climate change mitigation [E1-1, E1-3 & E1-4]

In 2023, Imerys built its transition plan to reach ambitious climate targets compatible with limiting global warming to 1.5°C, as advocated by the Intergovernmental Panel on Climate Change. These targets, drawn up on the basis of climate science, obtained SBTi[1] approval the same year. The plan follows the guidelines of the French Autorité des marchés financiers (AMF), as well as CDP technical note[2].

#### Climate change mitigation targets [E1-4]

In 2023, Imerys committed to reduce its scope 1 and 2 emissions by 42% in absolute terms by 2030 (from a 2021 base year). Imerys also committed to reduce its scope 3 indirect emissions from purchased goods and services, capital goods, fuel and energy related activities, upstream and downstream transportation and distribution, waste generated in operations, business travel, employee commuting and investments by 25% by 2030 (from a 2021 base year). This GHG emissions reduction target covers more than 80% of Imerys overall Scope 3 emissions.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Reduce Group Scope 1 & 2 greenhouse gas emissions ($tCO_2eq$) by 42% by the end of 2030 from 2021 base year; compatible with a 1.5°C trajectory[3] | 2021<br>0% | -28% | 2030<br>-42% |
| Reduce Group Scope 3 greenhouse gas emissions ($tCO_2eq$) by 25% by the end of 2030 from 2021 base year (from purchased goods and services, capital goods, fuel and energy related activities, upstream and downstream transportation and distribution, waste generated in operations, business travel, employee commuting, and investments) | 2021<br>0% | -15% | 2030<br>-25% |
| Reduce Group Scope 1 & 2 greenhouse gas emissions by 36% relative to revenue ($tCO_2eq$/€ million) by 2030 compared to a 2018 baseline[4] | 2018<br>0% | -32% | 2030<br>-36% |

#### Taking action through decarbonization levers [E1-1 & E1-4]

**Reducing Scope 1 & 2 emissions**

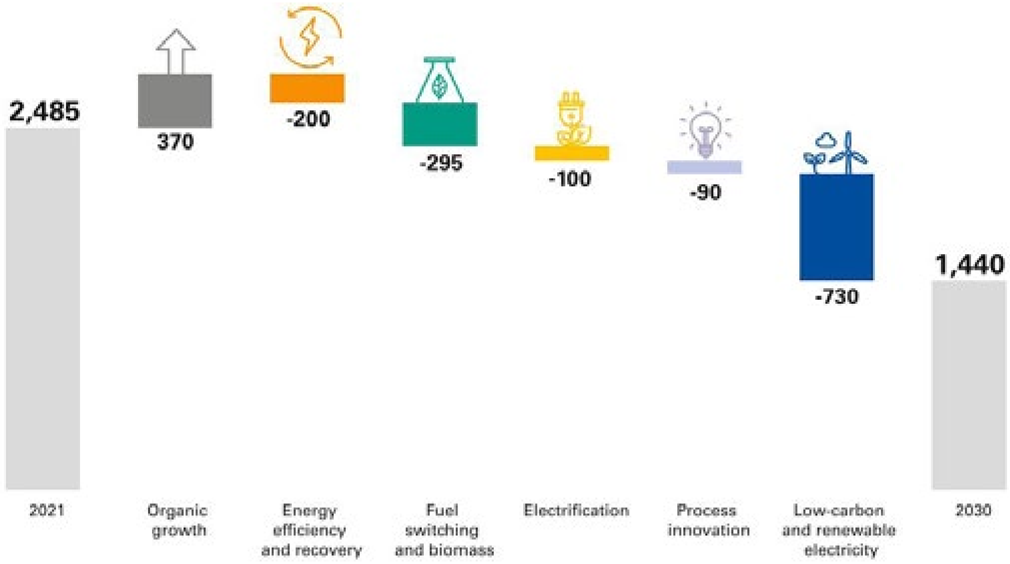
The Group's Scope 1 emissions considered as direct emissions are generated both from the combustion of fuels to produce thermal energy and from chemical reactions of certain processes. Scope 2 emissions considered as indirect emissions are related to purchased electricity and steam consumption. Combined Scope 1 and 2 emissions represent approximately a third of the Group's total emissions.

Imerys has identified six key levers to help decarbonize the Group's operations, reduce Scope 1 and 2 emissions and meet its 2030 targets. In 2024, the Group Capex related to climate mitigation actions amounted to nearly €20 million, mainly due to energy efficiency & recovery and fuel switching to biomass.

| | | |
|---|---|---|
| Energy efficiency and recovery | Fuel switching and biomass | Low-carbon and renewable electricity |
| Electrification | Process innovation | Managing our product portfolio |

1 The Science Based Targets initiative (SBTi) is aligned with the goals of the Paris Agreement. The SBTi was specifically designed to help companies set greenhouse gas emission reduction targets that are in line with the level of decarbonization required to keep global temperature increase below 2°C compared to pre-industrial temperatures, with efforts to limit warming to 1.5°C
2 CDP Technical Note: Reporting on Climate Transition Plans
3 100% of Imerys Scope 1 and 2 GHG emissions are covered by this reduction target.
4 This objective refers to the SBTi Target from 2019 and is linked to the Sustainability Linked Bond (SLB) issued in 2021, thus even though superseded in 2023 with a new, more ambitious target, it shall continue to be reported until 2030.

**Decarbonization levers to reduce Scope 1 & 2 GHG emissions by 42% by 2030 ($ktCO_2eq$)**




The diagram above shows that as Imerys adapts and grows its business to support the transition to a low-carbon economy, the Group will, inevitably, continue to generate emissions. These expected future emissions have been incorporated into the decarbonization trajectory; they will be counterbalanced by additional efforts and projects from decarbonization levers as described below.

The expected reduction potential of each of the decarbonization levers was estimated using a bottom-up approach. Over 140 Scope 1 and 2 decarbonization initiatives have been identified and evaluated. The GHG emissions reduction potential of individual projects have been consolidated to obtain the figures shown in the diagram above.

As the transition plan progresses, fossil-based thermal energy will decrease significantly and biomass and low-carbon electricity will account for an increasing proportion of Imerys' energy consumption. In addition, as 2030 approaches, electricity emissions are expected to be significantly lower.

## Energy efficiency and recovery

Imerys has an operational energy demand, especially in its mineral transformation processes that use thermal technologies and its mining and quarrying activities that use heavy equipment. The Group's energy efficiency strategy aims to optimize productivity while contributing to climate change mitigation.

In 2019, Imerys launched the "I-Nergize" program to evaluate and improve site energy performance, focusing on the top 60+ energy-consuming sites that represent nearly 80% of the Group's consumption. This program employs an assessment methodology covering six key areas: vision, process, maintenance, purchasing, renewables, and Energy Management System (EMS). The goal is to create a three-year roadmap of energy actions for each plant to enhance energy efficiency and reduce GHG emissions. Additional initiatives are generated by local teams through the Group's internal Continuous Improvement program (I-cube) or specific studies.

### I-Nergize program

Evaluate sites' energy performance and improve energy efficiency, with site-specific action plans, including energy recovery.

Top 60 energy-consuming sites – representing:
- 80% of the Group's energy consumption; and
- 80% of the Group's GHG emissions.

2027

The outcome of this program is to define a three-year roadmap of energy actions for each plant in order to improve energy efficiency and reduce GHG emissions.

*Expected outcome*

**100 kt$CO_2$eq**

Expected reduction compared to baseline

*Results at end 2024*

**55 sites**

Assessed

**~45 kt$CO_2$eq**

Already reduced from +1,000 actions identified

### Local initiatives

All operational sites 2029

The aim is to engage local site teams to propose energy reduction initiatives that will be later implemented on-site.

*Expected outcome*

**100 kt$CO_2$eq**

Expected reduction compared to baseline

*Results at end 2024*

**~15 kt$CO_2$eq**

Reduction compared to baseline

## €40 million

Current estimate of Capex required between 2023 and 2030 to meet Scope 1 and 2 targets for this lever.

In 2024, the energy efficiency and recovery Capex amounted to €12.7 million, of which €3.4 million for the energy recovery project in Belgium.

**01** Case study

Focus on one of 2024's flagship initiatives

**Energy recovery plant in Belgium**

In 2023, Imerys started an official partnership with E.On for the construction of a new on-site energy recovery plant to capture feedstock energy contained in syngas, a by-product of the carbon black manufacturing process. From 2025, the plant is expected to supply all the electricity required to produce carbon black at Imerys Willebroek site in Belgium. Surplus energy will be fed to the local grid, providing enough electricity to power up to 40,000 homes each year. This project is expected to reduce Scope 1 emissions by more than 50 kt$CO_2$eq compared to the baseline.

## Fuel switching and biomass

Biomass waste and residues, when feasible, are the preferred option within the Group to replace fossil fuels. Several Imerys plants currently consume biomass waste: sunflower husk, sawdust, landfill gas, olive seeds and peanut hulls. Feasibility studies have been launched to identify other sites with potential projects of fuel switching to biomass to be deployed. For sites where biomass residues are unavailable, natural gas has been selected as the transition fuel to replace more carbon-intensive fossil fuels. In addition, conventional diesel has been replaced with renewable diesel derived from animal fats, used cooking oils and other food waste to power heavy mobile equipment across a few sites in the United States.

### Switch from coal to peanut ground hulls

One site in the US — **2028**

Switch from a historical coal and gas supply to a fuel mix composed of 80% biomass and 20% natural gas used as energy source for combustion in the kilns

*Expected outcome*

**140 kt$CO_2$eq/year**

Expected reduction compared to 2018 (this project started before 2021)

*Results at end 2024*

**17% peanut ground hulls to 83% fossil fuels**

Energy mix of fuels combusted in the kilns

**~30 kt$CO_2$eq**

GHG emissions reduction in 2024 compared to 2018

### Switch from diesel to renewable diesel for mobile equipment

5 sites in the US — **2027**

*Expected outcome*

**15 kt$CO_2$eq/year**

Expected reduction compared to baseline

*Results at end 2024*

By the end of 2024, 2 sites have already replaced diesel with renewable diesel, achieving an annual GHG emissions reduction of

**~5 kt$CO_2$eq**

**€45 million**

Current estimate of Capex required between 2023 and 2030 to meet Scope 1 and 2 targets for this lever

In 2024, the Capex amounted to €4.9 million, mainly related to the fuel switch from coal to peanuts hull in the US. The switch from diesel to renewable diesel for two sites only required Opex. In total, the Opex related to fuel switching projects amounted to €8.1 million.

**02** Case study

Focus on one of 2024’s flagship initiatives

**Renewable diesel for mobile equipment in the US**

Imerys replaced conventional diesel with renewable diesel for heavy mobile equipment at two of its sites in the US. The renewable diesel used is derived from animal fats, used cooking oils and other food waste. Despite the benefits, transitioning to renewable diesel at one site presented challenges, such as renewable diesel's higher gel point in cold weather. The solution was a hybrid approach, mixing standard diesel with renewable diesel during colder months to maintain operational stability. This adaptive strategy highlights Imerys' commitment to combining sustainability with operational reliability. These two projects are expected to reduce Scope 1 emissions by ~5 kt$CO_2$eq annually. Following successful implementation, plans are underway to expand the renewable diesel initiative to other Imerys sites. Strong partnerships and collaboration with suppliers have been pivotal in achieving these first results.

## Low-carbon and renewable electricity

The Group continues to support the transition to renewable energy. Different business models have been developed to promote the purchase of low-carbon electricity from nuclear and renewable sources, including solar, hydro and wind power: Power Purchase Agreements (PPA), lease agreements and direct investment for small scale projects and Guarantees of Origin certificates to top up. Low-carbon and renewable electricity consumption was higher in 2024 than in 2023 with an increase from 11% to 22%, as this is considered to be one of the key levels in the Group's overall decarbonization efforts.

### Produce renewable electricity at Imerys' own sites (on-site PPA)

| Phase 1: 5 sites (Bahrain, Malaysia, US, China, South-Africa) | 2026 |
|---|---|

Installation of solar photovoltaic (PV) farm to generate renewable electricity on-site

*Expected outcome*

**17 $ktCO_2eq$/year**

Expected reduction compared to baseline

*Results at end 2024*

- **Solar PV installations inaugurated: one in Bahrain and one in China**

Energy mix of fuels combusted in the kilns

**~6 $ktCO_2eq$ in 2024**

GHG emissions reduction

| Phase 2: 21 sites (EU, China, UK, Mexico, US) | 2030 |
|---|---|

Installation of solar photovoltaic (PV) farm to generate renewable electricity on-site

*Expected outcome*

**45 $ktCO_2eq$/year**

Expected reduction compared to baseline

*Results at end 2024*

- **preliminary studies completed**

### Sign off-site and virtual PPAs to supply renewable power

| Phase 1: US, EU, UK, China | 2028 |
|---|---|

Switch to an electricity mix based on renewable and low-carbon sources

*Expected outcome*

**200 $ktCO_2eq$/year**

Expected reduction compared to baseline

*Results at end 2024*

- **Due diligence carried out in 2024**

| Phase 2: Other countries | 2030 |
|---|---|

Switch to an electricity mix based on renewable and low-carbon sources

*Expected outcome*

**100 $ktCO_2eq$/year**

Expected reduction compared to baseline

*Results at end 2024*

- **Not started**

**€2 million**

Current estimate of Capex required between 2023 and 2030 to meet Scope 1 and 2 targets for this lever

**03** **Case study**

Focus on one of 2024's flagship initiatives

**Solar PV installation in Bahrain**

Imerys site in Bahrain celebrated its 10-year anniversary with the inauguration of a solar plant. The site is effectively using available space by installing solar panels on a combination of ground-mounted, roof-mounted and carport. 8,538 solar panels have been installed with an annual capacity to generate 7.6 GWh of electricity, which could reduce up to 6 $ktCO_2eq$ per year. The 20-year Power Purchase Agreement (PPA) will terminate in 2042, at which point Imerys becomes rightful owner of the plant.

## Electrification

Electrification of different processes (e.g. dryers, heat pumps, electrical boilers and solar heat) to switch from fossil fuel sources to electricity is currently being studied; preliminary studies show that this lever can contribute 5 to 10% of emissions reductions potential up to 2030.

### Install heat pumps

One site - pilot **2026**

Installation of industrial heat pumps to reduce the consumption of fossil fuels

*Expected outcome*

**1-2 $ktCO_2eq$/year**

Expected reduction compared to baseline

*Results at end 2024*

- **One pilot site selected**

### Install concentrated solar heat facility

One site - pilot **2027**

Installation of concentrated solar heat facility to reduce the consumption of fossil fuels

*Expected outcome*

**2-4 $ktCO_2eq$/year**

Expected reduction compared to baseline

*Results at end 2024*

- **One pilot site selected**

### Electrify dryers

One site - pilot **2027**

Electrification of dryers to reduce the consumption of fossil fuels

*Expected outcome*

**2-3 $ktCO_2eq$/year**

Expected reduction compared to baseline

*Results at end 2024*

- **One pilot site selected**

**€3 million** (for pilot above, which will be used as a proof of concept to validate further electrification projects)

Current estimate of Capex required between 2023 and 2030 to meet Scope 1 and 2 targets for this lever

In 2024, the Capex related to electrification projects amounted to €535 thousands.

**04** Case study

Focus on one of 2024's flagship initiatives

**Heat pump installation in France**

Imerys has approved a heat pump installation project at one of its sites in France to begin construction in 2025. The objective is to install a refrigeration closed circuit to reduce fresh water withdrawals by 95%. A heat pump will subsequently be used to recover the heat from the hot water and replace 10% of the natural gas consumed on-site, both for drying and for heating buildings. Not only will this project help decarbonize Imerys' operations by reducing the site's gas consumption, but it will also significantly improve water management. This is a pioneer electrification pilot project that has the potential to be replicated across numerous Imerys sites.

## Process innovation

Dedicated process innovation teams within each of the Group's science and technology organizations are conducting process technology research, laboratory testing and pilot studies to develop solutions to tackle the more challenging process-related emissions. A working group of experts oversees an incubator of promising technologies which feed into all the other levers - e.g. radiative heat recovery & heat pumps may feed the energy efficiency lever, while dielectric heating and thermal battery technologies will feed electrification. The incubator includes many additional levers such as circularity, carbon capture & mineralization, hydrogen, plasma torches, nuclear microreactors, and alternative bio-feedstocks. As these new technologies will mostly deliver results after 2030, this experts' working group is further studying key unknowns, including expected future carbon taxes, future energy costs, ability to earn green premiums and potential funding opportunities.

### Study various potential innovative decarbonization technologies

All Imerys research centers

2030

Identification of innovative decarbonization technologies to be adopted and eventually brought to industrial scale

*Expected outcome*

**~50 $ktCO_2eq$/year**

Expected reduction compared to baseline

*Results at end 2024*

- **Case studies completed for specific technologies**

## €65 million

Current estimate of Capex required between 2023 and 2030 to meet Scope 1 and 2 targets for this lever.

In 2024, the Capex (R&D) related to development of a new furnace technology using hydrogen amounted to €588 thousands.

**05** **Case study**

Focus on one of 2024's flagship initiatives

**Decarbonizing through Project PRECIZE**

Imerys is undertaking a major emissions reduction project in France to help enhance the sustainability of key downstream markets. The goal is to eliminate 100% of Scope 1 emissions from calcium aluminate cement production by two methods: firstly by capturing $CO_2$ and using it as a raw material for the construction market, and secondly, by displacing the existing fossil fuel with green hydrogen.

Imerys' new Furnace Innovation Technology (FIT) can replace fossil fuels and achieve emissions-free combustion, while residual process $CO_2$ can be mineralized with waste calcium sources using Imerys' deep know-how to produce precipitated calcium carbonate (PCC). Pilot trials have additionally shown that raw materials coming from circular supply can displace 30% of raw materials reducing resource inputs and further reducing GHG emissions.

## Managing the product portfolio

Imerys is currently estimating the GHG emissions associated with producing the main product families in the Group's portfolio. The objective is to identify and direct specific emission reduction actions to specific products in Imerys product portfolio. This will help steer production towards a low-carbon portfolio, and manage growth while reducing emissions. This transversal lever is also activated to reduce Scope 3 emissions (see section 1.2.2.4, paragraph "Reducing Scope 3 emissions" of the present chapter).

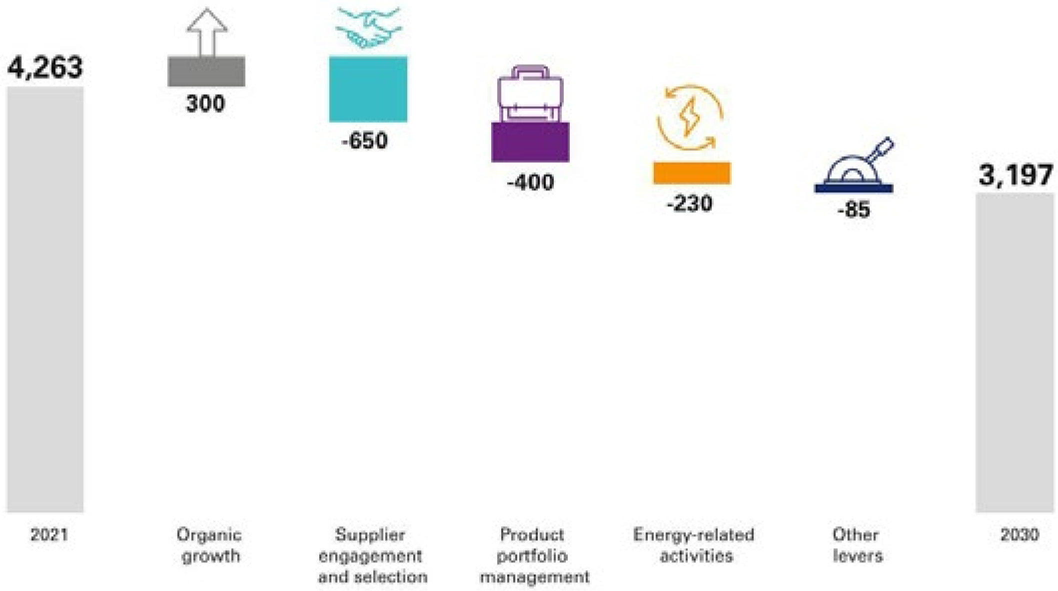
### Reducing Scope 3 emissions

Scope 3 is considered an indirect source of emissions, which based on Imerys' estimation as described below, represents about 71% of total Group emissions. In 2024, Scope 3 emissions from categories included in SBTi target[1] were estimated to represent about 3,637 kt$CO_2$eq i.e. around 82% of the Group's total Scope 3 emissions.

Three key decarbonization levers have been identified to help reduce Imerys' Scope 3 emissions across the value chain and meet the 2030 target. Additional reductions in Scope 3 emissions at the Group level will be achieved by reducing waste, business travel and employee commuting. These key reduction actions are gathered under "other levers" in the figure here after. The expected reduction potential of each of the three decarbonization levers was estimated using a top-down approach.

| Energy-related activities | Managing our product portfolio | Working with suppliers |
|---|---|---|

### Decarbonization levers to reduce Scope 3 GHG emissions by 25% by 2030 (kt$CO_2$eq)




1 Purchased goods and services, capital goods, fuel and energy related activities, upstream and downstream transportation and distribution, waste generated in operations, business travel, employee commuting, and investments

## Working with suppliers

Imerys is taking action to reduce Scope 3 emissions, focusing as a priority on purchased goods and services, as this category accounts for nearly 40% of the total Scope 3 emissions estimated in 2024.

Imerys has engaged with suppliers to commit to science-based targets (SBTs) and develop decarbonization roadmaps for their products. Approximately 800 suppliers, representing 52% of the Group's suppliers by spend, currently have emissions reduction targets.

Imerys prioritizes supplier engagement on environmental issues and collaboratively identifies GHG emissions reduction initiatives. Imerys has planned workshops with key suppliers to understand their emission reduction goals and provide support via carbon footprint calculation assistance. This approach ensures focusing resources on suppliers with the highest environmental impact and the greatest potential for positive change through collaboration.

### Select suppliers which offer less emissions-intensive goods or services

Imerys most emissions-intensive purchased goods and services — **2030**

Organize suppliers regional workshops on sustainability issues to identify a list of Scope 3 reduction initiatives

*Expected outcome*

**~150 kt$CO_2$eq/year**

Expected GHG emissions reduction compared to baseline

*Results at end 2024*

**40 initiatives**

Identified with a potential emissions reduction

### Modal switch in transportation

Main upstream & downstream transportation routes — **2030**

Prioritizing low-carbon transport routes, such as switching from road to barge transportation

*Expected outcome*

**~250 kt$CO_2$eq/year**

Expected GHG emissions reduction compared to baseline

## Managing Imerys product portfolio

As well as managing the transition to a low-carbon product portfolio, Imerys is changing the specifications of existing products so that more local and bio-based raw materials, and more second-hand or recycled materials from the circular economy may be used (refer to disclosure requirement [ESRS E5] of the present chapter). This lever will also help to reduce Scope 1 and 2 emissions, as highlighted in section 1.2.2.4, paragraph "Reducing Scope 1 & 2 emissions" of the present chapter.

### Develop innovative and eco-design products

Imerys most-emitting product families — **2030**

Reformulate Imerys most emissions-intensive products by substituting raw materials and production processes

*Expected outcome*

**Scope 1: 40 kt$CO_2$eq/year**

**Scope 3: 400 kt$CO_2$eq/year**

Expected reduction compared to baseline

*Results at end 2024*

- Two projects under review

### Energy-related activities

Scope 3 emissions from fuel and energy-related activities are expected to decrease due to Imerys' energy-related decarbonization projects, such as reducing energy consumption via energy efficiency or using organic waste when sourcing bioenergy, ensuring that the carbon-intensity of its pre-treatment and transportation is as low as possible.

## 1.2.2.5. Targets, actions and resources regarding climate change adaptation [E1-3, E1-4]

In 2024, based on the updated results of the double materiality assessment, Imerys has established climate change adaptation and to draw up an action plan to enhance resilience against the climate-change effects the Group is facing and their future amplification. Those effects are developed under section 1.2.2.4 above. This objective has been reviewed and validated by the Board and Strategy and Sustainability Committee.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Improve resilience to physical climate risks by assessing Group operations according to climate scenarios and developing adaptation strategies for the three most significant risks | 2024<br>0% | **NEW** | 2025<br>100% |

### Assess physical risks for each site

All industrial sites **2025**

*Expected outcome*

**100%**
*of sites assessed*

*Results at end 2024*

Refer to section 1.2.2.2, paragraph "Physical risks assessment" of the present chapter

### Define adaptation plans for 3 pilot sites

Top risk sites **2025**

*Expected outcome*

- Cover risks related to heat stress, water stress and flooding

In 2024, the Capex related to climate change adaptation actions amounted to €280 thousands.

## 1.2.2.6. Metrics related to climate change [E1-5 to E1-9]

### Energy consumption and mix [E1-5]

| Energy consumption and mix | Unit | 2024 | 2023 | % variation (2024/2023) |
|---|---|---|---|---|
| Fuel consumption from coal and coal products | MWh | 280,353 | 316,450 | -11% |
| Fuel consumption from crude oil and petroleum products | MWh | 1,258,625 | 1,443,302 | -13% |
| Fuel consumption from natural gas | MWh | 2,706,720 | 2,492,483 | 9% |
| Fuel consumption from other fossil sources | MWh | 6,078 | 6,532 | -7% |
| Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources | MWh | 1,708,182 | 2,014,322 | -15% |
| **Total fossil energy consumption** | **MWh** | **5,959,957** | **6,273,089** | **-5%** |
| **Share of fossil sources in total energy consumption** | **%** | **89.6%** | **93.7%** | **-4%** |
| Consumption from nuclear sources | MWh | 274,593 | 118,370 | 132% |
| **Share of consumption from nuclear sources in total energy consumption** | **%** | **4.1%** | **1.8%** | **133%** |
| Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) | MWh | 246,959 | 207,409 | 19% |
| Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources | MWh | 168,162 | 92,811 | 81% |
| The consumption of self-generated non-fuel renewable energy | MWh | 85 | 103 | -17% |
| **Total renewable energy consumption** | **MWh** | **415,206** | **300,323** | **38%** |

| Energy consumption and mix | Unit | 2024 | 2023 | % variation (2024/2023) |
|---|---|---|---|---|
| **Share of renewable sources in total energy consumption** | **%** | **6.2%** | **4.5%** | **39%** |
| **Total energy consumption** | **MWh** | **6,649,756** | **6,691,781** | **-1%** |

Imerys' total energy consumption decreased by 1% in 2024 as compared to 2023, primarily as a result of the I-Nergize program, which promotes the implementation of actions that improve energy efficiency, as well as by specific site-driven energy efficiency actions. These measures also helped counterbalance the Group's overall organic growth, as well as the additional energy consumption required when switching from the use of fossil fuels to biomass in kilns and mobile equipment. In line with Imerys' decarbonization efforts, the consumption of energy from renewable sources continues to increase progressively since 2018, achieving over 6% in 2024. Consumption of renewable electricity increased by 81% in 2024, following the inauguration of new solar photovoltaic installations in two Imerys sites, as well as the purchase of Guarantees of Origin in several countries.

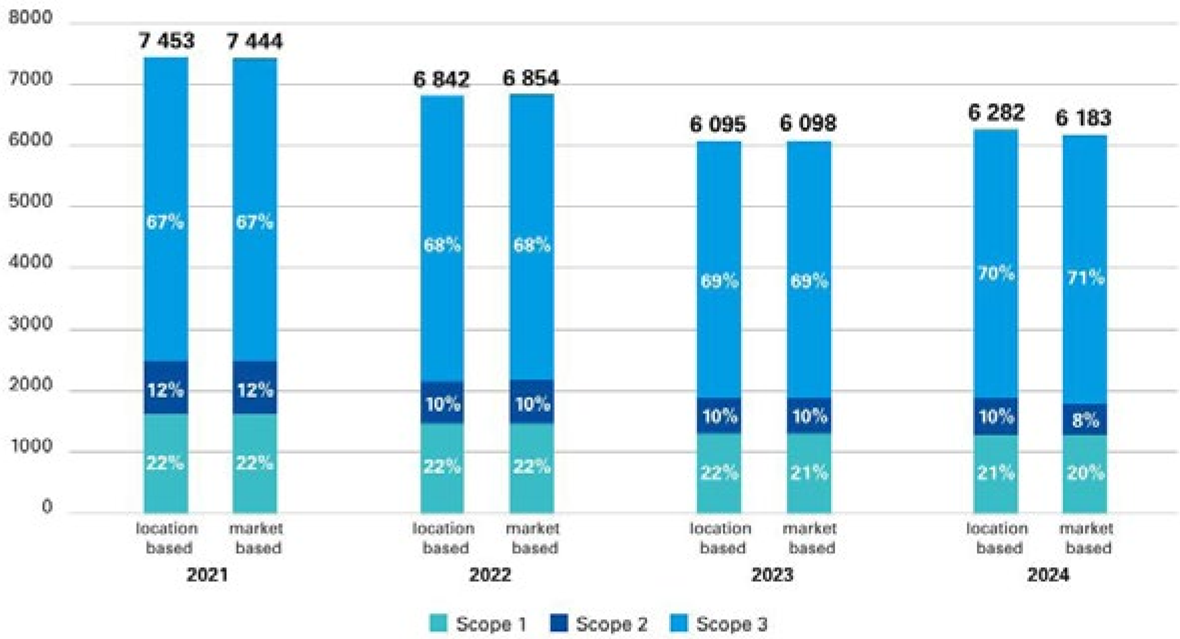
Natural gas consumption increased by 9% in 2024, mainly due to a switch from oil use to natural gas. At the same time, coal and oil consumption dropped by 11% and 13%, respectively; whilst biomass use increased by 19% as a result of nine sites currently using biomass.

| Energy intensity per net revenue | Unit | 2024 | 2023 |
|---|---|---|---|
| Total energy consumption per net revenue (from activities in high climate impact sectors) | MWh/€ million | 1,845 | 1,764 |
| Net revenue from activities in high climate impact sectors used to calculate energy intensity | € million | 3,605 | 3,794 |

The energy intensity per net revenue increased by nearly 5% due to adjustments in the product and price mix.

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

**Gross Scopes 1, 2, 3 and Total GHG emissions (ktCO$_2$eq)**




| Total GHG emissions (Scope 1, 2, 3) | Unit | 2024 | 2023 |
|---|---|---|---|
| Total GHG emissions (Scope 1, 2 & 3 location-based) | ktCO$_2$eq | 6,282 | 6,095 |
| Total GHG emissions (Scope 1, 2 & 3 market-based) | ktCO$_2$eq | 6,183 | 6,098 |

## Scope 1 and 2 Emissions

| | | Retrospective | | | | Milestones and target years | |
|---|---|---|---|---|---|---|---|
| Metric | Unit | 2024 | 2023 | Baseline 2021 | % variation 2023-2024 | 2030[1] | Annual % target / base year |
| *SCOPE 1 GHG EMISSIONS* | | | | | | | |
| Gross Scope 1 GHG emissions | $ktCO_2eq$ | 1,281 | 1,311 | 1,609 | -2% | -25% | -2.7% |
| Percentage of Scope 1 GHG emissions from regulated emission trading schemes [2] | % | 34% | 37% | 32% | - | - | - |
| *SCOPE 2 GHG EMISSIONS* | | | | | | | |
| Gross location-based Scope 2 GHG emissions | $ktCO_2eq$ | 601 | 585 | 886 | 3% | - | - |
| Gross market-based Scope 2 GHG emissions | $ktCO_2eq$ | 502 | 587 | 877 | -15% | -74% | -8.2% |
| **TOTAL GHG EMISSIONS (SCOPE 1 & 2)** | | | | | | | |
| Total Scope 1 & 2 GHG emissions (location-based) | $ktCO_2eq$ | 1,882 | 1,895 | 2,494 | -1% | - | - |
| Total Scope 1 & 2 GHG emissions (market-based) | $ktCO_2eq$ | 1,783 | 1,898 | 2,485 | -6% | -42% | -4.7% |

The Group's Scope 1 and 2 GHG emissions were equal to 1,783 $ktCO_2eq$ in 2024, which represents a 28% decrease since the base year 2021. The Group's Scope 1 and 2 GHG emissions equalled 495 $tCO_2eq$ per € million of revenue in 2024, which represents a 32% decrease since 2018.

As compared to 2023, total Scope 1 and 2 GHG emissions decreased by 115 $ktCO_2eq$ in absolute terms, which represents a 6% reduction, mainly thanks to following decarbonization levers: energy efficiency measures, substitution of emissions-intensive fossil fuels with biofuels or natural gas when biomass is unavailable, as well as a Group-wide program dedicated to the purchase of low-carbon and renewable electricity. As a result, Scope 1 emissions were cut by 2% (30 $ktCO_2eq$) and Scope 2 were 15% lower (85 $ktCO_2eq$, market-based).

The divestment of some Imerys sites accounts for 3% of GHG emissions reduction in 2024 compared to 2023.

| GHG intensity per net revenue | Unit | 2024 | 2023 |
|---|---|---|---|
| Total GHG emissions (Scope 1, 2 & 3 location-based) per net revenue | $tCO_2eq$/€ million | 1743 | 1607 |
| Total GHG emissions (Scope 1, 2 & 3 market-based) per net revenue | $tCO_2eq$/€ million | 1715 | 1607 |
| Total net revenue (Financial statements) used to calculate GHG Intensity | € million | 3,605 | 3,794 |

1 Imerys does not currently have specific separate Scope 1 and Scope 2 GHG emissions reduction targets. The 42% reduction target covers both Scopes 1 & 2 combined. Estimated reductions per Scope are provided in the table, yet they are not fixed figures and could potentially change as decarbonization projects continue to be studied and deployed across the Group.

2 In 2023, Imerys submitted a new climate target for validation by SBTi. Minor adjustments have been made on historical data presented here (2021 baseline and 2022) compared with that presented in 2021 and 2022 to comply with the updated methodology for non-$CO_2$ emissions as well as corrections for minor reporting errors that were not significant at Group level. To properly follow Imerys baseline and trajectory, it was decided to correct this data prior to the SBTi submission.

## Scope 3 Emissions

Scope 3 GHG emissions are calculated on a cradle-to-gate basis by multiplying activity data by specific emission factors. The GHG Protocol outlines recommended Scope 3 calculation methods. Each method corresponds to a certain level of precision and the minimal requirements depend on the level of materiality assessed for each emission category. Within a GHG emissions category, several approaches can be used for subcategories. The GHG Protocol methods used by Imerys to calculate Scope 3 emissions are presented in the disclosure requirement [ESRS 2 BP-2] of the present chapter. For more details about the calculation of each category, please refer to section 1.6.2 [MDR-M] of the present chapter.

| Significant Scope 3 GHG emissions | | | Retrospective | | | Milestones and target years | |
|---|---|---|---|---|---|---|---|
| **Metric** | **Unit** | **2024** | **2023** | **Baseline 2021** | **% variation 2023-2024** | **2030** | **Annual % target/ base year** |
| **Total significant gross indirect (Scope 3) GHG emissions** | **ktCO2eq** | **4,400** | **4,200** | **4,959** | **5%** | - | - |
| 1. Purchased goods and services | $ktCO_2eq$ | 1,660 | 1,663 | 2,105 | 0% | - | - |
| 2. Capital Goods | $ktCO_2eq$ | 263 | 291 | 210 | -10% | | |
| 3. Fuel and energy-related activities (not included in Scope1 or Scope 2) [1] | $ktCO_2eq$ | 355 | 377 | 514 | -6% | - | - |
| 4. Upstream transportation and distribution | $ktCO_2eq$ | 355 | 209 | 346 | 70% | - | - |
| 5. Waste generated in operations | $ktCO_2eq$ | 58 | 54 | 58 | 8% | - | - |
| 6. Business traveling | | | | | | | |
| 7. Employee commuting | | | | | | | |
| 8. Upstream leased assets | $ktCO_2eq$ | NS[2] | NS | NS | - | - | - |
| 9. Downstream transportation and distribution | $ktCO_2eq$ | 773 | 669 | 784 | 16% | - | - |
| 10. Processing of sold products[3] | $ktCO_2eq$ | 593 | 559 | 552 | 6% | - | - |
| 11. Use of the sold products | $ktCO_2eq$ | NS | NS | NS | - | - | - |
| 12. End-of-life treatment of sold products[4] | $ktCO_2eq$ | 170 | 186 | 144 | -9% | - | - |
| 13. Downstream leased assets | $ktCO_2eq$ | NS | NS | NS | - | - | - |
| 14. Franchises | $ktCO_2eq$ | NS | NS | NS | - | - | - |
| 15. Investments | $ktCO_2eq$ | 173 | 191 | 248 | -9% | - | - |
| **Total significant gross indirect (Scope 3) GHG emissions included in SBTi target** | **ktCO2eq** | **3,637** | **3,454** | **4,263** | **5%** | **-25%** | **-2.8%** |

Scope 3 emissions represent about 71% of total Group GHG emissions. The Group's overall Scope 3 GHG emissions equalled 4,400 $ktCO_2eq$ in 2024, and 3,637 $ktCO_2eq$ for the categories covered by Imerys' emissions reduction target. This represents an 11% decrease for total Scope 3 emissions and a 15% reduction for the categories covered by the target, as compared to the base year 2021.

Overall Scope 3 emissions and the emission categories covered by the reduction target increased by 5% in 2024, with a respective increase of 200 $ktCO_2eq$ and 183 $ktCO_2eq$, as compared to 2023. This increase is the result of significant improvements made to data monitoring in 2024, which led to more comprehensive accounting in certain Scope 3 categories, particularly upstream and downstream transportation and distribution.

Imerys pursue its monitoring action within the value chain. As of the end of 2024, 52% of the Group suppliers by spend, representing approximately 800 suppliers, had emissions reduction targets. This translates into more than 58% of Imerys' Scope 3 emissions from purchasing categories covered by reduction targets.

1 This category's emission factors were updated for the estimation of 2023 and 2024 figures, as to include the latest available data published by the International Energy Agency (IEA).
2 NS: Non Significant
3 This category does not fall within the Scope of the Scope 3 SBTi objective
4 This category does not fall within the Scope of the Scope 3 SBTi objective

**Internal carbon pricing [E1-8]**

Since 2020, Imerys has set a shadow price for carbon as part of its commitment to tackling climate change. The aim is to define a value, voluntarily set, in order to quantify the economic risk of its greenhouse gas emissions and to establish this value as a criterion in project decisions. This shadow price is applicable to: (i) all projects related to changes in energy consumption or energy efficiency; (ii) all projects worth more than €150,000 which have an impact on GHG emissions to the tune of +/-1,000 $tCO_2eq$. This price is integrated into project profitability analyses and is used to highlight the risks or capital gains associated with them, and to guide investment decisions towards the most virtuous projects. The same approach is used for mergers and acquisitions together with the prospect's $tCO_2eq$/sales ratio so as to favor acquisitions that serve the Group's emissions reduction target. It has demonstrated its relevance and usefulness for several projects, and has another advantage: by requiring that the associated emissions be calculated for each project, it encourages the upskilling of teams in this area, and sets the reduction of greenhouse gas emissions at the heart of all decision-making processes.

The internal carbon shadow price was originally set at €50/$tCO_2eq$ in 2020, and it was further increased to €80/$tCO_2eq$ in 2022, in line with global market trends.

For research and development projects, the carbon shadow price has been determined based on the future $CO_2$ prices estimated by the International Energy Agency (IEA) in its World Energy Outlook published in 2021, following different scenarios. The value of €100/$tCO_2eq$ has been selected to be aligned with Imerys' commitments on climate change, i.e. following the 1.5°C trajectory with a medium term time horizon (5-10 years).

| Types of internal carbon prices | Prices applied (€/ $tCO_2eq$) | Scope description |
|---|---|---|
| Capex | 80 | – all projects related to changes in energy consumption or energy efficiency;<br>– all projects worth more than €150,000 which have an impact on GHG emissions to the tune of +/- 1,000 $tCO_2eq$;<br>– mergers and acquisitions |
| Research and Development (R&D) investment | 100 | – all new product development projects requiring Science & Technology resources and scored according the Group SustainAgility Solutions Assessment (SSA) framework |

### 1.2.2.7. Anticipated financial effects from material physical and transition risks and potential climate-related opportunities [E1-9]

| Imerys total asset value at material risk | Short-term (2030) | Medium-term(2040) | Long-term(2050) |
|---|---|---|---|
| **Physical risks (% of total asset value[1] at risk)** | 4.1 to 4.6% | 5.0 to 5.8% | 5.7 to 6.9% |

These figures were obtained as described in the methodology in disclosure requirement [ESRS 2 IRO-1 - E1] of the present chapter. The range of results is linked to the various climate scenarios assessed.

## 1.2.3. Environmental management and pollution prevention [ESRS E2]

The Group's industrial activities have environmental implications, particularly when it comes to air and water quality. Production processes generate various air emissions potentially degrading local air quality in the vicinity of operational sites, and may affect local communities living nearby areas. This impact on air quality is a direct result of the diverse pollutants released during production operations.

Similarly, the Group's activities pose risks to water resources. In the event of accidental discharges, effluents containing hazardous substances or suspended matter can be released, potentially compromising both surface and groundwater quality.

These environmental negative impacts underscore the importance of implementing robust pollution control measures and maintaining stringent environmental policies to mitigate the effects on air and water resources in the areas where the Group operates.

Therefore, Imerys is committed to complying with relevant environmental laws and regulations, to implementing an Environmental Management System (EMS) to minimizing negative environmental impacts, to continuously improving environmental performance associated with its operations, to ensuring an environmental conservation approach with defined objectives and targets and to raising internal and external awareness of environmental impacts through training and other efforts.

Note: the following disclosure describes Imerys commitments related to the management of water quality, as outlined in [ESRS E2]. The water conservation is detailed in [ESRS] E3 of the present chapter, and provides more information on this matter.

1 Total asset value is defined by the total insured value, which is equal to property value in addition to business interruption value (i.e. loss in revenues and inventory).

### 1.2.3.1. Processes to identify and assess material pollution impacts, risks and opportunities [IRO-1]

Imerys has initiated a comprehensive process to identify material impacts, risks, and opportunities related to pollution across its operations and value chain. The Group has launched a specific site-level survey to screen its locations and business activities, focusing on pollutants listed in Annex II of the E-PRTR[1] for air, water, and soil. This screening process aims to acquire a more thorough understanding of the particular stakes at each site. The methodology involved establishing an initial baseline, taking into account the multiple standards and metrics that exist worldwide for assessing and measuring pollutants. However, Imerys has recognized the need to implement a harmonized method to assess each substance consistently across all sites before disclosing Group-wide data. This approach ensures the accuracy and reliability of the reported information while preventing potential consistency discrepancies. Imerys acknowledges that this baseline is a starting point and plans to progressively refine and improve it over time, demonstrating a commitment to ongoing enhancement of its pollution-related impact assessment and reporting processes. The results of this assessment were used in the double materiality analysis described in the disclosure requirement [ESRS 2 SBM-3] of the present chapter. The material impact and risks related to pollution of air and water are presented in the table hereafter.

Note: although Imerys has not conducted specific, targeted consultations with local affected communities on this matter, the Group is committed to establishing constructive dialogue with its stakeholders living nearby. The Group takes into account potential complaints linked to air and water pollution through the established grievance mechanism, as described in the disclosure requirements [ESRS 2 IRO-2 E3].

| ESRS E2. Pollution | | | |
|---|---|---|---|
| Materiality | Location within the value chain | Description of the IRO | Time horizon |
| **Sub-topic: Pollution of air** | | | |
| ⊖ Actual negative impact | ● Own operations<br>(SET[2] and RAC[3] business activities) | Group activities cause air pollution and may deteriorate local air quality as a result of the various air emissions generated during production processes. | ●●○ Medium |
| **Sub-topic: Pollution of water** | | | |
| ⊖ Actual negative impact | ● Own operations<br>(all activities) | Group activities impact water quality (surface and/or and ground) in the event of accidental release of effluents containing hazardous substances or suspended matter. | ●○○ Short |
| R Risk | ● Own operations<br>(all activities) | The Group may be exposed to financial risks related to increasingly stringent pollution prevention and control requirements or reputational damage in case of pollution incident or non-compliance with new pollution regulations. | ●○○ Short |

1 Annex II of the E-PRTR (European Pollutant Release and Transfer Register) is a comprehensive list of pollutants that are required to be reported by industrial facilities in the European Union. It includes a wide range of substances categorized by their potential impacts on air, water, and soil, serving as a standardized reference for environmental reporting and monitoring across Europe.
2 SET refers to Solution for Energy Transition as described in chapter 1 of the present report
3 RAC refers to Refractory, Abrasives and Construction as described in chapter 1 of the present report

## 1.2.3.2. Policies related to pollution [E2-1]

Environmental stewardship rests upon the implementation of a robust Environmental Management System (EMS), which is a key factor in improving operational excellence while reducing environmental impacts. Imerys requires each operation to have an effective EMS enabling it to identify and establish controls for significant environmental risks. The mandatory EMS requirements for all activities are covered by Group-wide environmental policies, which include eight pillars aligned to the core elements of international standards for environmental management systems. The policies on this matter specify the internal requirements applicable to all operations.

These internal policies cover air and water pollution amongst other topics. They define the responsibilities of site level and senior managers and Environment, Health and Safety (EHS) personnel in managing and controlling potential exposures and risks in order to prevent adverse environmental impacts and to reduce the environmental footprint of Imerys operations.

Additionally, the Group has a structured internal environmental incident reporting policy that supports sites to implement the right process to prevent and mitigate the impact and to report it in the internal system. Each incident is investigated as per Group policy, and corrective action plans are pursued until closure.


The policy applies to the same scope as the consolidated financial statements. Newly acquired sites are included, from the date of acquisition except in exceptional circumstances as described in [ESRS 2] of the present chapter. Warehouses, offices and laboratories are excluded, when not attached to an industrial site. At Group level, the implementation of these policies is supervised by the Sustainability Committee. For more information about the governance over environmental topics, refer to the disclosure requirement [ESRS 2 GOV-1] of the present chapter.

In 2024, the internal water policy was revised to specifically respond to the management of wastewater and stormwater, encompassing water treatment, pollution prevention and response. This policy was developed based on the leading international water reporting standard[1] for the mining and metals industry by the International Council on Mining and Metals (ICMM), with the aim to mitigate the impacts Imerys have or could have on water quality and quantity, mainly contamination from effluents and overconsumption; and manage the risks related to the sensitivity of water resources and identify the main levers to reduce operational water demand.

Within its value chain, the Group implemented since 2018 a comprehensive responsible purchasing policy, based on Supplier Environmental, Social and Governance Standards ("Supplier ESG Standards"). This policy, which covers a broad panel of environmental topics, asks specifically the suppliers to:

- Comply with all applicable environmental regulations;
- Implement an environmental management system in line with recognized international standards;
- Ensure that all environmental risks and impacts are identified, assessed and mitigated to as low as reasonably practicable;
- Optimize the use of natural resources to reduce their environmental footprint by preventing pollution, managing waste and implement the "reduce, reuse and recycle" principle;
- Promote the development and dissemination of environmentally friendly practices, including through effective and appropriate training.

1 International Council on Mining and Metals (ICMM), "Water Reporting: Good Practice Guide", 2nd edition (2021)

### 1.2.3.3. Actions and resources related to water pollution [E2-2]

#### Environmental Maturity Matrix (EMM)

To support the development of an effective environmental management system across the Group, an Environmental Maturity Matrix covering the critical elements of environmental management is used. This maturity matrix, as with the other continuous improvement matrices deployed across the Group, is used to assess site level environmental performance and guide the development of action plans.

The Group Environment, Health and Safety (EHS) Audit Team conducts annually comprehensive and independent onsite Environmental compliance audits using the Environmental Maturity Matrix tool. Every year around 20 sites are audited for all their environmental conformity by internal environmental experts.

#### External environmental certifications

In addition to implementation of mandatory EMS requirements, which are fully aligned with international standards, the Group maintains a number of ISO 14001 and Eco-Management and Audit Scheme (EMAS) certifications. As of the end of 2024, 44% of Group operations are ISO 14001 or EMAS certified by external certification organizations.

#### Regulatory monitoring

Since 2018, the Group has used an integrated solution to manage environmental legal compliance and regulatory monitoring. This solution supports the development of updated environmental legal registers, with regular alerts, register updates and regulatory assistance by environmental legal specialists for each country. To date 89% of Imerys sites spread across 25+ countries from all continents are covered by dedicated tools for monitoring regulatory compliance. In addition to the new solution developed at Group level, sites across Imerys use other tools to support regulatory monitoring locally. Imerys tracks and analyzes environmental performance on a quarterly and annual basis at all levels of the Group.

#### Air and water quality monitoring

Water quality parameters are generally monitored at each discharge point of the operation, ensuring compliance with site-specific threshold values mandated by local regulations. In instances where regulatory requirements do not specify quality parameters, sites are strongly required to adhere to the Group's internal standards. These internal standards establish comprehensive criteria, with a strategic plan extending to 2030, aimed at achieving stringent water quality thresholds. The focus areas include total suspended solids, temperature, and pH levels, reflecting the Group's commitment to responsible water management and environmental stewardship across all its operations.

Monitoring of atmospheric emission and dust fallout are periodically carried out in order to prevent air emission pollutants. Emission thresholds are established in accordance with applicable local regulations, ensuring compliance with stringent environmental standards. Sites assess their air emissions based on materiality, employing specific methods and tools tailored to their operational context. The most frequently measured parameters include dust, sulfur oxides ($SO_x$), and nitrogen oxides ($NO_x$), with additional parameters evaluated based on site-specific environmental considerations. The frequency of measurements is aligned with local regulatory requirements and site-specific environmental challenges. This approach ranges from continuous online monitoring to regular periodic assessments.

#### Management of environmental incidents

The Group's ultimate aim is to have zero environmental incidents, but when they do occur, each incident is thoroughly investigated as an opportunity to learn and prevent recurrence. The Group has implemented a comprehensive environmental incident reporting policy with the primary objective of fostering continuous improvement. This policy relies on a dedicated database to enhance the understanding of the types and root causes of environmental incidents occurring within operations. The incident management framework is designed to achieve multiple critical objectives:

- Mitigate environmental impacts and prevent recurrence of incidents through thorough analysis and corrective actions;
- Ensure accurate classification and recording of all environmental incidents for consistent tracking and trend analysis;
- Facilitate prompt notification and conduct appropriate investigations to address issues in a timely manner;
- Implement proper responses to non-conformities.

#### Training, awareness and communication

Training and awareness of the Group environmental management are achieved through various communication and training activities. Local initiatives also arise at regional, hub or site level and include job-related environmental training. These training courses can be followed in several formats depending on the target audience and in different languages (as applicable):

| Training activities | Targeted audience | Description |
|---|---|---|
| Environmental Learning Path | Newcomers | The "Caring for our Planet" module is intended to introduce the key principles and tools of the Group environmental management system. |
| EHS auditor training | EHS and mining and resource planning auditors | This training conducted annually aims at aligning and calibrating the Group internal auditors team members (update on the Imerys requirements, auditing process and techniques, ...). This is required for all auditors existing and new members joining the group auditor team. |
| Digital courses on the Imerys Learning Hub | All Imerys employees | The Group provides its employees with an e-learning platform offering a broad choice of on-demand addition contents:<br>– Basic environmental modules<br>– Specific environmental Learning modules<br>– Rebroadcast of internal environmental courses, webinars and virtual classes focusing on specific environmental themes. |
| Imerys Connect day | All Imerys employees | Imerys Connect Day is an annual event organized by the Group and typically brings together Imerys employees from around the world to foster connection, collaboration, and engagement within the Group. The Connect Day usually includes various activities such as:<br>– Presentations on Imerys EHS performance and recognition of employee achievements<br>– Workshops and discussions on key EHS topics<br>– Team-building exercises<br>– Networking opportunities for staff from different regions and departments<br>The event aims to strengthen the Group culture and promote a sense of unity across the global organization, with a focus on health, safety and environmental topics. |

## Impact, risks and opportunities

Launch of a specific site-level survey to screen pollutants

All Imerys operational sites — **2024**

*Expected outcome*
All applicable pollutants listed in Annex II of the E-PRTR for air and water assessed and identified at site level

*Results at end 2024*

**6**
pollutants listed in Annex II of the E-PRTR for air identified

**2**
pollutants listed in Annex II of the E-PRTR for water identified

## EHS audits

On-site EHS compliance audits

Imerys selected sites — **Recurrent action**

*Expected outcome*

**29**
audits planned in 2024

*Results at end 2024*

**28**
audits completed (97% of the plan)

## Training and awareness

Training program on pollution management

Targeted audience:
- EHS employees and site management teams
- All Imerys employees

**2024**

*Expected outcome*
Harmonized practices and employees sensitization on resource management

*Results at end 2024*
- Deployment of a workshop on environmental incident response, enabled to train all Imerys employees in 2024 during Imerys Connect Day and raise awareness on environmental issues.
- Water webinars on storm water management and water quality and ecosystems, in association with an external expert organization (OiEau)

**Financial resources allocated to the prevention and mitigation of pollution**

Imerys has initiated a comprehensive process to collect, consolidate, verify and report the Capex and Opex related to air and water pollution management. Categories have been established for prevention and incident management based on the mitigation hierarchy framework. The Prevention category captures all Opex and Capex associated with avoiding or reducing pollution emissions. Incident management, on the other hand, covers all Opex and Capex related to the restoration phase following environmental incidents. In 2024, Imerys focused on defining the process, adapting the reporting tools, training employees and verifying the reported data. Disclosure of the data will occur from 2025, once the system, data and tools for reporting and verifying Capex and Opex related to air and water pollution have been validated.

## 1.2.3.4. Targets related to air and water pollution [E2-3]

The environmental management target is to ensure that 100% of Group sites have assessed their environmental maturity by 2025. The environmental maturity matrix, organized around Imerys' policies, allows the sites to measure their performance and then to deploy the continuous improvement program. The matrix is updated when environmental policies are updated.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Reduce environmental impacts by assessing the maturity level of sites against environmental management requirements[1] | 2022<br>0% | 100% | 2025<br>100% |

In 2024, based on the updated results of the double materiality assessment, Imerys has established a new objective to manage air pollutants emissions. This voluntary (i.e. not mandatory as per a specific regulatory framework) objective has been reviewed and validated by the Board and Strategy and Sustainability Committees.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Reduce the risk of air pollution by ensuring priority sites[2] define site specific air emission management plans. | 2024<br>0% | NEW | 2025<br>100% |

The Group has implemented a methodology for identifying priority sites with respect to air emissions and water pollution across its industrial facilities. This identification process is based on two key criteria:

1. Instances where substance threshold exceedances affect more than two sites within the Group, and

2. Sites that exceed the thresholds specified in the European Pollutant Release and Transfer Register (E-PRTR) list.

### Priority sites on water pollution

Based on this assessment, at the end of 2024, none of the Group's sites currently qualify as priority sites for water emissions. However, the Group has identified two sites that exceed certain E-PRTR thresholds, which represents less than 2% of Imerys operational facilities. These sites are located in France and China.

For these two sites, the Group has developed and implemented specific action plans to address the threshold exceedances. These plans are subject to a rigorous management and monitoring process at multiple levels of the organization: site-specific, Business Area, and Group-wide. This multi-tiered approach ensures comprehensive oversight, facilitates the effective implementation of necessary improvements, and demonstrates the Group's commitment to responsible water management and environmental stewardship across its operations.

### Priority sites on air emissions

At the Group level, air pollutants, primarily sulfur oxides (SOx) and nitrogen oxides (NOx), are predominantly associated with operations in the Refractory, Abrasives, and Construction and the Solutions for Energy Transition Business Areas. This distinctiveness is attributable to the specific industrial processes inherent to these operations.

It is noteworthy that all sites exceeding the E-PRTR thresholds maintain compliance with their respective local regulations, underscoring the Group's commitment to regulatory adherence across its global operations. The identified priority sites represent seven out of the Group's industrial facilities worldwide, accounting for less than 5% of the Group's total industrial footprint. These sites are located in Western Europe and in the United States.

This focused approach to identifying and managing priority sites for water pollution and air emissions demonstrates the Group's proactive stance on environmental stewardship and its dedication to continuous improvement in air and water quality management across its diverse operations.

1 Environmental Management requirement as defined by Imerys policies and measured by the environmental maturity matrix, which is based on leading international environmental standards.

2 The list of priority sites with respect to air emissions is based on (1) Instances where substance threshold exceedances affect more than two sites within the Group (2) sites that exceed the thresholds specified in the European Pollutant Release and Transfer Register (E-PRTR) list.

## 1.2.3.5. Metrics related to air and water pollution [E2-4]

| Metrics related to air emissions | Unit | 2024 | 2023 |
|---|---|---|---|
| Number of sites exceeding E-PRTR Threshold of SOx (NEW) | # | 5 | 5 |
| Total SOx emissions | tonnes | 2,356 | 2,248 |
| Number of sites exceeding E-PRTR Threshold of NOx (NEW) | # | 4 | 4 |
| Total NOx emissions | tonnes | 4,354 | 5,503 |

By default, the Group's SOx and NOx emissions from fuels are automatically calculated on a monthly basis with the fuel consumption and the SOx and NOx emission factors specific to fuel from the EPA AP 42 database. SOx and NOx emissions can also be reported manually at site level for the operations having a continuous monitoring of these pollutants at all points of rejection. In other cases, SOx and NOx are calculated (and documented) by the site by taking into account the sulfur content of the raw materials, the additives and the process conditions (desulfurization rate). Some sites have continuous monitoring of the SOx and NOx emissions at all points of rejection. At the end of 2024, the decrease of NOx emissions is mainly due to the divestiture of the Group paper assets. The Group continues its efforts to manage and reduce both SOx and NOx emissions related to its operations through an internal policy, technological upgrades and investments.

## 1.2.3.6. Financial effects from material pollution-related risks and opportunities [E2-6]

| Metrics related to environmental incidents | Unit | 2024 | 2023 |
|---|---|---|---|
| Number of Level 4 & 5 environmental incidents | # | 0 | 1[1] |
| Capex allocated to the prevention and mitigation major environmental incidents (NEW) | € thousands | 806 | 388 |
| Opex allocated to the prevention and mitigation of major and critical environmental incidents (NEW) | € thousands | 221 | 1 |
| *of which Opex amounts allocated to fines (NEW)* | *€ thousands* | *90* | *0* |

The severity of environmental incidents involving Imerys is determined by evaluating the environmental, financial, regulatory and reputational consequences and can be:

- **Level 1** - None or no lasting environmental impact, requiring no remediation;
- **Level 2** - Minimal and no permanent harm to the environment or minor breach of Group standards;
- **Level 3** - Limited short-term harm to the environment, occasional breach of Group standards, or formal complaint by a third party;
- **Level 4** - Medium term harm to the environment, repeated breach of Group standards;
- **Level 5** - Long term harm to the environment, severe breach of Group standards.

According to [ESRS E2-6, DP 40b], Imerys discloses in the table above the Capex and Opex of its "Major" environmental incidents, corresponding to Level 4 or Level 5 incidents according to its internal reporting protocol. There were no Level 4 or 5 environmental incident in 2024. The Capex and Opex reported above correspond to the expenses due to a water-related environmental incident that occurred in 2023.

As of December 31, 2024, Imerys reported €115.5 million for environmental and dismantling provisions, as indicated in Chapter 6, Note 23.2 "Other Provisions" of the present document. This covers Imerys' environmental obligations for pollution remediation, as well as its obligations to dismantle plants.

1 This number has been corrected relative to the 2023 Universal Registration Document. In 2024, the number of incidents has been restated to be compliant with the disclosure requirements of the CSRD, which stipulates disclosing significant environmental incidents, i.e. only Imerys Level 4 & Level 5 incidents.

## 1.2.4. Water management [ESRS E3]

Water is a shared and finite resource, with high social, cultural, environmental and economical value. It is a basic human right and vital for ecosystems. Demand for water is rising owing to rapid population growth, urbanization and increasing water needs from industry sectors, resulting in an increasing pressure on resource accessibility. A global approach to water management is a necessity to secure its access and its quality for the future generations, but also to preserve aquatic ecosystems that depend on the resource.

Imerys, like any other extractive Group, has an impact on water resources as part of the Group's operations, which require water for ore extraction and processing. Furthermore, water plays a crucial role in controlling the air emissions of operations, such as dust suppression in quarries or aqueous chemical adjuvants for flue gas treatment. Some Imerys activities may impact natural water flows and may influence groundwater levels depending on the hydrogeological context. The Group is committed to ensuring effective water management and to minimizing the impact of its operations, both in terms of quantity and quality.

Note: the following disclosure describes Imerys commitments related to water conservation, as outlined in ESRS E3. The management of water quality is detailed in ESRS E2. Please refer to section 1.2.3.3 of the present chapter for more information on this matter.

### 1.2.4.1. Impacts, risks and opportunities related to water resources [SBM-3]

Imerys conducted an initial high-level identification of its material impacts, risks and opportunities during its double materiality analysis (refer to disclosure requirement [ESRS 2 SBM-3] of the present chapter) and highlighted the material aspect of water management motivated by the importance of the resource for production and the volumes to be managed to maintain the activities, on the one hand, and taking into account the risk of water shortage in high stressed areas where Imerys' activities are located, on the other hand.

The Group has screened its sites to acquire a more granular understanding of the particular stakes in relation to water resources and to prioritize water management efforts. Priority sites have been identified using categories as per the following:

- The priority sites based on water volumes refer to sites where the yearly water withdrawal and/or water discharge of operations exceeds 1 million cubic meters of water, regardless of the water stress risk.
- The priority sites in water stress level 5 refer to sites located in basins rated as at extremely high risk (5) of water stress. As such these sites are also considered to be exposed to material water-related risks together with the priority sites identified previously.

Imerys uses the WWF Water Risk Filter and particularly the "Baseline Water Stress", corresponding to the ratio of the overall surface and groundwater withdrawal compared to the available renewable water at local scale. In 2024, with respect to the baseline assessment results, a majority of sites identified within this category are located along the Pacific coast of North and South America, around the Mediterranean Sea, India and South Africa. A majority of the priority sites in water stress level 5 areas (52%) do not use substantial amounts of water for mineral processing (less than 10,000 $m^3$/year), as they involve dry processes. For such operations, water use is typically limited to dust management and/or sanitary use.

In 2024, 48 sites were identified within the priority list, whether as operations with high potential of resource use reduction or operational efficiency (18 sites) and/or located in basins rated as at extremely high risk (5) of water stress (31 sites).

In addition to the physical risks mentioned above, the Group pursues the understanding of its impacts on affected communities and other stakeholders potentially concerned by considering economical, social and cultural vulnerability criteria in the assessment. Refer to disclosure requirement [ESRS S3] of the present chapter for more information.

| ESRS E3. Water and marine resources | | | |
|---|---|---|---|
| Materiality | Location within the value chain | Description of the IRO | Time horizon |
| **Sub-topic: Water depletion** | | | |
| ⊖ Potential negative impact | ● Own operations (all activities) | Group activities may have an impact on water reserves in the event of inefficient water management (excessive consumption, withdrawal or lack of recycling), potentially contributing to water scarcity or tension over water availability. | ●●● Long |

### 1.2.4.2. Policies related to water and marine resources [E3-1]

The Group has specific internal policies related to water management that respond to the following challenges:

- management of wastewater and stormwater (including water treatment, and pollution prevention and response), which is dealt in [ESRS E2] of the present chapter; and
- water conservation (including sourcing and use of water in Imerys' operations), which is treated under the present section and relates to the sustainability matter identified as "water depletion" in the double materiality analysis.

These policies were developed based on the leading international water reporting standard for the mining and metals industry by the International Council on Mining and Metals (ICMM)[1], with two main objectives: improve water reporting and mitigate the Group water footprint, specifically in areas at water risk.

The policies apply to the same scope as the consolidated financial statements, with a progressive implementation starting with the priority sites defined above, and full coverage to be achieved by 2030.

- Newly acquired sites are included, from the date of acquisition except in exceptional circumstances.
- Warehouses, offices and laboratories are excluded, when not attached to an industrial site.

At Group level, the implementation of these policies is supervised by the Sustainability Committee. For more information about the governance over environmental topics, please refer to the disclosure requirement [ESRS 2 GOV-1] of the present chapter.

Within its value chain, the Group implemented since 2018 a comprehensive responsible purchasing policy, based on Supplier Environmental, Social and Governance Standards ("Supplier ESG Standards"). This policy, which covers a broad panel of environmental topics, asks specifically the suppliers to:

- Comply with all applicable environmental regulations;
- Ensure that all environmental risks and impacts (including on water resources) are identified, assessed and mitigated to as low as reasonably practicable;
- Optimize the use of natural resources, including water, to reduce their environmental footprint by implementing the "reduce, reuse and recycle" principle;
- Promote the development and dissemination of environmentally friendly practices, including water use, through effective and appropriate training.

1 International Council on Mining and Metals (ICMM), "Water Reporting: Good Practice Guide", 2nd edition (2021)

### 1.2.4.3. Actions and resources related to water management [E3-2]

In 2023, Imerys launched a water roadmap to be deployed in two phases corresponding to the two objectives set for the water policies as described in the disclosure requirement [E3-1] of the present chapter:

- the phase 1 (period 2023-2025) will be dedicated to strengthening data management, improving the overall water reporting methods, including quantitative and qualitative data on the water balance, while assessing water-related risks of priority sites to establish a strong baseline.
- the phase 2 (period after 2025) will be dedicated to achieve long term targets as defined at the end of 2025 for preserving the water resource and reducing water-related risk within the Group.

In this trajectory, water working groups have been organized, involving representatives from all Imerys' Business Areas to ensure a proper understanding of the new reporting requirements, identify areas for improvement, and set up new indicators and KPIs to follow the progress of the operations in their water management journey.

#### Actions taken in 2024 to improve water management

#### Operational water risks and opportunities assessment at site level

Priority sites based on water volume (>1M $m^3$/year withdrawal and/or discharge)

Priority sites in water stress with >10k $m^3$/year

2024

*Expected outcome*

Evaluate operational risks exposure, likelihood, operational vulnerability while identifying potential opportunities for water savings and business resilience.

*Results at end 2024*

**100%**

of priority sites managing large water volumes have conducted the assessment.

**93%**

of priority sites in water stress with significant yearly water withdrawal conducted the assessment.

#### Development of a set of tools to harmonize water management between sites

All Imerys operational sites

2024

*Expected outcome*

Referencing standardized practices for water volumes estimation or measurements, to harmonize methodologies across the various regions where Imerys operates.

*Results at end 2024*

Water toolkit and Water Management Plan

Creation of reference documents to uniformize water reporting methodologies and management practices.

#### Training and awareness

Targeted audience: EHS employees and site management teams

2024

*Expected outcome*

Water webinars on the main resource management challenges and impacts of the extractive sector, in association with an external expert organization (OiEau)

*Results at end 2024*

**4 webinars**

conducted on water balance and reporting, water quality and impact on ecosystems, water sampling methods, stormwater management

### Refinement of risks and opportunities on priority sites

Specific actions of risks assessment and opportunities identification have been conducted on priority sites, to evaluate operational risks exposure, likelihood, operational vulnerability while identifying potential opportunities for water savings and business resilience. The methodology, co-developed with an external partner, OiEau, relies first on the assessment of hydrological basin risks, where information is capted from recognized databases, such as WWF Water Risk Filter[1], WRI Aqueduct 4.0[2] and Copernicus Climate Atlas[3], to evaluate the risk exposure on a large scale, main regional challenges of water management and future trends. In a second step, the analysis is performed at the operational scale, to evaluate the current dependencies, vulnerabilities and risks associated to the site's water management.

Both risks analyses cover 3 main themes, physical, regulatory and reputational risks, declined into sub-themes, which are for example the lack of water, excess of water and water quality for the physical risks.

Lastly, the assessment covers the opportunities potentials and feasibility, split into 6 types of opportunities, water savings, marketing, societal, financial, technological and environmental opportunities.The operational risks & opportunities analysis have been deployed on the priority sites.

- All priority sites managing large water volumes have conducted the assessment in 2024.
- Regarding the sites in extremely high water stress, the operational risks & opportunities assessment have been performed on sites with significant yearly water withdrawal superior to the median withdrawal value of Imerys operations (more than 10 000 $m^3$/year), susceptible to be exposed to higher risk than the other water stress sites that have minimal impact on water availability or low dependency on the resource. Among the shortlist of water stress sites (15 sites, including 2 sites divested in 2024), 14 have performed the analysis this year.

### Training and awareness

In 2024, the Group focused efforts on enhancing internal knowledge sharing by actively promoting a training program dedicated to water management and facilitate the deployment of the new policies described in [ESRS E3-1] above. More specifically, four training sessions through virtual classes covering water balance assessment, water quality impact on ecosystems, water sampling and stormwater management happened during the year. The main targeted audience encompassed site directors, and managers/engineers from production, process, maintenance, mining and EHS functions.

### Water toolkits

In addition to the water webinars, a set of tools, including water toolkits referencing standardized practices for water volumes estimation or measurements, was shared at Group scale to harmonize methodologies across the various regions where Imerys operates. A second document was deployed, a water management plan template, structuring local initiatives aspiring to water sobriety and operational risks mitigation.

## 1.2.4.4. Targets related to water [E3-3]

In order to meet Imerys objective of enhancing water data management, and thus better understand its impacts, risks, and opportunities related to water depletion, the Group has decided to set a "water reporting progress indicator" focused on its priority sites to measure progress based on the number of reporting indicators made available and the accuracy of their reporting, with a target set at 100% in 2025 compared to the 2022 baseline. Details of the calculation methodology and definitions are included in appendix 1.6.2 of the present chapter.

Together with close monitoring of operations located in extremely high water stress areas, these initiatives should lead to the identification of all potential levers, plus understanding and applying Best Available Technologies (BATs) where possible, to minimize the impact on water availability at watershed scale while improving the Group's business resilience to face more frequent drought episodes. Priority sites (as defined in above in disclosure requirement [ESRS 2 IRO-1 - E3]) are sites with water withdrawal and/or discharge that exceeds 1 million $m^3$ per year, plus the sites located in extremely high water stress areas.

| Group objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Improve water management by ensuring priority sites comply with new water reporting requirements | 2022<br>0% | 55% | 2025<br>100% |

1 The World Wide Fund for Nature (WWF) Water Risk Filter is a free online tool that enables companies and investors to explore, assess, and respond to water risks.
2 The World Resources Institute (WRI) Aqueduct 4.0 consist of 13 baseline water risk indicators spanning quantity, quality, and reputational concerns.
3 The Copernicus Interactive Climate Atlas (C3S Atlas) is a platform to exploring 30 variables from 8 state-of-the-art datasets.

W

| Metric related to water resource | Unit | 2024 | 2023 |
|---|---|---|---|
| **WATER WITHDRAWALS** | | | |
| *Total operational water withdrawals* | *million m3* | *45.670* | *50.477* |
| Water withdrawn from water groundwater | million $m^3$ | 21.470 | 24.142 |
| Water withdrawn from suppliers | million $m^3$ | 4.233 | 3.725 |
| Water withdrawn from surface water | million $m^3$ | 8.225 | 15.628 |
| Water withdrawn from rainwater (NEW) | million $m^3$ | 10.023 | - |
| Water withdrawn from other sources (including seawater) | million $m^3$ | 1.719 | 6.982 |
| **WATER CONSUMPTION** | | | |
| Total water consumption (NEW) | million $m^3$ | 15.999 | - |
| Of which total water consumption in areas of extremely high water stress (NEW) | million $m^3$ | 2.087 | - |
| **OTHER METRICS** | | | |
| Total water stored (NEW) | million $m^3$ | 21.096 | - |
| Total water recycled and reused (NEW) | million $m^3$ | 96.166 | - |
| Water intensity of revenue | $m^3$/€ million | 12,669 | 13,304 |

## Water withdrawals

The total operational water withdrawals have noticeably decreased in 2024 by 9.5%, mostly affected by the divestment of paper assets.

In 2024, the Group introduced a new “rainwater” indicator to better dissociate the natural water flows, either intercepted via dedicated infrastructure or passively in quarries, from the water flows pumped directly into natural reservoirs (e.g. creeks rivers, lakes) outside the boundaries of sites, now exclusively reported as surface water withdrawals.

The two main sources of water withdrawals at Imerys are groundwater and rainwater, which together account for 69% of total operational water withdrawals.

## Water reused and recycled

Although industrial processes are very heterogeneous, water reuse and recycling is a relatively widespread practice at Imerys sites. The sites using thermal processes are the main water recyclers, followed by wet processing plants where a part of the process water is recovered and reused in the same process step or for a different use, such as dust abatement. In 2024, at Group level, two thirds of the water supply for operations were provided by recycled water, compared to one third of water withdrawn from external sources and natural reservoirs.

## Water consumption

Water used for the operations, if not recycled or discharged, is considered as consumed. Water consumption at Imerys represents around 11% of the overall water inflows to supply the operations (both withdrawal and recycling volumes). The main consumption items are grouped into 5 distinct categories, namely the moisture contained in the finished products, forced water evaporation, typically occurring in the drying steps of mineral processing, natural water evaporation, in the ponds and old pits used as water reservoirs for the plants, water losses from leaks, and water used to transport extracted minerals by pipeline over long distances.

Sites in extremely high water stress areas represent 13% of the overall Group water consumption.

## 1.2.5. Biodiversity and land rehabilitation [ESRS E4]

Imerys has a major responsibility to take into account effectively, and in a timely manner, all the impacts of its operations on natural habitats, fauna and flora, at all sites and in all stages of a quarry life cycle, while striving for no-net-loss of biodiversity. This is why, Imerys has designed and is implementing its biodiversity program and internal policy to contribute to SDG 15 "to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss".

### 1.2.5.1. Processes to identify impacts, risks, dependencies and opportunities [IRO-1]

At Group level, Imerys conducted a high-level identification of its actual and potential material impacts, risks and opportunities related to biodiversity and ecosystems at its own sites and in the upstream value chain in the context of the double materiality analysis (refer to disclosure requirement [ESRS 2 SBM-3] of the present chapter). Imerys has also completed detailed biodiversity impact, risk, dependencies and opportunity assessments, which are detailed below.

#### Assessment of impacts

Imerys conducted a comprehensive assessment of its biodiversity footprint utilizing the Corporate Biodiversity Footprint (CBF) methodology, developed by Iceberg Data Lab. This methodology measures the extent of a Group's impact on biodiversity, taking into account the major direct pressures identified by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES)[1], including habitat loss and degradation, species overexploitation, climate change, pollution, Invasive Alien Species (IAS).

Consultation on potential impacts on the natural environment, potentially impacts on affected communities and potential impacts on ecosystem services are conducted in accordance with the specifications of local regulations.

#### Assessment of dependencies

In 2024, Imerys conducted a comprehensive screening analysis of all industrial sites (quarries and plants) to evaluate its dependencies on ecosystem services using two advanced tools:

- ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure). ENCORE is a free, online tool that helps organizations explore their exposure to nature-related risks and understand their dependencies and impacts on nature. It is maintained and continuously improved by Global Canopy, UNEP FI and UNEP-WCMC, who together form the ENCORE Partnership;
- Biodiversity Risk Filter (BRF). The BRF, developed by WWF, is a free online tool aimed to help companies and financial institutions to assess and act on biodiversity-related risks and opportunities across their operations, value chain and investments.

The analysis, focused on the extractive sector, assessed 21 ecosystem services.

#### Assessment of risks and opportunities

Imerys completed a comprehensive analysis of risks and opportunities through an integrated approach, combining external and internal data sources. The Group conducted a global screening of all industrial sites using the Biodiversity Risk Filter (BRF) tool, complemented by site-specific internal information including ecological atlases, biodiversity action plans, data on disturbed and rehabilitated areas, and environmental incident reports.

1 The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) is an independent intergovernmental body established by States to strengthen the science-policy interface for biodiversity and ecosystem services for the conservation and sustainable use of biodiversity, long-term human well-being and sustainable development.

## 1.2.5.2. Material impacts, risks and opportunities [SBM-3, E4-1]

### Identified impacts, dependencies, risks and opportunities

The assessment of impacts, dependencies, risks and opportunities described in the above section highlighted actual and potential negative impacts, positive impacts as well as risks related to biodiversity in association with Imerys operations.

With regard to negative impacts, of the five main pressures on biodiversity, Imerys contributes to three key pressures: habitat degradation, climate change, and pollution, encompassing Imerys' own operations and to some extent its upstream value chain (Scopes 1, 2, and 3 upstream). The results of the impact study revealed that the material negative impact of Imerys' activities is concentrated in Scope 1, due to extractive activities (quarries/mines) and the associated land occupation and disturbance. No material impacts were identified regarding desertification and soil sealing.

The Group also generates positive biodiversity impacts by preserving, recreating, and restoring ecological areas that have not been artificialized in the long term. During rehabilitation works, the Group has the potential to diversify habitats, creating a mosaic of local ecosystems capable of supporting a wide range of species or contributing to the recovery of threatened species. Furthermore, collaboration with other stakeholders can lead to the development of sustainable landscapes that meet both ecological and social needs for nature preservation and sustainable land use.

With regard to risk, the analysis identified physical, reputational, and regulatory risks associated with biodiversity and ecosystems. Reputational factors emerged as the most significant, with media scrutiny posing the highest risk, based on the BRF. Secondary risks included increasing regulatory obligations and elevated rehabilitation and permitting costs.

The assessment using ENCORE identified a degree of dependency on "rainfall pattern regulation" services to mitigate flood risks and potential operational damages and on the "water purification" services. Other dependencies identified include water flow regulation, water supply and flood control. The dependencies have not been assessed to present material risks to the Group strategy and business model.

| ESRS E4. Biodiversity and ecosystems | | | |
|---|---|---|---|
| **Materiality** | **Location within the value chain** | **Description of the IRO** | **Time horizon** |
| *Sub-topic: Pressure on biodiversity* | | | |
| ⊖ Actual negative impact | ● Own operations (Extractive activities) | Group activities contribute to the drivers of biodiversity loss, including land-use change, introduction of invasive alien species, pollution, and climate change. | ●○○ Short |
| R Risk | ● Own operations (Extractive activities) | The Group may be exposed to financial risks related to increasingly stringent nature-related regulations and/or requirements, including rehabilitation, or to reputational damage in case of damage to biodiversity. | ●○○ Short |
| *Sub-topic: Impact/loss of biodiversity* | | | |
| ⊕ Actual positive impact | Own operations (Extractive activities) | Group activities have positive impacts on local biodiversity in the event that rehabilitation and restoration efforts result in land uses with greater biodiversity value than the initial land uses. | ●●● Long |
| ⊖ Potential negative impact | Own operations (Extractive activities) | Group activities may have negative impacts on the state of species and/or on the extent and condition of ecosystems as a result of quarrying operations. | ●●○ Medium |
| R Risk | Own operations (Extractive activities) | The Group may be exposed to financial risks related to increasingly stringent nature-related regulations and/or requirements, including rehabilitation, or to reputational damage in case of damage to biodiversity. | ●○○ Short |

### Mapping of Imerys site's local ecological context

The main impact caused by extractive activities is land disturbance. In order to identify actual and potential land disturbance impacts and to reduce Group impacts on habitat loss Imerys has assessed the sensitivity of the habitat location across its operations.

In 2019, Imerys started collecting ecological data from its sites in France to assess the challenges and their ecological quality, as well as their potential to promote local ecosystems, fauna and flora. Since then, Imerys has completed sensitivity mapping for all the Group's quarries across the world using the World Database of Protected Areas[1]. In 2022, this mapping was updated and extended to cover all Group sites, including plants.

In 2023, in partnership with Imerys, PatriNat developed a methodology[2] to characterize and map the ecological context of sites through multi-thematic cartographic assessments. This collaborative work generated a set of ecological atlases covering every Imerys quarry and plant site around the world. These atlases present an assessment of the ecological context within a 5km radius buffer around the coordinates point of each site. They represent geospatial layers for the Geographic Information System (GIS)-based land management system and were used to produce a global dashboard with all sites' results.

1 World Database on Protected Areas (WDPA) is the most comprehensive global database on terrestrial and marine protected areas. It is a joint project between the United Nations Environment Programme (UNEP) and the International Union for Conservation of Nature (IUCN), managed by UNEP World Conservation Monitoring Centre (UNEP-WCMC).

2 The cartographic evaluation of the ecological background of sites on an international scale is a methodological framework created by PatriNat and described here: https://www.patrinat.fr/fr/cartographic-evaluation-ecological-background-sites-international-scale-7269

### Mapping results and site prioritization approach based on impacts

Imerys has implemented an approach to prioritizing its operational sites based on their potential ecological impact, leveraging the comprehensive mapping of ecological contexts. The Group has established a clear definition of priority sites founded on impact materiality, focusing on extractive operations that meet at least one of the following criteria:

- High-volume extraction: sites that extract more than one million tons of material annually, regardless of their geographical location.
- Proximity to protected areas: sites situated within a 5 km radius of areas classified as International Union for Conservation of Nature (IUCN) categories I, II, or III, which represent areas of significant ecological importance.
- Biodiversity hotspot proximity: sites located in recognized biodiversity hotspots and within a 5 km radius of areas classified as IUCN category IV.

The Group has not identified any sites located in current IUCN categories I, II, or III areas. The Group has identified 6 extractive sites that are situated within a 5 km radius of biodiversity-sensitive areas classified by the IUCN as Category I, II, or III.

None of the priority sites are in, or directly connected to the IUCN sensitive areas, and thus they have no direct negative impact on these biodiversity sensitive areas. However, it is possible that they may have indirect negative impacts on ecosystems or species. Additional analysis will be conducted in the future to determine the nature of the potential impacts.

Imerys has set specific objectives and targets for these priority sites as described in the disclosure requirement [E4-4] below.

An additional 9 plants (non-extractives based activities) are also located within a radius of 5km of a biodiversity-sensitive area classified by the IUCN as Category I, II, or III. While the biodiversity impact is considered not material for such operations, specific action plans are nevertheless established for these facilities.

## 1.2.5.3. Policies related to biodiversity and ecosystems [E4-2]

Imerys has a comprehensive biodiversity program, underpinned by its environmental policy governing biodiversity management across all operational sites. This policy establishes a robust framework for addressing the impacts and opportunities of operations on natural habitats, fauna, and flora, with the ultimate goal of achieving no-net-loss of biodiversity. The policy is aligned with Imerys' environmental charter and sets minimum standards that apply to all sites, regardless of local regulatory requirements.

Key features of the biodiversity management policy include:

- Implementation of the mitigation hierarchy: this approach prioritizes avoiding and minimizing negative impacts on biodiversity, followed by restoration and offsetting measures where necessary.
- Life cycle approach: the policy addresses impacts throughout the entire plant and mine life cycle, from exploration and development to operation and closure.
- Protected areas management: sites located near protected areas are required to adapt their management, rehabilitation activities, and Biodiversity Action Plan (BAP) objectives to align with the ecological goals of these sensitive areas.
- Comprehensive impact assessment: the policy considers Imerys' main impacts on nature and addresses the five primary global drivers of biodiversity loss described in the section above.
- Action framework: the policy defines expected actions in terms of management systems and governance, enhancement of global and local biodiversity knowledge, implementation of the mitigation hierarchy, employee and contractor training and engagement with local communities and other stakeholders.
- Internal tools and support: implementation is supported by a suite of internal tools described in the section below and designed to assist sites in assessing their biodiversity impacts and in developing appropriate management strategies.

Furthermore, Imerys has integrated specific measures for managing Invasive Alien Species (IAS) and reducing chemical inputs into its comprehensive environmental strategy. These initiatives are fully incorporated into the environmental management system policy, as detailed in disclosure requirement [ESRS E2-1]. Additionally, their implementation and effectiveness are systematically monitored and evaluated through the environmental maturity matrix, which is elaborated in disclosure requirement [ESRS E2-2].

At Group level, the implementation of this policy is supervised by the Sustainability Committee. For more information about the governance over environmental topics, please refer to the disclosure requirement [ESRS 2 GOV-1].

### 1.2.5.4. Actions and resources related to biodiversity and ecosystems [E4-3]

Imerys has expressed its commitment to act to protect biodiversity by joining act4nature International, an initiative spearheaded by “Entreprises pour l’Environnement” (EpE) and various partners. Act4nature International aims to galvanize businesses to protect, promote, and restore biodiversity. Through this engagement, Imerys aligns itself with a global network of companies dedicated to biodiversity conservation.

These commitments cover the period 2021-2024 and are built around four pillars as described in the figure below.

**Raise awareness, train, mobilize andengage Imerys’ key stakeholders**

Disseminate ecological data obtained during research and monitoring surveys to open global databases.
Build biodiversity awareness with internal and external stakeholders through events and contest.

**95%**
**COMPLETION 2024**

**Initiate and conduct studies and research on biodiversity and conservation**

Work closely with academic and scientific organizations to measure, preserve and restore biodiversity in quarries.
SYMBIOSIS is a Nature based solution that support reforestation & ECOVAL allows to measure biodiversity loss and gain

**87%**
**COMPLETION 2024**


**Take concrete action to fight against the major causes of biodiversity loss**

Habitat destruction: Implement the mitigation hierarchy[1], and improve biodiversity knowledge to restore natural habitats.

Deploy concrete actions to fight against Invasive Alien Species (IAS), Climate Change and Pollution.

**92%**
**COMPLETION 2024**

**Continuously improve Imerys’ environmental strategy and scientific expertise**

In close collaboration with UAR Patrimoine Naturel, develop tools to evaluate, integrate and monitor the operational management of biodiversity in quarries and plants.

**100%**
**COMPLETION 2024**

1 Measures taken to avoid, minimize and offset impacts on nature

## Strategy and scientific partnerships

Since 2018, Imerys has maintained a strategic scientific partnership with PatriNat, a consortium comprising the French National Museum of Natural History (MNHN), the French Agency for Biodiversity (OFB), the National Center for Scientific Research (CNRS), and the French Research Institute for Development (IRD). This collaboration provides crucial external oversight of the Group's biodiversity program and facilitates the mobilization of scientific expertise to enhance biodiversity knowledge and actions across Imerys sites. The partnership's success and ongoing value have been affirmed through renewals in 2021 and 2024, with the current agreement extending through 2028.

In accordance with the Group biodiversity policy described in the section above, Imerys and PatriNat co-developed internal guidelines that outline the actions to be implemented to ensure the protection of biodiversity throughout the life of Group quarries.

Imerys and PatriNat also designed internal tools that facilitate the concrete implementation and monitoring of biodiversity actions on site, in accordance with the internal policy and guidelines:

- Biodiversity Maturity Matrix: this tool aims to support sites in the assessment of biodiversity performance. This matrix also offers sites the opportunity to go beyond the standards' requirements and to implement improvement actions.
- Biodiversity Toolbox: best practices guide for biodiversity management
- Biodiversity action plan (BAP) models: to facilitate the design and adapt local and concrete action plans

## Actions against the causes of biodiversity loss

As the most important pressure caused by Imerys is the degradation of habitats, three pillars actions have been implemented to control this impact.

- Improving knowledge on ecological stakes through the ecological atlas and field surveys.
- Testing ecological indicators aiming to better understand local impacts, to elaborate a set of site-specific preservation, management and ecological reclamation actions and to follow the ecological quality of sites in the long term.
- Reinforcing mitigation hierarchy implementation which is a sequential approach to manage ecological impacts that prioritizes avoiding harm, then minimizing impacts, followed by restoring affected areas, and finally offsetting any residual impacts as a last resort. Each extractive site develops a tailored Biodiversity Action Plan, considering local requirements and ecological contexts. Where feasible, a progressive rehabilitation approach is deployed, coordinating mining activities with the restoration of previously extracted areas to minimize habitat impact. The Group prioritizes the use of native species in revegetation efforts and implements prevention and control measures to reduce the presence of IAS. The mitigation hierarchy is applied sequentially, emphasizing prevention over compensation. Offsetting measures, aimed at compensating for unavoidable residual impacts, are currently in place at six of the twenty priority sites. In 2024, the Group has spent €7.2 million of its provisions for mining site restoration, as indicated in the note 22.2 “Other Provisions of its consolidated accounts”.

In addition, Imerys is actively working to reduce chemical inputs in its green areas. These reduction measures are integral components of the Biodiversity Action Plans developed for each site with quarries. The BAPs are subject to annual reviews, ensuring continuous improvement and adaptation to evolving environmental needs and scientific insights. Furthermore, recognizing the intricate relationship between climate change and biodiversity, Imerys takes a holistic approach to environmental stewardship. The Group's climate program, which complements and reinforces its biodiversity efforts, is detailed in disclosure requirement [ESRS E1].

## Scientific expertise and monitoring on site

Imerys has established a diverse array of pilot sites across different biogeographical and regulatory environments to implement long-term projects. These projects aim to:

- address biodiversity challenges,
- implement R&D programs with innovative procedures or technologies
- evaluate metrics and methodologies for measuring the success of ecological management and restoration efforts.

The Group has deployed pilot projects at sites in South America, Europe and Asia.

### 01 Case study

Local knowledge and nature-based solutions

Symbiosis is an international project bringing together scientific experts as the Institut de recherche pour le développement (IRD), local universities and Imerys for the development of nature-based solution in an effort to improve soil biochemical properties and revegetation success in rehabilitation areas with the use of symbiotic microbes. This project has led to the elaboration of scientific guidelines that support plant growth in hard conditions.

### 02 Case study

Ecological indicators

With the support of PatriNat, Imerys has tested different ecological indicators aiming to measure its footprint and the ecological state of biodiversity and ecosystems in extractive sites. ECOVAL (Ecological equivalence assessment) was deployed in various Imerys pilot sites in France. This methodology aims to compare biodiversity losses at impacted sites and the biodiversity gains in offset areas. In the long term, this allows Imerys to assess the ecological equivalence and the effectiveness of ecological operations.

### 03 Case study

Dynamic management

Two sites were selected for the European dissemination of the Belgian project LIFE in Quarries. This project aims to optimize the biodiversity potential of extractive sites by implementing a “dynamic management” of nature, recreating a network of temporary habitats in parallel with the extractive activity and ensuring a constant availability of suitable habitats for the development of nature. Biodiversity planning, management and monitoring is carried out through the BioPlanner tool[1].

1 BioPlanner, developed by Gembloux Agro-Bio Tech (University of Liège), is an interactive platform designed for managing biodiversity. It enables businesses and communities to map, monitor, and enhance areas for flora and fauna, particularly in urban or industrial settings. The platform centralizes data, measures the impact of actions, and promotes team participation, supporting adaptive and collaborative biodiversity management

## Raise awareness, train, mobilize and engage stakeholders

Imerys has implemented activities with internal and external stakeholders to initiate greater awareness of biodiversity.

| Awareness action | Targeted population | Description of the awareness action and outputs |
|---|---|---|
| Educational film on biodiversity | All Imerys employees | The Group developed a short and educational film to share details on the program and raise awareness of biodiversity internally. |
| Internal environmental community | All Imerys employees | An internal environmental community has been created, and the Group has organized educational sessions on biodiversity with employees to support the dissemination of good practices and biodiversity knowledge across the Group. |
| Internal digital webinars | All Imerys employees | In 2024, several webinars open to all Imerys employees took place in order to train teams on environmental themes, the ecological mapping, to identify ecological challenges specific to each site and how to address them effectively by adapting BAPs. |
| Digital training course | Mandatory for all senior managers as well as specific positions and operational teams | To support the objective to avoid a net loss, prevent and reduce negative impacts, Imerys continues to train staff on biodiversity, including through a digital training course recently updated. |
| | Openly available to all other employees | At the end of 2024, 1764[1] employees have enrolled in this training. The main objective of the module is the understanding of the impacts of Imerys' activities on biodiversity and to gain insight into the strategy and actions implemented. |
| SD Challenge | All Imerys employees | With the development of the Group biodiversity roadmap, sites across Imerys have continued to develop local initiatives aimed at supporting biodiversity and promoting innovative rehabilitation projects, both during and after mining activities. |
| | | In 2024, 22 biodiversity and rehabilitation initiatives participated in the SD Challenge. The winning project in the United States was recognized for the rehabilitation mining master plan. |

### 04 Case study

Biodiversity workshop during Imerys Connect Day

In 2021, an interactive workshop "Caring for our planet" focusing on biodiversity was conducted across all Group sites, offices and laboratories. The attendees took part in dedicated workshops that explained the causes of biodiversity loss and consisted of collaborative sessions where all employees worked to identify actions and solutions to reduce potential impacts. Through this workshop, approximately over 13,000 employees were trained on core biodiversity topics and an awareness-raising tool was developed for future local training events.

Furthermore, as a result of the scientific studies undertaken in collaboration with partners at Imerys sites, 2661 data entries on biodiversity were published in The National Heritage Inventory Information System (SINP) and in the Global Biodiversity Information Facility (GBIF), thereby contributing to the dissemination of biodiversity data made available for scientists and citizens all over the world.

*For more information on Imerys' 2021-2024 Act4nature International commitments, see www.imerys.com*

1 Number of participants that have enrolled the course since December 2023

### 1.2.5.5. Targets related to biodiversity and ecosystems [E4-4]

Imerys' mid-term biodiversity target for 2023-2025 comprises two key components, designed to drive comprehensive progress in biodiversity management:

- Act4nature commitment fulfilment (60% of overall performance): achieve all objectives defined within the Act4nature commitment, as detailed in disclosure requirement [ESRS E4-2].
- Internal biodiversity audits (40% of overall performance): conduct 20 internal biodiversity audits on priority sites, as specified in disclosure requirement [ESRS E4-1, SBM-3]. These audits are crucial for assessing and improving biodiversity management practices across Imerys' most ecologically significant operations.

In line with the commitments made and in order to ensure the continued integration of biodiversity stakes within Group operations, the Sustainability Committee ensures formal oversight of Imerys' biodiversity performance, with regular progress reviews. In addition, a dedicated Steering Committee with PatriNat has been established to govern the activities undertaken within the scientific partnership. Involving the Imerys Chief Sustainability Officer and one of the PatriNat Directors, it meets twice a year to follow up on the program's status and to define actions to reach Group targets.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Reduce impact on biodiversity by fulfilling Imerys Act4nature commitments and conducting biodiversity audits on 20 priority sites | 2022<br>0 | 82% | 2025<br>100% |

| Act4Nature International commitments progress | Unit | 2024 | 2023 |
|---|---|---|---|
| Continuously improve Imerys' environmental strategy and scientific expertise | % | 100% | 90% |
| Actions against biodiversity loss | % | 92% | 69% |
| Initiate and conduct studies and research on biodiversity and its preservation | % | 87% | 69% |
| Raise awareness, train and involve internal and external stakeholders | % | 95% | 75% |
| **Overall progress** | **%** | **94%** | **75%** |

By the end of 2024, Imerys successfully completed 94% of the actions outlined in its 2021-2024 act4nature commitments, demonstrating significant progress in its biodiversity conservation efforts. This high completion rate underscores the Group's dedication to environmental stewardship and its ability to effectively implement biodiversity initiatives across its operations. Key achievements include the deployment of the internal policy across the Group, research and development programs and raising awareness of employees.

Earlier in the year, Imerys reaffirmed its commitment to biodiversity by renewing its signature related to the ten common goals of act4nature International. Building on its previous successes, the Group has outlined its roadmap and targets for the coming years. These renewed commitments reflect Imerys' integration of biodiversity within its strategy and business model and reflect it evolving approach to biodiversity management, incorporating lessons learned and aligning with the latest scientific insights and best practices in the field. The validation of this new commitment by act4nature is anticipated in 2025.

| Biodiversity internal audits progress | Unit | 2024 | 2023 |
|---|---|---|---|
| Number of biodiversity audits conducted on priority sites | # | 13 | 6 |
| **Overall progress** | **%** | **65%** | **30%** |

As of the end of 2024, Imerys has made significant strides in its biodiversity program, conducting 13 comprehensive audits, including three sites within 5 km of sensitive areas, achieving 65% progress towards its 2025 target. The audited sites demonstrated an average maturity score of 69%, reflecting a robust approach to biodiversity management and knowledge.

The results of the audits highlight areas for improvement and will be used to reinforce mitigation strategies and enhance communication measures. The program's development has substantially enhanced Imerys' technical and scientific understanding of biodiversity, enabling the Group to implement targeted actions addressing specific challenges identified in its commitments.

### 1.2.5.6. Metrics related to biodiversity and ecosystems change [E4-5]

Imerys is committed to reducing its environmental impact and moving towards a no net loss of biodiversity across its operations. Recognizing the complexity of ecosystems and the multifaceted nature of biodiversity, the Group acknowledges that, unlike climate change impacts which can be measured in $CO_2$ equivalents, biodiversity lacks a single, universal metric. This complexity necessitates a more nuanced and comprehensive approach to biodiversity assessment and management.

### Biodiversity indicators investigation

To address this challenge, Imerys has embarked on an ambitious initiative to test and implement various biodiversity indicators. These indicators are crucial for two primary purposes: to accurately measure and understand the Group's impact on nature, and to assess the state of biodiversity in areas where Imerys operates. This approach enables the Group to develop targeted and effective Biodiversity Action Plans, ensuring that conservation efforts are data-driven and tailored to specific ecological contexts.

Since 2018, Imerys has been conducting extensive trials across its European and Asian operations, utilizing a suite of sophisticated biodiversity assessment tools:

- **IQE** (Indicateur de qualité écologique): a comprehensive ecological quality indicator
- **Ecoval** (Évaluation de l'équivalence écologique): an assessment tool for ecological equivalence
- **PERSICAIRE** (Pressions Etat Réponses des Sites en Contexte Anthropisé: Inventaire Rapide et Evaluation): a rapid inventory and evaluation system for anthropized contexts
- **BIRS** (Biodiversity Indicator and Reporting System): A standardized system for biodiversity measurement and reporting

The implementation of these diverse tools will allow Imerys to capture a holistic view of biodiversity across its varied operational landscapes. By leveraging these indicators, the Group aims to refine its biodiversity management strategies, enhance decision-making processes, and demonstrate tangible progress towards its environmental commitments.

### The ecological Atlas

Imerys has developed and implemented an innovative ecological atlas, a comprehensive tool that enables the Group to identify, evaluate, and visualize critical ecological information for its operational sites. This atlas serves as a powerful decision-making aid, allowing it to:

- assess the ecological context of each site
- prioritize locations based on their environmental sensitivity
- identify associated biodiversity risks and opportunities.

Building on this foundation, Imerys has initiated a more in-depth review process for priority sites, involving detailed mapping of incidence parameters related to biodiversity changes. By leveraging this tool, the Group can tailor conservation efforts to specific site conditions, allocate resources more efficiently to areas of highest ecological importance, and monitor the effectiveness of biodiversity initiatives over time. The results for priority sites are summarized in the table below. The Group continues to work toward extending this level of detailed information to other sites within its portfolio.

| Metrics related to disturbed and rehabilitated surfaces[1] | Unit | 2024 | 2023 |
|---|---|---|---|
| Total disturbed surface of Imerys' extractive priority sites (NEW) | ha | 8937 | - |
| Total rehabilitated surface of Imerys' extractive priority sites (NEW) | ha | 3078 | - |

## 1.2.5.7. Financial effects related to biodiversity [E4-6]

As of December 31, 2024, the Group reported €136.7 million for provision for restoration, as indicated in Chapter 6 of the Universal Registration Document (note 23.2 "Other Provisions"). This covers the rehabilitation of Imerys extractive sites.

1 These indicators concern all lands owned or under land management by Imerys as of 31/12/2024

## 1.2.6. Resource use and circular economy [ESRS E5]

The growing demand for the world's mineral resources is placing ever-increasing pressure on natural systems. To participate in the reduction of this pressure, Imerys recognizes its crucial role to play in ensuring the best use of the natural resources under its stewardship, not only through resource efficiency, but also by integrating key concepts of the circular economy within the Group business model.

As the global leader in specialty minerals, Imerys aims to contribute to the circular economy through the way it sources, extracts and transforms products as well as the way it formulates and develops its solutions for the future. Additionally, the societal impacts and views of citizens are increasingly being taken into account for future decision-making on legislation that may directly affect the trajectory in the definition and implementation of circularity within the industrial minerals industry. Given the nature of the Group activities, this puts a particular focus on increasing the circularity of wastes, the value contained therein, and use of reclaimed raw materials.

Note: the following disclosure describes Imerys commitments related to minerals resource optimization and industrial waste management, as outlined in [ESRS E5]. For more information about other inflows and outflows, please refer to the following sections of the present chapter:

*ESRS E1 Climate change, which addresses, in particular, GHG emissions and energy resources - section 1.2.2.6*
*ESRS E2 Pollution, which addresses, in particular, emissions to water and air - section 1.2.3.5*
*ESRS E3 Water and marine resources, which addresses, in particular, water resource (water consumption) - section 1.2.4.5*
*ESRS E4 Biodiversity and ecosystems, which addresses, in particular, ecosystems and species - section 1.2.5.5*

### 1.2.6.1. Processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities [IRO-1]

As defined in the [ESRS E5], the circular economy model aims to maximize and maintain the value of: technical and biological resources, products and materials by creating a system that allows for: durability, optimal use or re-use, refurbishment, remanufacturing, recycling and nutrient cycling.

Hence, contributing to a more circular economy can take many forms and it is necessary to clearly identify and prioritize subjects with the most positive impact and opportunities for the Group, its value chain, society and the environment; and to minimize the negative impacts and associated risks.

This prioritization process was started by a baseline assessment completed by an internal Group of experts constituting the circular economy working group as described in [ESRS E5-2] below. Within the scope of this exercise, the Group considers all activity whereby Imerys minerals sales reduce waste in the entire value chain and materials are sold that would otherwise have become waste. The results of this assessment were used in the double materiality analysis described in disclosure requirement [ESRS 2 IRO-1] of the present chapter and confirmed by the outcomes of the circular economy study of raw materials published during the World Circular Economy Forum 2024 by the UN Environment Programme and the International Resource Panel.

Note: An integral part of the materiality assessment considers impacts on affected communities associated with resource use. Although Imerys has not conducted specific, targeted consultations with local affected communities on this matter, the Group is committed to establishing constructive dialogue with its stakeholders living nearby. The Group takes into account potential complaints through the established grievance mechanism, as described in the disclosure requirements [ESRS S3 & ESRS 2 IRO-2].

The following table summarizes the material negative impact, risk and opportunities identified as a result of the double materiality assessment.

| ESRS E5. Resource use and circular economy | | | |
|---|---|---|---|
| **Description of the IRO** | **Location within the value chain** | **Materiality** | **Time horizon** |
| *Sub-topic: Production of mineral waste* | | | |
| Group activities have negative impacts on resource use in the event of inefficient mineral resources extraction, generation of excessive mineral waste and/or improper mineral waste management. | ● Own operations (Extractive activities) | ⊖ Actual negative impact | ●○○ Short |
| The Group may be exposed to financial risks related to emerging circular economy regulations and/ or increasingly stringent mineral waste management requirements or increasing management costs. | ● Own operations (Extractive activities) | R Risk | ●○○ Short |
| *Sub-topic: Circular economy* | | | |
| The Group's development strategy aims to develop new business opportunities linked to the development of products associated with the circular economy (resource recovery, circular supply, product life extension) | ● Own operations<br>→ Downstream value chain | O Opportunity | ●●● Long |

In response to these IROs, and as per the OECD[1] definition of circular economy business model, this activity has been sub-divided into three specific circular business models most immediately relevant for Imerys:

- Circular Supply: introducing reclaimed raw materials into processes for existing products and substituting virgin raw materials.
- Resource Recovery: finding destinations for the wastes and by-products (or co-products) of Imerys' own activities.
- Product Life Extension: providing products to the market that enable downstream circular economies through enabling recycling, extending product lifecycle or reducing waste.

The outcomes of the circular economy study of raw materials published during the World Circular Economy Forum 2024 by the UN Environment Programme and the International Resource Panel enabled the Group to confirm the business opportunities related to circularity in minerals industry.

## 1.2.6.2. Policies related to resource use and circular economy [E5-1]

### Circularity policy across Imerys' operations

By committing itself through its policies to optimize the use of natural resources to reduce the environmental footprint of its activities and products, Imerys promotes a circular supply model across the business for all the mineral inflow resources used in its activity. This approach focuses on the following areas:

- Optimize the use of virgin resources,
- Maximize the use of secondary (recycled) and renewable resources

#### Mineral resources management policies

As the main source of mineral raw materials to the Group's industrial plants, mineral reserves and mineral resources are one of the Group's most important assets. Establishing and maintaining effective management of mineral resources is a core element of Imerys' business.

Mineral resources management is defined through a series of mining and resources planning policies and procedures, which are reviewed at least every five years. Each mining operation is required to have a detailed knowledge of the mineral resource through exploration drilling and sampling, a Life of Mine Plan and a detailed five-year mine plan. At Group level, the implementation of these policies is supervised by the Group's Mining and Resource Planning Vice President. For more information about the governance over environmental topics, refer to the disclosure requirement [ESRS 2 GOV-1] of the present chapter.

This approach across Imerys' 82 extractive sites enables operations to maximize the efficient use of mineral resources by mining the minimum required to meet demand while minimizing the environmental footprint.

Imerys has extensive internal policies and procedures governing the design, construction, operation, monitoring and remediation of mineral waste and tailings storage facilities (TSF). These extend to also include: promoting progressive remediation, implementation of appropriate compensation and offset measures and ensuring adequate restoration and dismantling provisions are maintained through the life and post life management periods of a site.

#### Industrial waste management policies

Due to the nature of the processing operations, the Group's activities generate relatively limited quantities of domestic and industrial waste. The Group is nevertheless committed to reducing waste generation through prevention, reduction, recycling and reuse as a means to contribute further to the United Nations SDG 12 on sustainable consumption and production patterns.

Imerys waste management policies and procedures oblige regular site level reviews of waste management for cost-effective: avoidance, minimization, and recovery opportunities (such as re-use or re-cycling). All countries in which Imerys operates have national environmental laws regulating waste. The national environmental laws of different countries apply different criteria to determine whether waste will need special management because it is toxic, corrosive, explosive, flammable, reactive or otherwise dangerous to human health or the environment. Each operation follows the national environmental laws of the country in which it is operating to determine whether a specific type of waste is regulated as hazardous waste or non-hazardous waste. Waste that is non-recyclable is either incinerated, landfilled or otherwise eliminated, consistent with the laws, regulations and practices of the region. At Group level, the implementation of these policies is supervised by the Group's Environment Vice President. For more information about the governance over environmental topics, refer to the disclosure requirement [ESRS 2 GOV-1] of the present chapter.

1 OECD: Business Models for the Circular Economy, 2019 (https://www.oecd.org/environment/business-models-for-the-circular-economy-g2g9dd62-en.htm)

### Circular economy policies extended to the value chain

#### Circularity within the upstream value chain

The relationships with Imerys' suppliers are based on mutual trust and respect. The Group has defined Code of Business Conduct and Ethics, to which it holds both itself and its suppliers accountable.

The Imerys Supplier Environmental, Social and Governance Standards outline the minimum requirements Imerys expects of its suppliers, in key environmental stewardship policies, these include:

- Ensuring all environmental risks and impacts are identified, assessed and mitigated to as low as reasonably practicable.
- Control the consumption of raw materials to maximize the sustainable use of resources.
- Limiting the production of waste and promoting waste recovery and/or elimination.

For more information about responsible purchasing policy, refer to [ESRS S2-1] of the present chapter.

#### Circularity within the downstream value chain

Imerys' minerals can be conducive to the circular economy, particularly downstream of its own perimeter through technological know-how, commercial network and strong innovation. As such, Imerys' policy promotes sustainable solutions by assessing the footprint of its products and innovating to reduce the environmental impact across their life cycle. Refer to [ESRS S4-1] of the present chapter for more information about SustainAgility Solutions Assessment policy.

The industrial minerals industry is working in partnership with downstream industries on processes to increase recyclability. The Group is committed to continue identifying recycling opportunities to reduce or collect, transport, sort and reprocess downstream mineral waste and assess circular economy solutions as a secondary material. Thus, recognizing the global need to produce longer lifespan products in a smarter way, with less.

## 1.2.6.3. Actions and resources related to resource use and circular economy [E5-2]

Imerys' strategy for its mineral solutions is aligned with the trend of the world economy towards more sustainable solutions for the energy transition, sustainable construction and natural solutions for consumer goods. The circular economy is a core lever of that strategy, positioning Imerys to meet growing expectations on sustainability from its customers.

While the Group has already successfully applied circular principles in various ways (recycled carbonates, longer life cycle kiln furniture, use of paper production waste streams, etc.), accelerating initiatives in this direction is a key objective in the years to come, to deliver on the Group ambition. The Group encourages at entity-level development of local circular initiatives and promotion of sharing best practices.

### The circular economy working group

A circular economy working group was created within Imerys in 2021. The members of the working group are Imerys senior experts from: Sustainability, Mining and Resources Planning, Science & Technology, Strategy, and Operations, representing Corporate and Business Areas of the Group. The ultimate objective is to support the definition of the Group ambition and strategy on resource use and circularity, with a particular focus on the measures and quantitative indicators that would be needed to drive and monitor actions across the business.

## Actions related to circular supply

Opportunities to optimize circular supply are identified continuously during the implementation process of the Imerys continuous improvement program, innovation program, product management and through other ongoing initiatives, including the Group SD Challenge. The Group is constantly seeking to develop ways to create a more sustainable, circular value chain and still produce high-performance end-products for customers

The upstream nature of the Group's business limits opportunities to substitute material inflows for secondary (recycled) and renewable resources; however avenues do exist to re-use:

- Internal waste i.e. re-processing and upgrading Imerys by-products or historic by-products (pre-consumer), and
- Post-industrial/Consumer waste i.e. recovering Imerys minerals for processing, working with other industrial players to collect by-products, working with post-consumer waste.

**01**

### Case study

The Imerys ReMined TM products

ReMined is Imerys 100% pre-consumer recycled calcium carbonate product, produced from re-processing and upgrading by-products from calcitic white marble beneficiation. It is a100% third party certified as pre-consumer recycled material and eligible for various green building credits in the United States (e.g. LEED® Program, National Green Building Standard, NSF/ANSI 140)

Imerys' investments in or modifications to its plants and facilities can mean significant improvements in recoveries can be achieved when modern processing technologies are introduced. These sometimes allow the re-use of historically discarded waste. Some examples include: reprocessing of old kaolin lagoons, applying dust and waste clay recovery management techniques, or improved mica recovery through the beneficiation process.

Techniques for recycling and recovering mineral waste can be divided into three areas:

- Working with other industrial players to collect by-products
- Working with post-consumer waste
- Reducing waste product at customer sites

In December 2023, Imerys & Seitiss joined forces in a joint venture (Seitiss Imerys Minéraux Circulaires) to provide circular economy solutions that recycle mineral waste from industrial activities. Seitiss is a French start-up providing digital tools to locate unexploited sources of waste and create channels allowing them to be recycled into circular products. Imerys brings its industrial and commercial expertise and know-how along with its international deployment capabilities.

**02**

### Case study

Imerloop F A high solids dispersed slurry based on recycled material from the paper and board industry

Imerloop F is a range of recovered mineral solutions, containing Post Industrial Recycled Minerals (PIRM), with comparable properties and a better $CO_2$ footprint versus virgin minerals. This circular solution has been developed in collaboration with pulp, paper and board industry partners and optimized for filler applications.

## Actions related to resource recovery

Once extracted, the beneficiation of the ore during processing offers further opportunities to maximize recovery thus minimizing virgin resources. By working with its downstream customers and having a detailed understanding of how Imerys products are used in their businesses, opportunities to minimize the use of virgin resources upstream can emerge.

### 03 Case study

A New Sustainable Raw Material For Animal Feed Grade

An entry in the 2024 Sustainable Development Competition from Milos Performance Minerals operations in Greece. The entity developed and launched a new tailored product for the animal feed market that had comparable properties to previous products, significantly improved $CO_2$ footprint and significantly improved overall mineral recoveries and thus minimized the use of virgin resources.

## Actions related to product life extension

Imerys' ambition is to proactively steer the overall product and project portfolios towards improved sustainability performance and sustainable solutions. The vehicle it uses to action this ambition is the SustainAgility Solutions Assessment (SSA) - a robust methodology to measure Imerys' portfolio against sustainability criteria and give customers a clear indication of their suitability credentials.

SSA evaluations of the current portfolio allow the Group to identify enablers of the downstream circular economy as there are specific questions dedicated to these topics within the assessment. SSA is also used to screen innovation portfolios to prioritize projects with positive impact on circular economy (and potentially reject / rework projects with negative impact on circularity).

*For more information about SSA, refer to [ESRS S4] of the present chapter.*

By investing in innovation Imerys is creating a more technology-enabled, science-based business, and rethinking its position in the value chain and the role it can play in more sustainable solutions. Sustainability is a catalyst for fundamental change in the industry and the key lever for innovation at Imerys. Imerys is committed to using its minerals and materials expertise to develop more sustainable and environmentally friendly processes that require: less energy, fewer virgin resources and create fewer emissions to meet the future needs of its customers and the planet.

Enabling recycling or the use of renewable material (or making them more competitive or efficient) is concentrated on:

- Providing products for compatibilization
- Enabling simpler downstream recycling
- Extending product life along the full value chain

With increasing global environmental legislation, the planet needs better ways to recycle plastic. The current challenge for recycled plastics is to ensure that the mechanical properties of these more eco-friendly materials—which tend to deteriorate during the recycling process—are maintained or even enhanced to enable them to meet ever more stringent specifications and remain cost-effective. Imerys minerals can enhance the properties of recycled plastics whilst allowing reduction in costs.

### 04 Case study

A new sustainable product range to enhance recycled plastic properties

- Steagreen® is an engineered talc designed specifically to restore mechanical properties to recycled plastics, enabling their use in more highly demanding applications.
- Micas (including Suzorite® range) are ideal for reinforcing recycled nylons, where they improve stiffness and shrinkage.
- In recycled polyamide, Imerys' talcs, wollastonites and micas make excellent cost-effective alternatives to glass fiber, restoring mechanical properties, improving heat resistance and delivering recycled plastics that can be used for more demanding engineering applications.

### 1.2.6.4. Targets related to resource use and circular economy [E5-3]

A key part of understanding how wastes from mines or quarries have value in new industries and improving re-classification of waste materials is quantifying and qualifying what current and historic wastes are available.

Imerys is currently developing a Group-wide baseline of the available waste mineral inventory. Waste mineral inventory refers to all mineral waste areas and long-term stockpiles of already excavated or processed material.

The baseline metric will include:

a) spatial coordinates of active mineral waste stockpiles
b) preliminary mineral characterization details

This metric will track progress to increase the Group's ability to reduce and reuse mineral wastes, supporting a long term goal of increasing resources recovery and circular supply opportunities.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Improve mineral resources efficiency by ensuring priority sites (by mineral waste volume) comply with new mineral waste reporting requirements | 2022<br>0% | 60% | 2025<br>80% |

In 2024, Imerys implemented a strategic initiative to centralize data on mining waste generation, focusing on the 15 major sites that contribute significantly to the Group waste footprint. This comprehensive centralization effort encompasses critical information such as volume, tonnage, composition, and mineralogy of waste dumps. By consolidating this data, Imerys aims to enhance its understanding of its environmental impact and improve its waste management practices. Looking ahead, the Group plans to leverage this centralized information to assess the Circular Economy potential of mining waste. This assessment will be conducted in alignment with the directives set forth by the dedicated circular economy working group described in ESRS [E5-2], ensuring that the approach to waste management advances Imerys commitment to sustainable resource utilization and environmental stewardship.

In addition to the target mentioned above, Imerys committed in 2023 to achieved by the end of 2027 a specific target related to the management of its tailings storage facilities (TSF). Although the TSF the Group operates are few and inherently low risk due to their locations, size and type of construction, Imerys has adopted the Global Industry Standard on Tailings Management (GISTM). This global standard provides a framework for safe tailings management. Embedded within the 6 key topics of the Standard are 15 Principles and 77 auditable requirements. All of Groups tailings facilities at entity level are included on the Global Tailings Portal, a publicly accessible and searchable database with detailed information on global tailings dams.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Comply with applicable GISTM requirements across all its tailing disposal facilities | 2022<br>0% | 60% | 2027<br>100% |

## 1.2.6.5. Material inflows and outflows [E5-4 & E5-5]

Imerys' resources use and circular economy policies, actions, targets and metrics relate to the following identified material inflows and outflows (waste, products and materials).

### Mineral inflows

One of the characteristics of the Imerys Group is its unique access to a wide range of mineral reserves and resources as sources of the majority of raw materials to the Group's industrial plants. The prevalence of these raw materials are industrial minerals; geological materials, which are mined or quarried for their commercial value. They are used in their natural state or after beneficiation either as raw materials or as additives in a wide range of applications.

The industrial minerals used by the Group include: Ball clays, Bentonite, Calcium Carbonates, Diatomite, Feldspars, Kaolin, Perlite, Refractory minerals, Talc and Wollastonite. The Group also sources and processes certain raw materials from external suppliers to create its specialty products. These materials include bauxite, alumina and zirconia, which are processed to produce synthetic corundums. Tabular alumina is used in refractory applications.

A relatively small sector, using hydrocarbon feedstock for non-energy purposes, is the Group's Graphite & Carbon specialty business producing synthetic graphite, carbon black and other graphite-based products.

Some material inflows and outflows used by the Group are classified as Critical Raw Materials (including Bauxite, Feldspar, Silicon Metal and Graphite) or Strategic Raw Materials (including Silicon Metal, Graphite, Bauxite) according to Annex 1 - Regulation EU 2024/1252 (11th April 2024). It should be noted Imerys is currently developing Lithium projects and Lithium is classed as a both Critical and Strategic Raw Material under the above list. No Heavy or Light Rare Earths are used as material inflows.

Imerys extractive operations can currently be classified under the quarrying economic activity sub sector with the pertinent Nomenclature of Economic Activities (NACE) Rev. 2 codes:

- B.08.11 Quarrying of ornamental and building stone, limestone, gypsum, chalk and slate
- B.08.12 Operation of gravel and sand pits; mining of clays and kaolin
- B.08.99 Other mining and quarrying n.e.c.
- B.09.90 Support activities for other mining and quarrying

### Mineral outflows

#### Imerys portfolio

Imerys' value-added solutions are designed to meet the specific, technical requirements of its customers and can be split into three categories:

- Functional additives: an integral part of the formulation of customers' products, but account for only a minor share of the finished product manufacturing cost (e.g. talc improves the rigidity of polymers used in the automotive industry; calcium carbonate makes plastic films breathable for use in baby diapers, or calcium aluminates used in self-levelling, quick-drying cement floor screeds).
- Mineral components: critical constituents in the formulation of customers' products (e.g. mineral solutions for ceramics, or fused alumina in industrial abrasives).
- Process enablers: essential in customers' manufacturing processes, but are not found in the end product (e.g. diatomaceous earth used to filter liquids or to extract proteins from blood plasma by fractionation).

## Mineral wastes

An overview of material resource use flows at Group level in 2024 is as follows:

The Group's mining operations remove overburden and selectively mine minerals that are valuable from other waste rock (Overburden and Internal Waste). Overburden and Internal Waste are generally not processed and merely extracted from the mine or quarry to gain access to the ore and are subsequently used as backfilling or reprofiling materials in post-mining remediation work.

Mineral processing methods are primarily mechanical and physical, as such, the portion of the mined minerals that is discarded is generally inert and subsequently returned to the mine or quarry either dry or mixed with water (tailings) for eventual incorporation in the final remediated landform.

The Group's mineral waste streams can be classed within the following European Waste Catalog codes.

- 01 01 - wastes from mineral extraction
- 01 01 02 - wastes from mineral non-metalliferous excavation
- 01 04 - wastes from physical and chemical processing of non-metalliferous minerals
- 01 04 08 - waste gravel and crushed rocks other than those mentioned in 01 04 07
- 01 04 09 - waste sand and clays
- 01 04 10 - dusty and powdery wastes other than those mentioned in 01 04 07
- 01 04 12 - tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11.

The majority of the mineral waste flows are non-metallic minerals. There are no biomass, metals, plastics, textiles, critical raw materials and rare earths materially present in the mineral waste stream.

Inflow and outflow data is collected at entity specific level. An overview of material resource use flows at Group level is as follows:

| Entity-specific metrics related to mineral outflows | Unit | 2024 | 2023 |
|---|---|---|---|
| Processed mineral raw materials (NEW) | million tonnes (dry) | 19.8 | - |
| *Of which from Imerys mines and quarries (NEW)* | million tonnes (dry) | 18.7 | - |
| Final product derived from Imerys mines and quarries (NEW) | million tonnes (dry) | 9.6 | - |
| Displaced inert mining waste (NEW) | million tonnes (dry) | 35.2 | - |
| Mineral process waste (NEW) | million tonnes (dry) | 9.1 | - |
| *of which tailings (NEW)* | million $m^3$ (wet) | 2.6 | - |

## Industrial wastes

Industrial wastes are the non-mineral wastes generated by Imerys activities, such as solvents, inks, plastic big bags, cardboards and wooden pallets. The small amount of hazardous waste generated by most Imerys operations is principally: chemical additives, residual oils and associated packaging waste.

| Metrics related to industrial waste (material outflows) | Unit | 2024 | 2023 |
|---|---|---|---|
| Total industrial waste | tonnes | 117,937 | 96,232 |
| Non-recycled hazardous industrial waste | tonnes | 2,931 | 1,729 |
| Recycled hazardous industrial waste | tonnes | 1,488 | 1,444 |
| Non-recycled non-hazardous industrial waste | tonnes | 60,877 | 50,228 |
| Recycled non-hazardous industrial waste | tonnes | 52,641 | 42,831 |
| Industrial waste intensity per net revenue | (tonnes/€ million) | 33 | 25 |

The Group's activities generated 118 kt of industrial waste in 2024, 96% of which was non-hazardous. The increase in waste generation compared to 2023 is primarily due to an increase in production. In 2024, the amount of recycled waste represents 46% of the total industrial waste, which is stable compared to 2023.

## 1.3. Empowering our people

### 1.3.1. Imerys' workforce [ESRS S1]

#### 1.3.1.1. Material impacts, risks and opportunities [SBM-3]

##### Identification of groups within the workforce subject to material impacts

All people in Imerys' workforce who could be materially impacted by the Group's activities are included in the scope of this disclosure. This includes:

- Imerys employees, which includes permanent, fixed-term or seasonal, expatriate, apprentice and non-guaranteed hours employees;
- Imerys non-employees as defined by the CSRD, covering self-employed workers and temporary agency workers that Imerys relies on for mining, an activity that is subject to strong fluctuations because of its dependence on weather conditions and the highly volatile demand for mining products.

For health and safety impacts, risks and opportunities, a third category of workers is included:

- "Other workers", including Imerys interns and other contractors not included within the categories cited previously such as subcontractors and vendors who provide specialized services or products. The Group also acknowledges the presence of other individuals who may be on-site periodically, including visitors and hauliers. These individuals, while not permanent employees, are considered part of the extended workforce for the duration of their presence at Imerys facilities.

Due to the inherent nature of industrial mining and quarrying activities, it is appropriate to differentiate between:

- Laboratory and office workers from headquarters
- Operational workers, which are employees and non-employees working in mines, quarries and plants, who are therefore more exposed to potential risk regarding health and safety impacts.

Note: the Group's reporting scope excludes activities and services that are externalized or purchased from third parties and performed at their own facilities, including those of suppliers, manufacturers, or partners. This exclusion encompasses, for example, the manufacture of equipment at a supplier's site.

##### Material impact, risks and opportunities

The following table summarizes the material negative and positive impacts identified as a result of the double materiality assessment presented in disclosure requirement [ESRS 2 IRO-1] of the present chapter. The conclusion of the assessment highlighted a common pattern of the severity and the likelihood of the identified impacts;

- The inherent risks linked to the Group industrial activity, impacts related to health and safety are the most material topics for the workforce;
- The impacts related to diversity, equity, inclusion, and working conditions are either actual impacts or potential impacts that may happen within the organization, but with a limited severity of injuries or psychological harm;
- The potential impact of child and forced labors, which would be severe as it may result in life changing injuries and/or in significant psychological harm, are very unlikely to occur.

The processes for engaging with the workforce about these impacts and the mitigation measures Imerys implements are respectively presented in disclosure requirements [ESRS S1-2] and [ESRS S1-3].

| ESRS S1. Own Workforce | | | |
|---|---|---|---|
| **Materiality** | **Location within the value chain** | **Description of the IRO** | **Time horizon** |
| *Health & safety* | | | |
| **Imerys commitment:** The Group is committed to developing a proactive Health & Safety culture wherever it operates. The Group is likewise committed to a continuous improvement cycle of Health & Safety performance; setting objectives, reporting, auditing and reviewing. The personal involvement of each individual within Imerys is considered essential to achieving an incident-free workplace. The Group has developed requirements for each site to perform health baseline assessment and group standards to provide adequate protection for occupational health exposures.<br>The Health & Safety framework is fundamental to the Group's success and contributes to SDG 3 to ensure healthy lives and promote well-being for all at all ages and concretely contributes to SDG 8 to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all. | | | |
| ⊖ Potential negative impact<br>Punctual | ● Own operations<br>(all activities) | Occupational illness: Group activities may have negative impacts on employees in the event that it does not provide adequate protection to employees to prevent occupational diseases<br>*Main group(s) of own workforce:*<br>Operational workers (employees and non-employees) | ●●● Long |
| ⊖ Actual negative impact<br>Punctual | ● Own operations<br>(all activities) | Occupational injury: Group activities have negative impacts on employees in the event that it does not provide adequate protection to employees to prevent occupational injuries, life changing accidents or fatalities<br>*Main group(s) of own workforce:*<br>Operational workers (employees and non-employees) | ●○○ Short |
| *Diversity, equity and inclusion* | | | |
| **Imerys commitment:** Imerys seeks to create an environment that promotes employees' development as a key element of growth and transformation. It strives to promote mutual respect in all practices and dealings with its employees and non-employees.<br>The Group commits to ensure the inclusion of people with disabilities, enable workers to achieve a satisfactory state of equilibrium between work and private life, prevent violence and harassment in the workplace and from working excessive hours.<br>The Group contributes to SDG 4 to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; to SDG 5 to achieve gender equality and empower all women and girls; and to SDG 8 to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all. | | | |
| ⊕ Actual positive impact<br>Systemic | ● Own operations<br>(all activities) | Diversity, equity and inclusion awareness: Group activities have positive impacts on local employees and local communities as through proactive diversity, equity and inclusion programs inclusion awareness for minority and/or vulnerable populations may increase amongst employees as well as local communities.<br>Main group(s) of own workforce:<br>All employees and non-employees surrounding Group operations | ●○○ Short |
| ⊖ Actual negative impact<br>Systemic | ● Own operations<br>(all activities) | Non-inclusion of persons with disabilities: Group activities have negative impacts on employees in the event that it discriminates against people with disabilities and/or fails to ensure adequate accessibility and adaptation measures.<br>Main group(s) of own workforce:<br>All employees and non-employees with disabilities | ●○○ Short |
| ⊖ Potential negative impact<br>Punctual | ● Own operations<br>(all activities) | Violence and harassment: Group activities may have negative impacts on employees in the event that it neither prevents, nor sanctions violence and harassment in the workplace.<br>Main group(s) of own workforce:<br>All employees and non-employees belonging to a minority | ●●○ Medium |
| ⊖ Actual negative impact<br>Systemic | ● Own operations<br>(all activities) | Inadequate working time: Group activities have negative impacts on employees in the event it denies limitations on overtime, requires long shifts, night and weekend work and does not provide adequate lead time for shift scheduling.<br>Main group(s) of own workforce:<br>Operational workers (employees and non-employees) | ●○○ Short |

**ESRS S1. Own Workforce**

| | | | |
|---|---|---|---|
| ⊖ Actual negative impact<br>Systemic | Own operations<br>(all activities) | Inadequate work-life balance: Group activities have negative impacts on employees in the event that working conditions prevent employees from balancing their work and private lives.<br>Main group(s) of own workforce:<br>Operational workers (employees and non-employees) | Medium |

*TRAINING & SKILLS DEVELOPMENT*

**Imerys commitment:**

Imerys is committed to provide continuous learning to improve the skills and competencies of all employees globally. Such a development opportunity is a continuing process for every employee at every level of the organization, and formal training is one key element amongst several development opportunities.

Imerys ensures that training is made available on a fair basis and allocated in a transparent manner, based on business requirements and personal needs. All training is implemented and performed in accordance with the respective national laws, in particular with respect to labour law, anti-discrimination laws and data protection requirements, and in accordance with its internal Learning policy. This contributes to the development of human capital at Imerys and thus work towards SDG 4 to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

| | | | |
|---|---|---|---|
| ⊕ Actual positive impact<br>Systemic | Own operations<br>(all activities) | Human capital development and local economic benefits: Group activities have positive impacts on local employees as through training and skills development employees gain new competencies, professional experiences, career opportunities and increased lifetime earning potential as a result of their employment with Imerys. Indirectly this contributes to local, regional and/or national economies and can likewise support the development of infrastructure in remote areas given that most Imerys sites are located away from main employment areas where employment options are relatively limited.<br>Main group(s) of own workforce:<br>All employees and non-employees surrounding Group operations | Short |

*LABOR PRACTICES AND WORKING CONDITIONS*

**Imerys commitment:**

The Group is committed to respecting human rights, avoiding complicity in human rights abuses and providing access to remedy, in line with the UN Guiding Principles on Business and Human Rights. Imerys endeavors to have a positive impact on employees' welfare through its employment practices, which likewise have both indirect and induced positive impacts on surrounding communities and thereby contribute to SDG 8 to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

| | | | |
|---|---|---|---|
| ⊖ Potential negative impact<br>Systemic | Own operations<br>(all activities) | Child Labor: Group activities may have negative impacts on efforts against child labor in the event that minimum age requirements for employees are not properly enforced.<br>Main group(s) of own workforce:<br>Operational workers (employees and non-employees), located in countries at high risk of child labor as per ILO statistics, representing 16% of the total employee headcount (mainly Brazil and Mexico) | Long |
| ⊖ Potential negative impact<br>Systemic | Own operations<br>(all activities) | Forced labor: Group activities may have negative impacts on efforts against modern slavery in the event that it inadvertently allows any form of forced labor, slavery, human trafficking, prison labor, or retention of passports across its operations.<br>Main group(s) of own workforce:<br>Operational workers (employees and non-employees), located in countries at high risk of forced labor as per ILO statistics, representing 38% of the total employee headcount (mainly Brazil, China, Greece and Mexico) | Long |

Imerys' commitment to reducing negative impacts, enhancing positive impacts and managing risks and opportunities related to its own workforce is captured under one of the SustainAgility program's three axes, "Empowering our people". These topics are fully integrated within Imerys' values, which are detailed in Chapter 1, section 1.1.1 of the Universal Registration Document.

Imerys' commitment to reducing negative impacts, enhancing positive impacts and managing risks and opportunities related to its own workforce is captured under one of the SustainAgility program's three axes, "Empowering our people". These topics are fully integrated within Imerys' values, which are detailed in the disclosure requirement [ESRS 2 SBM-1] of the present chapter.

**Empowering our people**

| Health and Safety | Diversity, Equity and Inclusion | Training and skills development | Labor practices and working conditions |
| --- | --- | --- | --- |

## 1.3.1.2. Processes for engaging with Imerys' workforce and its representatives [S1-2]

The Group strives to build constructive, open dialogue with its employees and their representatives in accordance with local regulations and implements best practices in matters of workforce management. Establishing and maintaining this open dialogue is a means to contribute to SDG 8 to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all. The interests and views of Imerys employees and representatives also provide rich insights to guide the development of the Group sustainability roadmap. The materiality assessment, for instance, was conducted in collaboration with Imerys employees through several means of consultations, including through a survey to all employees (refer to "Your Voice" hereafter) and face-to-face meetings with employees and employee representatives.

Engagement with Imerys' workforce and its representatives occur through various channels and occasions, among which:

- collective bargaining frameworks and agreements and social dialogue forums;
- the employee engagement survey "Your voice";
- internal communication platforms and social media and community tools.

### Engaging with workers' representatives through collective bargaining and social dialogue

Imerys recognizes the right to freedom of association and the right to collective bargaining, which is clearly set out within the Group Code of Business Conduct & Ethics and detailed within the related HR policies and procedures. Dialogue between Imerys and its workers' representatives occurs regularly during the year according to the local legislation in place.

A majority of Group employees 67% are covered by Collective Bargaining Agreements (CBAs). These CBAs commonly include subjects such as health and safety, work organization and working hours, training, compensation and benefits, and equal opportunities.

In Europe, the European Works Council (EWC) covers Group employees in 18 countries (see section below). The EWC is regularly informed and consulted on Group strategic decisions, including major projects related to changes in the Group's activities when they occur. Discussions with the EWC include updates with regards to business performance, safety, environment, employee engagement, divestiture and acquisition, diversity, equity and inclusion amongst other topics.

The term of office of elected representatives of the EWC is four years and the EWC is composed of:

- the employee delegation, which consists of 15 members, representing different nationalities; and
- five EWC officers, acting as a liaison between representatives and Imerys management.

The most recent EWC agreement was signed on May 24, 2022, covering 2022-2026. Amongst various provisions this agreement provides a specific training path to all members beyond the legal requirements, covering Group activities, geographical presence, market and customer applications, and key figures. Furthermore, in order to better apprehend their missions and responsibilities as EWC Representatives, a specific tailor-made training on financial matters was also conducted covering the main financial components and mechanics of a Profit & Loss, balance sheet and free operating cash flow statements.

In 2024, one plenary session was held and the EWC's five officers met three additional times during the year. One extraordinary session was organized with the EWC officers for the divestiture of assets serving the paper market. The CSRD implementation process and the sustainability performance, roadmap and priorities for 2025 were presented and discussed with the EWC during the 2024 plenary session. More particularly, EWC representatives were consulted as key internal stakeholders during the double materiality assessment process. Please refer to disclosure requirement [ESRS 2 IRO-1] for more information.

In the event of restructuring, the Group engages in constructive dialogue and puts in place a range of services for employees, ranging from internal mobility, training, outplacement services, amongst other offerings as appropriate to the specific situation.

#### Engaging directly with employees through the employee engagement survey "Your voice"

Imerys evaluates its employees' engagement periodically through the "Your voice" survey. The questionnaire, available in 26 languages, is shared with all employees across all Imerys countries and businesses and conducted confidentially and anonymously. The Chief Human Resources Officer is then responsible for using these rich insights to guide the development of improvement action plans. The last edition conducted in 2021, for which the response rate reached 88% (over 13,000 employees) showed high levels of engagement and enablement across the Group (68% and 73% respectively), driven by a strong loyalty to Imerys (71%), which is 10 points above the industrial norm. As a result of the findings of the last survey, the Group launched a major pluriannual project (2022-2025) around the Group Purpose, Vision and Values, which are presented in greater detail in Chapter 1, section 1.1.1 of the Universal Registration Document.

#### Engaging directly with employees through internal social media and communities

Internal communication campaigns aim to provide all employees with information that can help them understand the Group's strategy and activities, build their sense of belonging and help to strengthen the Group identity. Information is actively shared across the Group via various means, including through a collaborative digital platform "OneImerys", which supports daily communication and collaboration. This platform hosts essential information, documentation and policies, but also social feeds and workspaces, tools and business applications. The intranet is optimized to enable employees to use tools and resources in an agile way – including smartphone access to Group level applications. The intranet facilitates the sharing of projects, initiatives and successes throughout the Group. It is likewise a platform to share information and support discussion on specific topics within specialized communities.

To "communicate for success" is a central part of Imerys' Leadership Competencies, and as such the Group privileges regular managerial face-to-face dialogue to share key information within teams. To complement this form of dialogue, the Group launches various video messages from the Group CEO and senior leaders. At least bi-annual, these videos are intended for all employees and cover the main achievement and challenges. Quarterly calls run by the CEO and the members of the Executive committee are held with the top leaders of the Group to provide information about strategic matters in progress or in preparation. These sessions include a question and answer section, which support the cascade of information within the organization in a complete and consistent fashion.

### 1.3.1.3. Processes for impact remediation and channels for workers to raise concerns [S1-3]

Local managers and HR officers are the primary contacts for Imerys workers. However, they are free to report any negative impact through the channels described above or by using the alert system described in disclosure requirement [ESRS G1-1] section 1.4.1.3, paragraph "Alert system and protection of whistleblowers" of the present chapter The remediation process is then the same as for any other matter raised through this channel; a dedicated team is set up to investigate the alert, and mitigation measures are drawn up based on its findings.

## 1.3.1.4. Health and Safety

### Policies related to health & safety [S1-1]

#### Safety Management System

For Imerys, managing Health and Safety (H & S) of the Group's employees and contractors is a core value. The Group has a dedicated Health and Safety Committee, chaired by the CEO and composed of each of the Business Area Senior Vice presidents and functional Senior Managers of the Group. The Health and Safety Committee meets at least three times a year and monitors the Group's progress on all health and safety policies, objectives and programs. The main health and safety indicators are reviewed on a monthly basis at every Executive Committee meeting and during quarterly business reviews.

Based on a set of core safety values established at Imerys and the 4 pillars of the Safer Together umbrella detailed here after, the "Imerys Safety System" (ISS), the H&S management system, is developed in compliance with recognized industry standards (e.g. ISO 45001), to prevent occupational illness & occupational injury and to create a positive and proactive Safety Culture. It encompasses the core elements of international standards for H&S management systems, that are periodically reviewed and revised as part of a management system. The ISS is defined in the Umbrella H&S Policy and through the Safety Culture Maturity Matrix. Imerys requires each operation across the Group to have an effective Safety Management System (SMS) in place with site managers ensuring that Imerys Group policies, guidelines and system are transformed into procedures aligned with local legal requirements. Senior leaders verify the effective implementation of the Imerys Safety System (ISS) within the sites and operations under their perimeter of responsibility.

The Imerys Safety System deployed through Health and Safety policies, guidelines, prevention programs and initiatives is structured around a common umbrella called "Safer Together". It provides a visual identity and brings together the different elements of the ISS to create a positive and proactive Safety Culture: Being Positive About Safety; Placing Health & Safety Above All; Looking Out For Each Other; and Taking Responsibility.

Each pillar covers specific components of the ISS. "Being positive about Safety" includes initiatives such as recognition programs, prevention campaigns, sharing good practices, and Imerys Connect Day. "Placing Health and Safety above all" includes the elements of compliance, definition and application of Group policies (e.g. risk assessment, policies focused on managing critical risks, EHS audits and mine safety audits, safety alerts sharing and accident analysis, inspections and regulatory training. "Taking Responsibility" encompasses initiatives focused on individual commitment (e.g. Take 5, H&S awareness training, improvement proposals and bottom-up reporting). "Looking out for Each Other" is about respecting and caring about each other, through coaching and feedback (Visible Felt Leadership (VFL), Behavioral Based Safety programs, Safety Summits) and safety culture development programs with standards and assessments.

The Operational Control of the ISS is structured around a set of Health and Safety policies and guidelines, detailed hereafter (see section 1.3.1.3), and Group internal audit program to control implementation across all sites.

### Health and safety policies

The Group internal policies, developed in accordance with recognized industry standards, are in place to prevent occupational illness and occupational injury (refer to disclosure requirement [ESRS S1-1] above). These policies are made available to each site, which ensures that it is transformed in local procedures aligned with local legal requirements and made available in comprehensive languages for all the workers.

The Group Internal H&S policies includes the following documents:

Imerys Health and Safety Charter: Signed by the CEO, it emphasizes the Group H&S vision, the importance of the role played by each individual to create a health and safety culture, and the expectations around continuous improvement, training and zero tolerance if the Group' policies and procedures are breached.

Environmental, Health & Safety General Policy: establishes the overall framework and organization for compliance and continuous improvement in EHS at Imerys, while clarifying employee roles and responsibilities.

EHS Audit Policy and Safety Culture Improvement Team (SCIT) Policy: ensures the consistent application of standard practices for effective and efficient EHS SCIT events and EHS audits, and also prescribes periodic assessment of sites.

EHS audits evaluate the compliance of the site in the correct and effective applications of Group policies and guidelines as well as local regulations regarding health and safety.

SCIT events evaluate the maturity and continuous improvement of the site safety culture, based on the Safety Culture Maturity Matrix.

Thematic policies: the Group also has 40+ additional policies for the management of specific health and safety risks covering a broad spectrum of situations, like electrical safety, working at height, forklift safety, and risk assessment for example.

Group policies apply to all employees and non-employees (e.g. self-employed workers, temporary agency workers), and other workers on site (e.g. contractors, interns...), in all Group activities. Senior Vice-Presidents, Industrial Vice-Presidents, Hub Directors and Site Managers are responsible for monitoring their implementation at all levels of the organization.

## Taking actions on material impacts related to health & safety on own workforce [S1-4]

### Safety Culture Maturity matrix (SCMM)

To support the development of an effective safety culture, the Group has developed a Safety Culture Maturity matrix (SCMM) based on four key elements: leadership and accountability, compliance and continuous improvement, Behavior-Based Safety (BBS) and an integrated approach. The SCMM matrix, built considering internationally recognized standards for safety management and aligned with the fundamentals of the Imerys safety policies and procedures, helps operations conduct gap analyses and drive their improvement plans in partnership with industrial teams and safety professionals. The Group EHS Audit Team conducts annually comprehensive and independent onsite audits (SCIT events) to assess the Safety Culture Maturity. These events allow calibration of the site self-assessment and perform perception surveys to identify perception gaps between management and workforce and formulate recommendations to improve the Site H&S culture.

### Risk Assessment

Risk management, defined by a dedicated policy, is a cornerstone of the ISS. All sites and operations are required to develop overall workplace/task-specific risk assessments. This is a systematic examination of all aspects of the work undertaken to consider what could cause injury or harm, whether the hazards can be eliminated, and if not, what preventive or protective measures are, or should be in place to control the risks. The overall workplace/task-specific risk assessment will normally be conducted by a team including operators, maintenance workers, safety professionals, supervisors, managers and if necessary, external experts. The worker representatives of the site, when applicable, are also involved in the process, as well as occupational health services. Sites document the results of the workplace or task-specific risk assessment and train employees accordingly. The overall workplace and task-specific risk assessments need to be reviewed and revised, as necessary, to take into account changes to the work activity, or if the root cause analysis conducted following an accident or injury identifies a previously unidentified risk. In most cases, risk assessments will be reviewed at regular intervals, depending on the nature of the risks and the degree of change likely in the work activity and/or based on local regulation.

The conclusions of the task-risk assessment identify if the risk is adequately controlled and if not, options for reduction based on the hierarchy of controls (elimination, substitution, engineering controls, administrative controls and personal protective equipment).

### Serious 7

The Group safety efforts focus in particular on the “Serious 7” to address highest risk areas (lock out, tag out, try out, electrical safety, machine guarding and conveyor safety, mobile equipment, working at heights, ground control and forklift safety) which have been identified as key contributors in preventing Imerys’ severe injuries and fatalities. This approach is supported by:

- detailed policies and guidelines to control these risks
- regular audits and inspections to identify non-compliance and gaps
- associated prevention and corrective actions plan with investment to reach full compliance
- training and communication campaigns to raise awareness
- sharing good practices and safety alerts

### Accident, Incident and events reporting, investigation and monitoring

A data management system is in place to enter and record Health and Safety events:

- Accidents, injuries (fatality, lost-time and non-lost-time accidents, first aid) with associated lost and/or restricted duty days
- Occupational illnesses (fatality, lost-time and non-lost time illness) with associated lost and/or restricted duty days
- Incidents (property damages, near-misses)
- Bottom-up events (at risk conditions, at risk behaviour, positive observations)
- Working hours

These records apply to all employees and non-employees (e.g. self-employed workers, temporary agency workers), and other workers on site (e.g. contractors, interns…). This allows tracking lagging indicators, like non-lost time and lost time occupational illnesses and accident frequency rates in accordance with the Group injury and ill health reporting policy. In case an incident occurs, incident investigations are conducted and corrective actions are implemented at site level with follow-up by Business Area teams. Safety alerts are issued whenever a fatality, a life-changing injury or a Significant Potential Incident (SPI) occurs to share root causes and lessons learned within the Group. An SPI is any reported incident that has the potential to result in a fatality or a life-changing injury regardless of the actual severity. Where appropriate, corrective actions identified through an incident investigation are directly integrated into the next update of Group safety policies to reduce the risk of recurrence.

On top of reporting and recording safety and health events, the database is also used to perform and record prevention activities:

- Inspections: to assess applications of the Group' standards on the field
- Worker interactions - Safety dialogue (VFL & BBS): to promote safe behaviour and redirect unsafe acts, key driver for a proactive safety culture

These records are used to track leading indicators associated with those activities (bottom-up reporting, Inspection and VFL rates).

Dedicated modules are also available database to cover occupational health and industrial hygiene topics:

- Health Risk Assessment
- Sampling and Occupational Exposure monitoring. Imerys also tracks Occupational Exposure Limits (OEL) data on a quarterly basis to ensure reliable reference values and traceability
- Corrective actions for health and industrial hygiene

(refer to disclosure requirement [ESRS S1-4], paragraph "Occupational health action plan" below)

### Training, awareness and communication

Training and awareness of the Group health and safety management system are achieved through various communication and training activities, often developed in local languages. Local initiatives also arise at regional, hub or site level and include job-related safety training and regular safety toolbox meetings. These training courses can be followed in several formats depending on the target audience.

| Training activities | Targeted audience | Description |
|---|---|---|
| Safety Learning Path | Newcomers | The modules of the Safety Learning path are intended to introduce the key principles and tools of the Imerys Safety journey (ISS, Take 5, Serious 7, Safety Dialogue). Different paths are available for Operational and non-operational employees |
| Safety Summits | Operational managers and senior leaders | The Group Safety Summits aim at strengthening Visible Felt Leadership (VFL) within the most senior leadership |
| Imerys Safety Universities | Operational managers and senior leaders | The Imerys Safety University relies on a tailored approach to coach site managers and operational managers (production, maintenance, mining, logistic, …) on mastering Imerys tools and how to cascade VFL within their supervisory teams |
| EHS auditor training | EHS and mine safety auditors | This training conducted annually aims at aligning and calibrating the Group auditors team members (update on the Imerys requirements, auditing process and techniques, …).<br>This training is required for all existing auditors and new members joining the Group auditor team. |
| Digital courses on the Imerys Learning Hub<br>IMERYS Learning Hub | All Imerys employees | The Group provides its employees with an e-learning platform offering a broad choice of on-demand addition contents:<br>– H&S basics (ISS, Take 5, Serious 7, Safety Dialogue)<br>– Specific Health & Safety Learning modules (Risk Assessment, Root Cause Analysis, Managing Hazardous Substances, Process Safety, Safety Culture, BBS, Management of Change, Truck Tip over, …)<br>– Rebroadcast of 200+ internal health & safety webinars and virtual classes focusing on a specific safety theme. |

Other Group wide initiatives and toolboxes have been undertaken to support the continuous improvement of occupational safety and health management including for example:

| Awareness initiatives and toolboxes | Targeted audience | Description |
|---|---|---|
| Imerys Connect Day | All Imerys employees | Imerys Connect Day is an annual event organized by the Group and typically brings together Imerys employees from around the world to foster connection, collaboration, and engagement within the Group. The Imerys Connect Day includes various activities such as:<br>– Presentations on Imerys EHS performance and recognition of employee achievements<br>– Workshops and discussions on key EHS topics<br>– Team-building exercises<br>– Networking opportunities for staff from different regions and departments<br>The event aims to strengthen the Group culture and promote a sense of unity across the global organization, with a focus on health, safety and environmental topics. |
| Take 5 | All Imerys employees | The Take 5 is a brief five-step process that each employee should undertake before starting work and then throughout the day whenever work or working conditions change. |
| Industrial Hygiene user guide | Operational managers and senior leaders<br>EHS teams | A user guide was developed to describe the frequency and roles and responsibilities for site and EHS teams with regards to Occupational Health Assessments (OHA) relating to physical, chemical, biological agents and welfare. |
| Mental health guide | Managers and senior leaders | A guide was developed for managers to help them support the mental health and well-being of employees. Localized actions and training of mental health first-aiders, as well as stress management have been developed across some of Imerys' geographic locations. |

## Occupational safety action plan

### Onsite EHS compliance audits and Safety Culture Maturity Assessments (SCIT)

| 44 Imerys sites selected | **Recurrent action** |
|---|---|

*Expected outcome*

**44** audits and SCIT planned in 2024

*Results at end 2024*

**42** audits and SCIT completed (95% of the plan)

| One third of industrial sites | **2028** |
|---|---|

*Expected outcome*

- **Develop and implement simple audit checklists for Serious 7 policies compliance**

### Accident & Incident tracking and investigations

| All Imerys sites | **Recurrent action** |
|---|---|

*Expected outcome*

- **Identify root causes of accident, take prevention and corrective measures, share learnings for high potential incidents**
- **Improve quality of process safety event reporting in internal systems**

*Results at end 2024:*

**66**

safety alerts related to Significant Potential Incident (SPIs).

### Training and awareness-raising

| All Imerys sites | **Recurrent action** |
|---|---|

*Expected outcome*

Enhance workers' skills and knowledge through cross-site collaboration, sharing lessons learned from incidents, exchanging improvement ideas, and disseminating best practices

*Results at end 2024*

**126,610** total training hours on EHS topics

**10 sessions** of Imerys Safety University (ISU)

**1** Safety Summits

**13** webinars on specific Safety topics

e.g. H&S and CSRD reporting, Root Cause Analysis, Mine Geotechnical Risk Management, Process Safety, Insurance

**1,041**

Serious 7 (S7) training hours

- **Imerys Connect Day on the theme "Enabling tomorrow starts with me"**
- **Good practices and sharing in H&S Community engagements:**

  **267 posts, 214 comments and 2764 Likes**

### Leading activities (bottom up reporting, Inspections and VFL/BBS)

*Expected outcome*

Foster a proactive safety culture by encouraging the reporting of potential hazards, unsafe behaviors, near-miss incidents, and property damage, thereby enhancing preventive measures and risk mitigation strategies.

*Results at end 2024*

**4.08**

Bottom-up rate for 1000 working hours (+13% versus 2023)

- **Promoting the compliance with Imerys standards through the reporting of regular inspections (Serious 7 and others)**

**9.94** Inspection rate for 10,000 working hours

(+15% versus 2023), among which are Serious 7 related 7.59 (+11% versus 2023)

- **Promoting leadership behaviors and Safety Culture through the reporting of interactions / safety dialogue**

**44,176**

VFL and BBS interactions recorded (+3% versus 2023)

### Occupational health action plan

The Group conducted a baseline assessment in 2020 focused on industrial workplace health risk identification, assessment, control, monitoring and review processes for all its sites. On this basis, Imerys developed a comprehensive occupational health action plan, focusing on the following four pillars: risk and general management, policies, systems and training.

As part of this plan, Imerys' operations identified the range of occupational health risk scenarios, assess them and develop control plans proportional to the risk. Appropriate information, instruction and training are provided. Occupational health practices are systematically reviewed to seek improvement, simplification and standardization. Compliance with regulations and the Group's occupational health policies are reviewed regularly through the Group environmental, health and safety (EHS) audit program.

The Group occupational health programs implemented cover a range of health and hygiene aspects, with a particular emphasis placed on the management of airborne contaminants, vibration and noise. Across Group locations, health plans and programs are based on site occupational health risks, which integrate wellness initiatives. Wellness and occupational health campaigns are supported by Human Resources, external occupational health nurses and physicians and internal health and safety personnel as well as communication teams.

#### Systems

All Imerys sites **2024**

*Expected outcome*

- **Improve quality of occupational exposure data monitoring and reporting in Imerys internal systems**

*Results at end 2024*

- **Implementation of new digital dashboard to monitor results and performance**
- **Update of the internal system user guide on industrial hygiene reporting**
- **Automation of occupational exposure limits update based on regulatory requirement changes**

#### Policies

Roll-out of specific policies

All Imerys sites **2024-2030**

*Expected outcome*

Expected deployment:

- **Manual handling**
- **Biological agents**
- **Physical agents**

*Results at end 2024*

- **Internal publication of Vibration policy and ongoing deployment**

#### Training and awareness-raising

Operational managers and senior leaders
EHS team **2024**

*Expected outcome*

- **Improve knowledge around occupational health risks.**

*Results at end 2024*

- **New e-learning training on Managing hazardous substances**

**4**

webinars on specific topics:

- **Health & Safety statistics analysis**
- **Vibration implementation policy**
- **Maintenance, workshops and activities**
- **CSRD reporting**

#### Risk and general management

All Imerys sites **2024-2030**

*Expected outcome*

- **Each site is required to assess its occupational health risks and maturity, maintain it updated and deploy an action plan accordingly.**

*Results at end 2024*

**99%**

of sites assessed the physical, chemical and biological hazards exposure (New sites recently acquired to be covered)

## Targets related to Health & Safety [S1-5]

In line with the Group's Purpose, Vision and Values, health and safety targets are a central to the SustainAgility program.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Improve Group Safety Culture Maturity (1) across all Business Areas | 2025<br>3.0 | 3.2 | 2025<br>3.3 |
| Increase the global occupational health action plan improvement rate | 2025<br>0% | 63% | 2025<br>75% |

### Safety culture

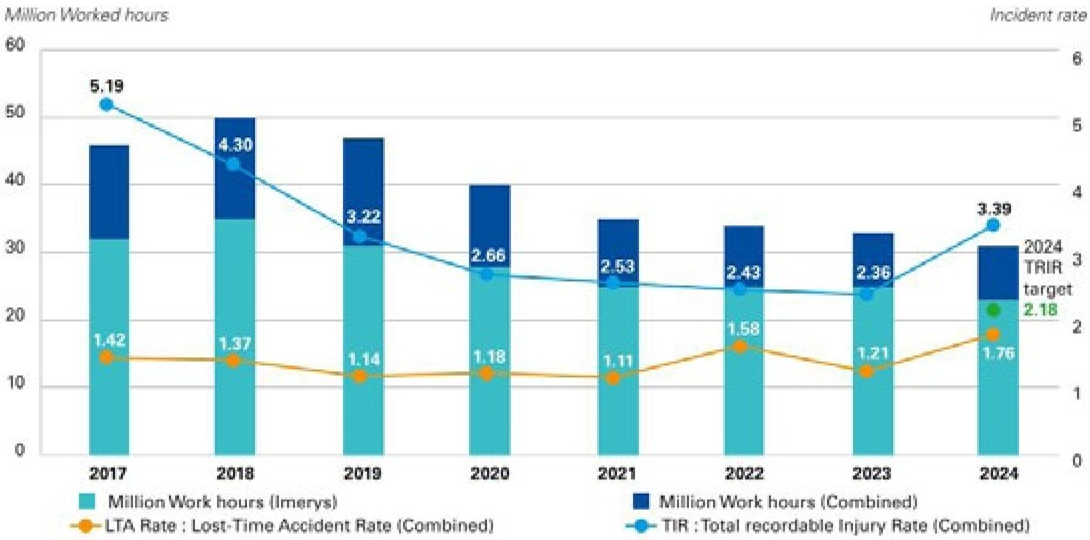
Every year the safety maturity of all Group operations are categorized using the Safety Culture Maturity Matrix. As a result of the comprehensive assessment, sites develop specific site-level safety action plans. At the end of 2022, the assessment showed a Group maturity of 3.0, which corresponds to the "Proactive" level, where the Imerys Safety System is fully implemented, employees are engaged and contribute actively to safety. The Safety target is to improve the Group Safety Culture Maturity to 3.3 by 2025. As of the end of 2024 the consolidated result of the assessment was 3.2, which indicates that the Group is on track towards the 2025 target.

### Occupational health

Starting in 2023, the business areas planned and developed an Occupational Hygiene Improvement Action Plan known as the OHAP, focussed on improving worker health protection measures. Activities were identified through Imerys continuous improvement programs (exposure monitoring, occupational health annual assessment to list two examples). The OHAP was directed by the Group Industrial Hygienist in coordination with Business Area industrial hygiene focal points. The plan includes the most relevant actions that are specific to the respective Business Areas to continue the improvement of their baseline. The objective for 2025 is the completion of at least 75% of the actions for the year. At the end of the year, 94% of the actions planned were implemented, which represents a cumulative performance of 63% since 2022. The objective will again be to achieve a completion rate of at least 75%.

## Metrics related to health and safety [S1-14]

### Group Lost time accident rate




As of December 2024, the combined Lost Time Accident (LTA) rate of the Group (own workforce and other workers on site) was 1.76 and the combined Total Recordable Injury Rate (TRIR) was 3.39 above the 2024 target TRIR, which was set at 2.18.

A comprehensive awareness campaign on life changing injuries was conducted in May 2023 to target Imerys' immediate priority of eliminating fatalities and severe injuries. One life changing injury occurred in the period since the launch of the campaign, in January 2024, and no fatality has been recorded for more than 2 years. This is a significant improvement over the historical records. Despite this, the TRIR, which includes all recordable accidents, was above this year's target. The main causes of these events being related to behaviour, skills and risk management / risk evaluation associated to the following direct causes: slip-trip and fall, being in the line of fire and hit-struck by moving or stationary object. To cope with this increase of injuries, each Business Area has launched a Behaviour-Based Safety Program (BBS), supported by a Group campaign, in order to empower employees to take ownership of their own safety and that of their colleagues because safety is a system inherently based around human actions. To reach zero accidents, the Group needs to continuously develop its safety culture by understanding how individual actions and behaviors can create a safer workplace for everyone. The Group will keep up its unyielding focus on continuously improving safety performance and work towards its goal to achieve an injury-free workplace.

| Topic | Indicator | Unit | 2024 | 2023 |
|---|---|---|---|---|
| Fatalities | **Total number of fatalities** | # | **0** | **0** |
| | Number of fatalities of employees | # | 0 | 0 |
| | Number of fatalities of non-employees | # | 0 | 0 |
| | Number of fatalities of other workers on site | # | 0 | 0 |
| | Number of fatalities as a result of work-related injuries | # | 0 | 0 |
| | Number of fatalities as a result of work-related ill health | # | 0 | 0 |
| Lost-Time Accident rates | Lost-time accident rate of employees and non-employees | - | 1.76 | 1.21 |
| | Lost-time accident rates of employees | - | 1.69 | 1.03 |
| | Lost-time accident rates of non-employees | - | 1.27 | 1.77 |
| | Lost-time accident rates of other workers on site | - | 2.25 | |
| Number of days lost due to injuries and fatalities from work-related accidents | **Total number of lost days due to injuries and fatalities from work-related accidents (own workforce and other workers on site)** | # | **2,897** | **1152** |
| | Number of lost days of employees due to injuries and fatalities from work-related accidents | # | 2,153 | 710 |
| | Number of lost days of non-employees due to injuries and fatalities from work-related accidents | # | 114 | 442 |
| | Number of lost days of other workers on site due to injuries and fatalities from work-related accidents | # | 630 | |
| Number of days lost due to ill heallth and fatalities from work-related to ill health | **Total number of lost days due to ill health and fatalities from work-related to ill health of employees and non-employees** | # | **413** | **170** |
| | Number of lost days of employees due to ill health and fatalities from work-related to ill health | # | 413 | 170 |
| | Number of lost days of non-employees due to ill health and fatalities from work-related to ill health | # | 0 | 0 |
| Number of recordable work-related accidents | **Total number of recordable work-related accidents** | # | **106** | **78** |
| | Number of recordable work-related accidents of employees | # | 76 | 54 |
| | Number of recordable work-related accidents of non-employees | # | 5 | 24 |
| | Number of recordable work-related accidents of other workers on site | # | 25 | |
| Recordable work-related accidents rates | **Rate of recordable work-related accidents of employees and non-employees** | - | **3.39** | **2.35** |
| | Rate of recordable work-related accidents of employees | - | 3.28 | 2.18 |
| | Rate of recordable work-related accidents of non-employees | - | 2.12 | 2.91 |
| | Rate of recordable work-related accidents of other workers on site | - | 4.33 | |
| Case of recordable work-related ill health, subject to legal restrictions on the collection of data | **Total number of cases of recordable work-related ill health, subject to legal restrictions on the collection of data (NEW)** | # | **5** | **4** |
| | Number of cases of recordable work-related ill health of employees subject to legal restrictions on the collection of data (NEW) | # | 5 | 4 |
| | Number of cases of recordable work-related ill health of non-employees subject to legal restrictions on the collection of data (NEW) | # | 0 | 0 |
| Safety Management | **Percentage of employees and non-employees covered by Imerys health and safety management system (SMS) based on legal requirements and (or) recognized standards or guidelines (NEW)** | % | **100%** | **100%** |
| | Percentage of workforce covered by a SMS which have been internally audited (NEW) | % | 19.8% | - |
| | Percentage of workforce covered by a SMS which have been audited/certified by an external party (NEW) | % | 20.7% | - |

### 1.3.1.5. Diversity, equity and inclusion

#### Policies related to Diversity, equity and inclusion to own workforce [S1-1]

The Group's long-term ambition is to embrace and facilitate Diversity, Equity and Inclusion (DE&I) in all its dimensions in order to be an inclusive employer, to foster an environment of innovation and creativity, to help enhance business decisions and drive a culture where every person matters.

The Group has set up a Diversity, Equity and Inclusion Steering Committee to ensure the Group DE&I program presented hereafter is successfully implemented and the objectives achieved. It is composed of 10 members, among which three Executive Committee members as well as other senior members of various Functions and Business Areas Senior Managers.

The following policies were implemented by the Group particularly to prevent the negative impacts that were identified as material for this topic, that include the potential non-inclusion of persons with disabilities; and cases of violence and harassment (refer to disclosure requirement [ESRS 2 SBM-3] above):

- The Code of Conduct and Ethics strictly prohibits harassment in any form and discrimination of any kind, including on the basis of gender, age, nationality, religion, sexual orientation, marital, parental and family status, ethnicity, disability, affiliation or union membership;
- The Diversity, Equity and Inclusion Charter clearly articulates the shared commitment to achieving greater diversity, equity and inclusion across the Group. This charter, signed by the Group CEO, is available in 21 languages and is supported by a dedicated communication campaign on the sites.
- The Recruitment Policy underscores DE&I as a core Imerys value at every stage of the process, from preparation to onboarding, to foster a safe, inclusive environment where employees can thrive. Any decision relating to recruitment (as well as remuneration, implementation of benefits programs, internal mobility etc.) must be administered based on the principles of non-discrimination and harassment, as reflected within the Code of Conduct and Ethics. In some instances, positive action is encouraged: roles are required to have a diverse shortlist that is gender-balanced where possible and legally permissible, for instance.

Imerys openly shares its commitment to Diversity, Equity and Inclusion and keeps all its stakeholders, internally and externally, informed about the DE&I objectives and the results of the collective commitment by regularly reviewing its diversity, equity and inclusion performance in a continuous improvement cycle.

*The Diversity, Equity and Inclusion Charter is publicly available on Imerys.com.*

#### Taking actions on material impacts related to Diversity, equity and inclusion on own workforce [S1-4]

**Focusing on non-discrimination and equal opportunity**

The Group is dedicated to promoting Diversity, Equity and Inclusion at all levels of its operations, with a focus on non-discrimination and equal opportunity with regards to human resources management. To foster an inclusive culture, the Group works to:

- eliminate barriers, raise awareness about unconscious bias through DE&I communication and awareness campaigns, and help employees develop strategies to counteract these biases.
- implement various training programs, from onboarding new employees to providing ongoing resources and tools through the Imerys Learning Hub, to support these diversity and inclusion efforts.
- integrate DE&I as key components of the Group Leadership Competencies presented in the paragraph "Diversity, Equity and Inclusion action plan" below, the behavioral model against which the Group's formal performance appraisals are conducted.
- implement flexible work options in place, covering working locations (telecommuting options) as well as working hours (flexible time options). Imerys has adopted a blended model and policy that allows all eligible employees to work from home a specific number of days.

### Fostering gender equality

On March 14, 2022, the Group CEO, on behalf of Imerys, signed the United Nations Women's Empowerment Principles (WEPs). By signing the WEPs, Imerys commits to taking bold steps to advance gender equality in the workplace, marketplace and community and to accelerate its efforts to create a more gender-inclusive and equal organization aligned with the Group's long-term ambition. Imerys also started using the WEPs gender gap analysis tool, a voluntary self-assessment tool, on an annual basis to measure progress over time, benchmark against industry standards, and leverage equality resources in a continuous improvement cycle.

### Promoting disability inclusion

With regard to disability, Imerys runs annual campaigns on disability inclusion, seizing the opportunity to discuss the needs of employees with disabilities and how Imerys can better support them. Both Imerys' intranet page and the Imerys.com website have been built to ensure their content is accessible to all users, including users with disabilities who use Assistive Technologies (AT). Continuous testing and monitoring will continue to ensure that the Group maintains an accessible online experience for as large an audience as possible.

### Diversity, Equity and Inclusion action plan

The 2023-2025 action plan, is structured around 5 priorities:

| DE&I Governance | DE&I Enablement | DE&I Communication | HR Integration | Business Integration |
|---|---|---|---|---|
| Develop and embed a DE&I governance structure to increase the impact of DE&I efforts. | Enable and educate leaders, managers and employees to adapt inclusive mindsets. | Communicate the DE&I aspiration, creating more awareness at all levels of Imerys' organization. | Embed DE&I in policies and practices to make talent decisions more inclusive and help all employees thrive in Imerys. | Educate and enable the business to integrate DE&I into day-to-day operations. |

## Implementing training on DEI topics

All Imerys employees across hierarchical levels — **2024**

*Results at end 2024*

**45%** of people managers and paraprofessionals have completed the anti-discrimination training entitled "Professional Conduct: Supporting an environment of respect"

**48%** of DE&I ambassadors completed the customized workshops for this community

- **Internal workshops offered to functional management teams to raise awareness and provide concrete.**

**2** coaching sessions for the organizing committees of newly established Employee Resource Groups (ERGs)

HR Community and Business Managers — **2025**

*Expected outcome*

- **Train those involved in recruitment to promote DE&I and overcome implicit or unconscious biases.**

## Additional DE&I criteria in Group Recruitment Policy

Group wide — **2024**

*Expected outcome*

- **At least one qualified woman candidate in the shortlist candidates for all managers, experts and professional roles for line managers to consider for interview.**
- **If possible, interview at least one woman candidate for all managers, experts and professional roles by the line managers**
- **Interview panels for recruitment purposes for should include at least one woman**
- **At least 50% of the hired graduates, apprentices and interns in each country should be women, except where such requirements are prohibited by local laws.**

## Conduct an updated gender pay equity analysis

Group wide — **2024**

*Expected and actual outcome*

- **Increase the percentage of employees with grades falling within an explained or non significant pay gap to 99%.**

## Supporting women leadership

Group wide — **2025**

*Results at end 2024*

- **women's participation:**

**45%** in the Managing and Developing Your People(MDYP) training

**35%** in the Imerys Leadership Program

## Communication and awareness promotion

Group wide — **2024**

*Results at end 2024*

- **3 communication and awareness campaigns focusing on gender equity, multiculturalism and disability inclusion**
- **Internal articles on the intranet, showcasing initiatives on different DE&I dimensions**

## Internal communities on DE&I

Group wide and at country level — **2024**

*Expected outcome*

- **Group's internal network of 189 DE&I ambassadors to promote DE&I**

*Results at end 2024*

**5** newly established Employee Resource Groups (ERGs) on gender, parents and caregivers, cultural connections and mental health and well-being

## DE&I survey second edition

Representative sample of connected employees — **2024**

*Results at end 2024*

- **Achieved 85% in diversity statement and 83% in fairness of treatment statement**

## Improve selected sites' accessibility

All Imerys sites — **2025 onwards**

*Expected outcome*

- **Identify selected sites to allocate resources for facilities for women and accessibility for people with disabilities**

## Targets related to Diversity, Equity & Inclusion [S1-5]

Imerys has identified key material challenges, including the inclusion of people with disabilities and the prevention of harassment and violence in the workplace. To ensure the well-being of all its employees, the Group has set itself an ambitious target for 2025, incorporating specific criteria for the inclusion of people with disabilities. Other objectives have also been defined to improve the living environment and promote diversity, aiming to create a respectful and inclusive working environment, where every employee can flourish in complete safety.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Increase the score of the Diversity, Equity & Inclusion Index | 2022 | 66% | 2025 |
| | 0% | | 100% |

Imerys' Diversity, Equity and Inclusion Index is a composite metric developed to track diversity, equity and inclusion capturing its objectives of:

### DEI Index

**20%**

Gender

- Increase the number of women in senior manager roles
- Increase the number of women in manager/ expert/ professional roles

**20%**

pay gap

- Increase the percentage of manager/ expert/ professional and employees with grades falling within an explained or non significant pay gap

**20%**

Nationality

- Increase the percentage of underrepresented nationalities in senior manager roles

**20%**

Disability

- Increase the percentage of registered headcount with a disability

**20%**

Inclusion

- Increase engagement score for diversity and fairness of treatment statements through employee engagement survey

The DE&I Index is composed of five equally weighted metrics and can result in a score ranging from 0 to +100. The mid-term target for the Group is to increase the score of the Diversity, Equity & Inclusion Index to 100% by the end of 2025. Imerys has adopted a comprehensive approach to define and set the DE&I Index, incorporating both internal perspectives by stakeholders and external insights by experts. The collaborative and data-driven approach ensures that the DE&I targets are aligned with industry standards and Imerys organization's strategic objectives.

The DE&I Index is also part of the variable remuneration of members of the Executive Committee as well as some senior managers reporting to them. At the end of 2024, the achievement of the Group DE&I Index is at 66% out of the target of 100% at the end of 2025.

## Metrics related to Diversity, Equity & Inclusion [S1-9 & S1-12]

| Metrics related to registered headcount by gender | Unit | 2024 | 2023 |
|---|---|---|---|
| Number of women Board members | # | 4 | 5 |
| Number of women at top management level[1] (NEW) | # | 26 | - |
| Number of women Executive Committee members (NEW) | # | 3 | - |
| Number of women in Senior Management roles[2] (NEW) | # | 23 | - |
| Number of women in manager/expert/professional roles (NEW) | # | 1,415 | - |
| Number of women in Paraprofessional roles (NEW) | # | 1,142 | - |
| **Number of women in the Group (NEW)** | **#** | **2,583** | **-** |
| Percentage of women Board members | % | 40% | 50% |
| Percentage of women at top management level[1] (NEW) | % | 28% | - |
| Percentage of women Executive Committee members | % | 33% | 33% |
| Percentage of women in senior management roles[1] | % | 27% | 27% |
| Percentage of women in manager/expert/professional roles | % | 33% | 32% |
| Percentage of women in Paraprofessional roles | % | 14% | 13% |
| **Percentage of women in the Group** | **%** | **21%** | **20%** |

In 2024, the representation of women in Imerys Executive Committee and senior management roles remained unchanged. The overall proportion of women across the organization, including in managerial, expert, and professional positions, showed a slight increase. Organizational changes occurred during this period. Despite the divestitures that have impacted the proportion of women in the workforce in 2024, Imerys' commitment to diversity and inclusion remains unwavering. At constant scope, the Group maintains the balanced gender distribution and actively pursue recruitment efforts to promote equal opportunities. Efforts to increase the proportion of women in all levels of the organization shall continue in the coming years, with an emphasis on senior management and manager, expert and professional roles.

| Metrics related to registered headcount by age bracket | Unit | 2024 | 2023 |
|---|---|---|---|
| Percentage of employees with less than 30 years | % | 13% | 12% |
| Percentage of employees from 30 to 50 years | % | 52% | 53% |
| Percentage of employees over 50 years | % | 35% | 35% |

The Group age pyramid structure has remained relatively stable over the past years, which provides a solid basis for the Group to continue to grow and develop internal skills and competencies and ensure solid technical and managerial expertise. To further support and build on the benefits of an age-diverse workforce, Imerys continues to recruit across all age brackets.

| Metrics related to disability | Unit | 2024 | 2023 |
|---|---|---|---|
| Number of women employees with a disability in the Group (NEW) | # | 40 | - |
| Number of men employees with a disability in the Group (NEW) | # | 114 | - |
| **Number of employees with a disability (headcount)** | **#** | **154** | **195** |
| Percentage of Registered headcount with a disability | % | 1.24% | 1.42% |
| Percentage of women employees with a disability in the Group (NEW) | % | 1.55% | - |
| Percentage of men employees with a disability in the Group (NEW) | % | 1.16% | - |
| **Percentage of persons with disabilities in the Group subject to legal restrictions on the collection of data (NEW)** | **%** | **1.33%** | **-** |

In 2024, a change was observed in the proportion of employees declaring a disability. This evolution is primarily due to organizational changes, particularly divestitures. Imerys remains fully committed to continue working towards increasing the proportion of employees with disabilities within the Group. Imerys is also improving its internal reporting tools to ensure an accurate and comprehensive representation of the disability diversity. The Group maintains its dedication to creating an environment where employees of all physical and mental abilities are accepted and valued. This focus will remain a key element of the Group Diversity, Equity and Inclusion program for the coming years. Imerys continues to prioritize increasing the percentage of registered headcount with a disability through policy reviews, education, awareness and accessibility actions at site. The target set for the composite Diversity, Equity and Inclusion Index also encompasses disability.

1 Top management level includes not only Executive Committee members but also Senior Management roles.
2 Senior management roles include the roles that directly report to Executive Committee members (excluding assistants/secretaries, etc.) or directly report to the Chief Information Officer or Business Area Purchasing Directors.

With regard to this data on the representation and inclusion of people with disabilities within Imerys, as definitions of "disability" vary from country to country in legal terms, the Group has carefully adapted the approach to take account of these differences while ensuring consistent reporting across its businesses. In countries with broader legal definitions, the data includes individuals who may not be recognized as disabled under narrower interpretations in other jurisdictions. This approach, while inclusive, can affect comparability between regions. To address this, the Group has adopted an internally standardized reporting framework, supplemented by localized data notes that highlight these jurisdictional variations. Data collection focuses on gathering information from countries where Imerys is legally allowed to do so, and records any variations in disability definitions across various regions. The Group regularly[1] revises its methodology to adapt to changing legal frameworks and improve data accuracy. By providing this contextual information, Imerys aims to present a transparent overview of efforts to support disabled employees while recognizing the complexities introduced by various legal landscapes. Imerys does not collect disability data in jurisdictions where this practice is prohibited by law.

## 1.3.1.6. Training and skills development

Providing continuous learning is essential and a continuing process for every employee at every level of the organization. At Imerys, formal training serves as one key element amongst several development opportunities available to employees.

### Policies related to training and skills development to own workforce [S1-1]

Talent development is critical to fostering an innovative, engaged and motivated workforce, ensuring strong long-term growth across the Group. With the labor market constantly evolving, Imerys recognizes the potential short term challenges this presents and addresses them through a comprehensive talent roadmap aiming at improving human resources processes, focusing on talent acquisition, employer branding, internal mobility, professional learning and development and retention.

To that end, the Group has adopted two policies which cover all employees:

- Learning policy, Clarifies and structures the Imerys learning organization ensuring employees have access to development opportunities tailored to their needs.
- Performance policy, outline the Performance Appraisal and Development (PAD) process;
- In addition, a global internal mobility policy offers permanent employees a streamlined process to develop them by:
- Explore new challenges and new businesses within Imerys;
- Meet personal aspirations for career growth and evolution;
- Enhance collaboration across business areas, and;
- Strengthen Group culture and mindset.

The Chief Human Resources Officer is responsible for monitoring the implementation of these policies, and that apply universally to all employees, entities and geographies within the Group.

Internal mobility: A key to employee retention

Supporting internal career growth and career moves across the Group is a priority for Imerys. This is implemented through:

- Specialized committees that meet regularly to discuss internal mobility and promotion opportunities.
- Succession planning is an annual process of reviewing the succession pipeline for a number of managerial and key professional positions.
- Performance Journey a robust and comprehensive performance management system that evaluates both competencies development and achievement of numerical objectives.

In 2024, with regards to competencies assessment, the new Imerys Leadership Competencies were introduced to reflect the Purpose, Vision and Values of the Group. These competencies are assessed between employees and their managers during annual reviews. The framework includes:

- Cares for self and others: how employees demonstrate self-awareness and nurture an inclusive and safe environment, empowering people to do their best.
- Collaborates for success: how employees work together across boundaries to achieve shared goals.
- Commits to customers: how employees understand (internal and external) customer needs and take action to meet them.
- Drives results: how employees deliver sustainable results and strive for excellence.
- Shapes the future: how employees think in long-term scenarios, anticipate future challenges and opportunities while prioritizing sustainability.


1 The latest review happened in November 2023.

### The Imerys Learning Hub: Imerys' platform for Employee Development

At Imerys, empowering employees to take charge of their development is a key priority.  This is achieved by continuously diversifying and increasing the Group's training programs through a blended learning approach that combines in-class and digital training and enabling employees to actively lead their own development and learning experience.

The Group's entire learning offering is centralized and hosted on a platform called the "Learning Hub", a platform accessible to over 6,300 employees with Imerys e-mail accounts. The Imerys Learning Hub brings together all in-class training and digital learning courses, for diverse learning opportunities, covering topics such as:

- Safety, environment,
- Finance, management and leadership,
- Project management,
- Commercial excellence and industrial marketing, and
- Geology and mining fundamentals, amongst other topics.

All learning resources are available in English and many are also available in other languages, including French, Brazilian Portuguese, German and Chinese. In addition to transversal topics, the Imerys Learning Hub hosts global training courses tied to the Group Code of Conduct. While these courses are open to all employees, they are mandatory for specific targeted populations

The platform also features sustainability focused courses from the UN Global Compact Academy as well as Group organized training and awareness raising sessions on Human Rights based on UN Guiding Principles. These sessions aim to support employees identify and address potential risks to human rights in their areas of responsibility.

### Thematic programs for skill development

To ensure that employees are equipped with the skills they need for current and future challenges, Imerys has developed targeted programs to support employees to regularly upgrade and improve their skills.  Examples include: The "Imerys Leadership Program" and "Lead My Team Program" presented in the above section. The mission of both initiatives is to support key talents in a leadership development journey to cultivate their mindset and skills for current and future success within the business and organizational context within which they work.

Onboarding is the final and vital stage in the recruitment process.  It helps employees integrate seamlessly into the organization while reinforcing the Groups' commitment to diversity and inclusion. Imerys has implemented a digital global onboarding program to ensure global consistency across the Group .and streamline the process for the new hires. This ensures that every newly recruited employee has a clear understanding of Imerys in their first 90 days. The onboarding program guides new recruits through valuable information, including Imerys'' organization and tools, markets, customers, mandatory training (including the Code of Business Conduct and Ethics, safety, diversity, equity and inclusion, cybersecurity, and sustainability) as well as Business Area, function, and country-specific content.

The Group also runs an onboarding program for operational workers across the Group. It defines the minimum requirements to control health and safety risks related to the onboarding period for new operational workers for which Imerys has managerial authority, and/or has a strong and direct influence, at all Imerys industrial sites. The Group likewise focuses on induction training for Imerys' new plant managers to help them understand the Group's approach to operational excellence and continuous improvement, covering topics such as safety, processes, finance, HR, and environment.

## Taking actions on material impacts related to training and skills development [S1-4]

### Imerys Leadership Competencies (ILCs)

All Imerys employees — **Permanent action**

*Expected outcome*

- Five core competencies that are the foundation for fostering excellence and growth within Imerys, in line with the Group Purpose and Values of Unlocking Better Futures.
- ILCs depicts the behaviors expected, on the ways employees achieve their goals, drive their personal development, and contribute to the Group's success.
- ILCs clearly and simply set out what behaviors Imerys encourages and values.
- Embedding ILCs in all HR processes such as learning and development programs, performance and reward.

### Imerys Leadership Program

Managers, Experts and Professionals identified in the Organization & People Review process — **2025**

*Expected outcome*

- Equips leaders with the mindset and skills to drive Imerys forward
  - Strong leadership pipeline to provide Imerys with the leaders of tomorrow
  - Creating a consistent and common culture of inclusive and authentic leadership
  - Accelerating the success of key managers

### Lead My Team Program

Operations Sites Managers, Supervisors, Team Leaders — **Permanent action**

*Expected outcome*

- Group-wide initiative launched that aims at training supervisors in managerial techniques to:
  - provide them with skills and behaviors to improve their team and business performance
  - develop and improve a strong safety culture
  - create a continuous improvement culture.

## Trainings, skill & development metrics [S1-13]

| Metrics related to training and skills development | Unit | 2024 | 2023 |
|---|---|---|---|
| Number of trained employees | # | 11,250 | 12,865 |
| **Number of training hours by year** | **#** | **248,218** | **259,568** |
| *Of which environment, health and safety related training* | *#* | *126,610* | *144,561* |
| *Of which technical skills training* | *#* | *100,275* | *91,335* |
| *Of which management training* | *#* | *21,333* | *23,673* |
| **Percentage of employees that participated in regular performance and career development reviews (NEW)** | **%** | **57%** | - |
| Percentage of women employees that participated in regular performance and career development reviews (NEW) | % | 80% | - |
| Percentage of men employees that participated in regular performance and career development reviews (NEW) | % | 51% | - |
| **Average number of training hours per employee (NEW)** | **#** | **20** | - |
| Average number of training hours per woman employee (NEW) | # | 15 | - |
| Average number of training hours per man employee (NEW) | # | 21 | - |

2024 marked a transformative year for training and development at Imerys. The Group launched the Imerys Performance Journey, a strategic initiative set for full implementation in 2025. This program provided extensive training for managers and HR professionals throughout the year. This contributed to a 10% increase in technical skills training compared to 2023 and a 14% rise in the percentage of employees participating in regular performance and career development reviews. Additionally, the Imerys Learning Hub was celebrated during a dedicated Learning Week, offering a wide range of self-development opportunities. This initiative helped drive a 5% increase in average training hours compared to 2023. Within the Learning Hub, DE&I and Sustainability programs hold a special place, reinforcing Imerys' commitment to fostering an inclusive and responsible workplace. It is important to note that these figures were impacted by the divestiture of activities, which influenced overall training participation metrics. Nevertheless, the Group remains dedicated to investing in its people's growth and development.

### 1.3.1.7. Labor practices and working conditions

Imerys strives to promote mutual respect in all practices and dealings with its employees and non-employees working on its sites. The Group is committed to complying with local legislation in force in the countries where it operates and to respect internationally recognized human rights, as set out in the International Bill of Human Rights and provisions of the fundamental conventions of the International Labour Organization (ILO), particularly in terms of non-discrimination, privacy, child labor, forced labor, compensation and working hours. The Group is committed to respecting human rights, avoiding complicity in human rights abuses and providing access to remedy, in line with the UN Guiding Principles on Business and Human Rights. Imerys is fully committed to taking effective measures to end discrimination and to eradicate child labor and forced labor. Imerys endeavors to have a positive impact on employees' welfare through its employment practices, which likewise have both indirect and induced positive impacts on surrounding communities and thereby contribute to SDG 8 to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

The Group Code of Business Conduct and Ethics spells out the fundamental principles and shared commitments to ethical behavior, including respect of human rights and labor practices. The Code applies to all Imerys employees, including those of its subsidiaries, as well as Imerys' business partners. Managers at Imerys have a particular responsibility to ensure its daily application because of their roles and responsibilities with regard to Group operations.

Compliance with the Code and policies on human rights and labor practices, including preventing child labor and forced labor, is included within due diligence assessment for new projects and new business relations (mergers, acquisitions, joint ventures) and within the scope of internal auditing missions for the Group existing activities. Policies on prohibition of child labor and forced labor have been in place since 2009.

The Group has developed a global and comprehensive program for benefits management. All the healthcare, death and disability benefits provided to its employees are mapped, to ensure that levels of coverage are harmonized across the Group, in line with local regulations and market practice and managed in a structured and efficient way. The Group Pension Committee governance principles, objectives and operating modes are applicable across Imerys sites.

The Group compensation and benefits systems and policies aim at ensuring market competitiveness, internal consistency, and equal pay for work of equal value, while being driven by a clear pay-for-performance objective. Imerys' global grade grid and position evaluation system provide a rational and consistent basis for the maintenance of the pay structure and foster transparency. The Group endeavors to align its remuneration practices across the world with international standards.

Fixed compensations are reviewed on a yearly basis under the close coordination of the Human Resources function, supported by regular local and/or sectoral surveys. Short-term variable pay schemes consist of both individual and shared objectives. These are also adjusted annually using the management by personal objectives approach, or sometimes multidimensional performance appraisals (360degree feedback). Agile conversations on performance are also advised all year long.

In 2024, the Imerys CEO, all the Executive Committee and most senior managers had individual objectives linked to the achievement of the Group's mid-term sustainability objectives. Long-term compensation programs are fully aligned to the Group's long-term financial and sustainability objectives.

For more information on Executive Compensation, see chapter 4, section 4.3 of the Universal Registration Document.

### 1.3.1.8. Additional metrics related to Imerys' own workforce [S1-6, S1-7 & S1-11, S1-17]

#### Characteristics of Imerys employees [S1-6 and S1-7]

| Metrics related to registered headcount | Unit | 2024 | 2023 |
|---|---|---|---|
| **Number of employees (Headcount)** | **#** | **12,392** | **13,698** |
| *of which permanent employees* | *#* | *10,829* | *12,931* |
| *of which non-permanent employees* | *#* | *363* | *767* |
| *of which non-guaranteed hours (NEW)* | *#* | *1,200* | *NA* |
| Average number of employees (Headcount) (NEW) | # | 12,896 | 13,910 |
| **Number of non-employees[1] (NEW)** | **FTE** | **1,086** | - |
| *of which temporary agency worker (NEW)* | *FTE* | *1,047* | - |
| *of which self-employed workers (NEW)* | *FTE* | *39* | - |

As of December 31, 2024, the Group's workforce stands at 12,392 employees, reflecting a decrease from the previous year. This change in the workforce is primarily attributed to strategic portfolio adjustments, such as the divestiture of assets in the paper market sector. Despite these organizational changes, Imerys remains committed to its core business areas and continue to focus on delivering value to its stakeholders while adapting to evolving market conditions. Refer to chapter 6.1, Note 8 "Staff expenses" for more information about financial indicators related to Imerys employees.

| Metrics related to number of employees by gender (Headcount) | Unit | 2024 | 2023 |
|---|---|---|---|
| Men | # | 9,809 | 11,004 |
| Women | # | 2,583 | 2,686 |
| Other | # | 0 | - |
| Not reported | # | 0 | 8 |
| **Total Employees** | **#** | **12,392** | **13,698** |

Despite the divestitures that have impacted the proportion of women in Imerys workforce in 2024, the Group commitment to diversity and inclusion remains unwavering. At constant scope, Imerys maintains the balanced gender distribution and actively pursues recruitment efforts to promote equal opportunities.

| Number of employees by country (Headcount) | Unit | 2024 | 2023 |
|---|---|---|---|
| France | # | 2,084 | 2,041 |
| United States of America | # | 1,910 | 1,992 |
| China | # | 1,274 | 1,305 |
| Other countries | # | 7,124 | 8,360 |
| **Total Employees** | **#** | **12,392** | **13,698** |

In 2024, only three countries employed more than 50 employees while representing over 10% of the total workforce. These three countries represent more than 40% of Imerys registered employees. Out of the 40 countries, over half (24) have a workforce exceeding 50 employees, representing from 0.5% to 8.4%.

1 The total hours worked by non-employees are converted to Full-Time Equivalent by divided the annual non-employees worked hours by 12 and then by the monthly statutory hours of a permanent employee in the respective countries.

| Reporting period | 2024 | | | | | 2023 | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Women | Men | Other* | Not disclosed | Total | Women | Men | Other* | Not disclosed | Total |
| Number of employees | 2,583 | 9,809 | 0 | 0 | 12,392 | 2,686 | 11,004 | - | 8 | 13,698 |
| Number of permanent employees | 2,333 | 8,496 | 0 | 0 | 10,829 | 2,466 | 10,457 | - | 8 | 12,931 |
| Number of temporary employees | 144 | 219 | 0 | 0 | 363 | 220 | 547 | - | - | 767 |
| Number of non-guaranteed hours employees (NEW) | 106 | 1,094 | 0 | 0 | 1,200 | - | - | - | - | - |
| Number of full-time employees | 2,406 | 9,718 | 0 | 0 | 12,124 | 2,520 | 10,916 | - | 8 | 13,444 |
| **Number of part-time employees** | **177** | **91** | **0** | **0** | **268** | **166** | **88** | - | - | **254** |

The structural changes observed in 2024 are related to the divestiture of activities and the introduction of the 'non-guaranteed hours employee' category.

| Reporting period | 2024 | | | | | 2023 | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Europe | Americas | Asia-Pacific | Africa & Middle East | Total | Europe | Americas | Asia-Pacific | Africa & Middle East | Total |
| Number of employees | 6,257 | 3,452 | 2,143 | 540 | 12,392 | 6,681 | 4,076 | 2,342 | 599 | 13,698 |
| Number of permanent employees | 5,972 | 2,234 | 2,124 | 499 | 10,829 | 6,378 | 4,047 | 1,949 | 557 | 12,931 |
| Number of temporary employees | 265 | 38 | 19 | 41 | 363 | 303 | 29 | 393 | 42 | 767 |
| Number of non-guaranteed hours employees (NEW) | 20 | 1,180 | 0 | 0 | 1,200 | - | - | - | - | - |
| Number of full-time employees | 6,003 | 3,444 | 2,137 | 540 | 12,124 | 6,441 | 4,069 | 2,336 | 598 | 13,444 |
| Number of part-time employees | 254 | 8 | 6 | 0 | 268 | 240 | 7 | 6 | 1 | 254 |

In 2024, the breakdown of employees by region remains similar to 2023. 50% of the employees are located in Europe, mainly in France and the United Kingdom, 28% are located in the Americas and 17% in Asia.

| Metrics related to turnover | Unit | 2024 | 2023 |
|---|---|---|---|
| Number of employees who have left Imerys during the year (NEW) | # | 1,453 | 1,567 |
| Rate of employee turnover (NEW) | % | 11.7% | 11.8% |

Despite the structural changes Imerys experienced in 2024, the turnover rate has remained stable.

* Missing footnote

## Collective bargaining coverage and social dialogue metrics [S1-8]

| Metrics related to collective bargaining agreement | Unit | 2024 | 2023 |
|---|---|---|---|
| Employees under collective bargaining agreement | % | 67% | 66% |

| | Collective Bargaining Coverage | | Social dialogue |
|---|---|---|---|
| **Coverage rate by country or region** | Employees – EEA (for countries with >50 empl. representing >10% total empl.) | Employees – Non- EEA (estimate for regions with >50 empl. representing >10% total empl.) | Workplace representation (EEA only) (for countries with >50 empl. representing >10% total empl.) |
| 0-19% | | | |
| 20-39% | | North America | |
| 40-59% | | | |
| 60-79% | | Asia | |
| 80-100% | France | | France |

## Social protection [S1-11]

Imerys' global and comprehensive program (Global Management System) for benefits management maps all the healthcare, death and disability benefits provided to its employees. This program ensures harmonized coverage levels across the Group, aligning with local regulations and market practices while maintaining efficient management. The Group Pension Committee's governance principles, objectives and operating modes are applicable across Imerys sites. All Imerys employees in countries covered by the Global Management System benefit from social protection. This represents 98% of Imerys' workforce. This system streamlines benefit administration and ensures consistent coverage across the organization.

| Metrics related to social protection | Unit | 2024 | 2023 |
|---|---|---|---|
| Percentage of employees covered by social protection (NEW) | % | 98 | - |

## Incidents, complaints and severe human rights impacts [S1-17]

| Metrics related to incidents, complaints and severe human right impacts | Unit | 2024 | 2023 |
|---|---|---|---|
| Number of incidents of discrimination (including harassment) (NEW) | # | 4 | - |
| Number of other workforce-related complaints (NEW) | # | 10 | - |
| Number of reported severe human rights incidents (NEW) | # | 0 | - |

## Remuneration ratio [S1-16]

### 1. Scope

The annual remuneration ratio covers all Imerys employees worldwide, reflecting the diversity of Group activities and compensation practices. To ensure data reliability and consistency, certain categories of employees are excluded (e.g., non-active staff, part-time employees, obviously incorrect remuneration, missing annual salaries, etc.). In 2024, these exclusions account for 6% of the total workforce. The worldwide average and median remuneration at Imerys includes the base salary and fixed bonuses only. For reliability reasons, all variable bonuses have been excluded.

### 2. Methodology

The highest remuneration considered is that of the CEO. There are two approaches to distinguish:

Adjusted Remuneration Ratio (salary + fixed bonuses): Presented in a table showing the evolution over the last five financial years, providing a long-term perspective. Both the numerator and denominator are based on the adjusted remuneration.

Total Compensation Ratio: For the 2024 financial year, the ratio for the highest remuneration (numerator) includes all elements of compensation, namely the fixed portion, the annual variable portion, and any other benefits. The denominator remains unchanged and includes only the base salary and fixed bonuses.

This dual presentation helps in understanding how remuneration evolves over time (fixed components) while also offering a more comprehensive snapshot for the current year (global remuneration).

### 3. Results and Interpretation

The results of the annual remuneration ratio reflect Imerys' position as an international Group operating in multiple countries, each with potentially different pay levels and tax systems. Any comparison between the CEO's remuneration and that of all employees should therefore be viewed in the context of these local specifics, currency fluctuations, and regional pay practices. The publication of the ratio includes:

- Five-year evolution table: see below, showing the evolution of the adjusted remuneration ratio (salary + fixed bonuses)
- 2024 Global Remuneration Ratio: 140.6. Based on total remuneration (including annual variable components) as described in Chapter 4, section 4.3.2.1 of the Universal Registration Document.

These elements provide a comprehensive and transparent view of the Group's remuneration policy, while taking into account the methodological constraints resulting from the diversity of Imerys' locations.

| Metrics related to remuneration ratio | 2024 | 2023 | 2022 | 2021 | 2020 |
|---|---|---|---|---|---|
| Median remuneration ratio (NEW) | 26.6 | 29.6 | 28.7 | 29.7 | 28.4 |
| Average remuneration ratio (NEW) | 22.2 | 23.4 | 22.8 | 24.8 | 23.6 |

## 1.3.2. Workers in the value chain [ESRS S2]

Imerys believes that high standards in all environmental, social and governance areas are essential for all of its business operations across the globe. The Group expects its suppliers to adhere to the same principles as elaborated within the Group Code of Business Conduct and Ethics.

### 1.3.2.1. Impact, risk and opportunity related to workers in the value chain [SBM-3]

As part of its Vigilance Plan presented in Part II of the present chapter, the Group has established a specific risk mapping process to identify, assess and prioritize, human rights, health, safety and environmental risks within its suppliers in different geographical areas, referred to as the "Duty of Care risk mapping process". The results of the Duty of Care risk mapping process are integrated as appropriate with the double materiality analysis presented in disclosure requirement [ESRS 2 SBM-3] of the present chapter. Based on this risk assessment, the Group has identified potential health and safety risks within its value chain further described in the table hereafter.

| ESRS S2. Workers in the value chain | | | |
|---|---|---|---|
| Materiality | Location within the value chain | Description of the IRO | Time horizon |
| **Sub-topic: Occupational illness** | | | |
| ⊝ Potential negative impact<br>Punctual | ← Upstream value chain<br>(Raw materials, Mining, Energy, Transport, Packaging, Chemicals, Industrial services and General services categories) | The activities of Imerys subcontractors/suppliers may have negative impacts on their employees in the event that they do not provide adequate protection to employees to prevent occupational diseases | ●●○<br>Medium |
| **Sub-topic: Occupational injury** | | | |
| ⊝ Potential negative impact<br>Punctual | ← Upstream value chain<br>(Mining, Transport, Packaging and Industrial services categories) | The activities of Imerys subcontractors/suppliers may have negative impacts on their employees in the event that they do not provide adequate protection to employees to prevent occupational injuries, life changing accidents or fatalities | ●●○<br>Medium |

#### Identification of groups within the value chain subject to material impacts

For health and safety impacts described above, it is necessary to distinguish two main categories of workers within the value chain:

- Contractors working on the Group operations who are not part of Imerys workforce, such as subcontractors and vendors who provide specialized services or products. These workers are including in "other workers" category described in [ESRS S1] of the present chapter.
- Workers working for operations in Imerys upstream and downstream value chain who perform their work at supplier's facilities or under supplier supervision. Due to the inherent nature of their activities, operational workers, which are working in Raw materials, Mining activities, Mining materials, Transport, Chemicals, Packaging, Industrial services and General services are therefore more exposed to potential risk regarding health and safety impacts.

### 1.3.2.2. Policies related to value chain workers [S2-1]

With regards to health and safety policies covering contractors working on the Group operations, refer to [ESRS S1], section 1.3.1.3 of the present chapter.

For the workers working in the upstream and downstream value chain as described in the section above, the Group implemented since 2018 a comprehensive responsible purchasing policy, based on Supplier Environmental, Social and Governance Standards ("Supplier ESG Standards").

These standards outline the minimum requirements Imerys expects of its suppliers for all operations under Supplier's own control. The Standards are based on the fundamental principles of Human Rights, as defined by the Universal Declaration of Human Rights (United Nations 1948), the Fundamental Conventions of the International Labor Organization (ILO), the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (2011) and the Ten Principles of the UN Global Compact (2000).

#### Health and safety supplier standards

More specifically, with regards to health and safety, the suppliers are required to:

- Comply with all applicable occupational health and safety regulations;
- Implement a health and safety management system in line with recognized international standards;
- Comply with applicable Imerys occupational health and safety policies and procedures for any works being undertaken by suppliers on Imerys sites;
- Identified, assessed and mitigated all health and safety hazards to as low as reasonably practicable;
- Take the necessary actions to prevent accidents, work related injuries and occupational illnesses;
- Ensure that all workers exposed to specific health and safety hazards received effective and appropriate training;
- Provide the workers under supplier's responsibility with the appropriate personal protective equipment.

#### Human right-related supplier standards

With regards to human rights related matters, the suppliers are required to:

- Respect internationally proclaimed human rights of all employees, contractors, and third-party employees as well as the communities in which they live.
- Prevent child labor in full accordance with the ILO conventions including on the age limits and type of work permitted.
- Eliminate all forms of forced, compulsory labor and human trafficking in full accordance with the ILO conventions.

In addition to social aspects, the Supplier ESG Standards cover a broader panel of topics such as environmental stewardship, climate change, and business conduct. Aligned with the Group Code, the Sustainability Charter and Imerys' SustainAgility ambition, they have been translated into 23 languages.

### 1.3.2.3. Processes for engaging with value chain workers about impacts [S2-2]

Imerys demonstrates its commitment to responsible business practices by engaging in regular business reviews with its main suppliers. During these structured meetings, the Group creates an open forum for dialogue, where supplier representatives are encouraged to voice any concerns related to health and safety issues or human rights matters. This proactive approach allows Imerys to address potential problems promptly and collaboratively. By giving suppliers the opportunity to raise critical aspects, this allows for identifying and mitigating risks but also contributing to continuous improvement in workplace conditions and ethical practices across Imerys' network of suppliers. This ongoing engagement underscores Imerys' holistic approach to sustainability and its recognition of the vital role suppliers play in achieving responsible business objectives.

### 1.3.2.4. Processes to remediate negative impacts and channels for value chain workers to raise concerns [S2-3]

Local procurement managers and purchasers are the primary contacts for worker representatives such as sales managers to raise concern. However, they are free to report any negative impact through the channel described above or by using the alert system described in disclosure requirement [ESRS G1-1] section 1.4.1.3, paragraph "Alert system and protection of whistleblowers" of the present chapter. The remediation process is then the same as for any other matter raised through this channel; a dedicated team is set up to investigate the alert, and mitigation measures are drawn up based on its findings. Quick access to the online alert system is provided within the Supplier ESG Standards, which are signed and acknowledged by suppliers.

### 1.3.2.5. Taking action on material impacts on value chain workers [S2-4]

In 2019, the Group began the roll-out of a comprehensive responsible purchasing program integrating environmental, social and governance matters. This program encompasses key risk prevention and mitigation measures including (but not limited to):

- Supplier ESG Standards: as described in section [ESRS S2-1] above, this code is communicated to all suppliers and forms an integral part of the contractual agreements.
- Supplier selection and onboarding: sustainability criteria, including health & safety, human rights, labor, ethics, environmental and supply-chain management practices, are integrated into the supplier selection process. Potential suppliers are evaluated based on their commitment to these principles and their EcoVadis score (as described hereafter). Recognizing that a comprehensive EcoVadis assessment can require up to three months to complete, new or prospective suppliers may not have a rating available at the time of sourcing. In such cases, it may initiate business relationships, while simultaneously initiating the EcoVadis assessment process. This approach allows Imerys to onboard necessary suppliers while ensuring promptly commitment to sustainability.
- Imerys utilizes and leverages EcoVadis as a key tool for evaluating the sustainability performance of its suppliers and to drive continuous improvement of the supply chain. If a supplier's score falls below the threshold (which is category-specific based on materiality), it is initiated a corrective action plan process. This collaborative approach involves working with the supplier to develop and implement targeted improvements.
- On-site audits: for critical raw materials, as defined in the Vigilance Plan presented in Part II, where EcoVadis assessments are not yet available, independent on-site audits are conducted to gain a comprehensive understanding of their operations and ensure alignment with Imerys sustainability standards.
- Training and awareness: Imerys buyers are trained on key aspects of the responsible purchasing program to support its implementation, recognize risks and develop mitigation actions.

In the case Imerys has a reasonable suspicion that a supplier is directly committing - or sourcing from any party committing - a serious violation of the Standards despite the risk prevention and mitigation measures, the Group may suspend or terminate the relationship with supplier, without any liability toward the Supplier.

### 1.3.2.6. Target related to workers in the value chain [S2-5]

In 2022, the Group defined mid-term sustainability objectives based on the double materiality assessment process and results presented in disclosure requirements [ESRS 2 SBM-1], [ESRS 2 IRO-1] and [ESRS 2 SBM-3 - S2] of the present chapter. In accordance with the responsible purchasing program described above, the mid-term target for the Group is to deploy a sustainability rating scheme covering at least 75% of Group Suppliers (by spend) by the end of 2025. The supplier engagement strategy prioritizes suppliers with an annual spend exceeding €100,000. This amount gathers the spend coming from several supplier legal entities to ensure a large and comprehensive coverage. It reflects a risk-based approach to due diligence.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Deploy a sustainability rating scheme of Group suppliers (by spend) | 2022<br>53% | 70% | 2025<br>75% |

At the end of 2024, the Group supplier sustainability rating scheme based on EcoVadis covered 70% of Group suppliers (by spend). With regards to health and safety,

- Imerys utilizes the 360° watch EcoVadis feature to identify any adverse reports concerning employee at partner's facilities.
- When subcontractors are performing works in Imerys premises, it is applied the same rigorous health and safety standards outlined in their group policies (refer to [ESRS S2-1] above), ensuring consistency with the internal employee practices. In this context, health and safety performance indicators related to contractors working on the Group operations are presented in section 1.3.1.3 within [ESRS S1].

## 1.3.3. Affected communities [ESRS S3]

Imerys commits to building a legitimate "social licence to operate" in the communities and countries in which it operates. The Group sees this as an essential foundation for its business activity. Imerys therefore aims to enter into dialogue and engage with key stakeholders in a spirit of transparency and good faith. Working around the world, Imerys' operations and employees are part of the local communities that surround Group sites and are seen as representatives of the Group.

### 1.3.3.1. Interest and views of Stakeholders [SBM-2]

The Group actively encourages sites and employees to contribute to the socio-economic development of their respective communities by not only identifying and understanding stakeholders' needs and expectations, but also actively contributing talents and skills and supporting initiatives that create shared value. Working in a collaborative and constructive manner with local partners, communities, associations and other stakeholders helps the Group contribute to numerous Sustainable Development Goals through its operations.

Imerys recognizes that proactive, inclusive, accountable, and transparent stakeholder engagement is more likely to result in optimal outcomes for both communities and the Group. Given the variety of countries and contexts across which Imerys operations occur, engagement with local stakeholders can take many forms. Each form of engagement is an opportunity for Imerys to understand and take into consideration the interest and views of its local stakeholders and affected communities. Across the Group a number of local committees or local stakeholder forums exist. These formal committees may dedicate members who either volunteer or are elected to represent their local community in regularly scheduled meetings held together with representatives of the Group to discuss forthcoming operations, development projects, outreach initiatives, and a range of other subjects appropriate to the context. The Group likewise hosts a number of open door days during which local residents, including local schools, are invited to learn more about industrial minerals operations. Often these open door days coincide with European Minerals Days, an initiative of the European Industrial Minerals Association. Similarly, tours and visits are often organized for groups of interested stakeholders, including local administrative representatives or local associations. Several sites also contribute to or are located near museums dedicated to geology and industrial minerals, which provide information on the extraction and transformation processes linked to Imerys operations.

Notwithstanding efforts to establish constructive local stakeholder engagement, grievances may occur. Grievances can involve a wide spectrum of subjects, questions or issues and represent both minor preoccupations and far more serious conflicts. With the community grievance mechanism policy, updated in 2023, Imerys aims to address all grievances received, regardless of whether they stem from real or perceived issues and whether the complainant is named or anonymous. The community grievance mechanism is used to report such concerns and grievances. In addition, the Group has a whistleblowing process detailed in disclosure requirement [ESRS G1-1] section 1.4.1.3, paragraph "Alert system and protection of whistleblowers" of the present chapter, which provides multiple ways for the external stakeholders who are aware of circumstances they believe to represent violations of Imerys' Code of Business Conduct and Ethics or legal requirements to report them directly via a dedicated platform.

### 1.3.3.2. Impact, risk and opportunity management [SBM-3]

#### Identification of affected communities groups

As defined by the CSRD, the term "affected communities" refers to groups of people living or working in the same area that have been or may be affected by a reporting undertaking's operations or through its upstream and downstream value chain. Therefore, the local context of each operation should be considered. However, as the Group operates in more than 150 sites located in 33 countries, whether in rural, urban and industrial areas, the identification of material impacts, risks and opportunities for each single group of affected communities remains one of the biggest challenges.

Nonetheless, Imerys defined three important communities at Group level to identify more precisely how and to what extent it affects its local communities. Thus, the "affected communities" considered in the following disclosure requirements encompass:

- people living and/or working in the immediate vicinity of Imerys sites;
- remote communities affected directly or indirectly by the activity of those sites;
- communities directly or indirectly impacted by the access and use of land, including but not limited to owners of neighboring land.

An individual can belong to one or several communities described above and may be impacted positively or negatively, in a punctual or systemic manner, at short, medium and long term horizon.

#### Description of positive and negative impacts

The following table summarizes the material negative and positive impacts identified as a result of the double materiality assessment presented in disclosure requirement [ESRS 2 IRO-1] of the present chapter. The conclusion of the assessment highlighted a common pattern of the severity and the likelihood of the identified impacts; while the effect of the impact is severe as it may result in life changing injuries and/or in significant psychological harm, the likelihood of occurrence is low, as it has never happened, happened rarely within the Group or in exceptional circumstances.

The processes for engaging with affected communities about these impacts and the mitigation measures Imerys implements are respectively presented in disclosure requirements [ESRS S3-2] and [ESRS S3-3].

| ESRS S3. Affected communities | | | |
|---|---|---|---|
| Description of the IRO | Location within the value chain | Materiality | Time horizon |
| **Sub-topic > Communities' economic, social and cultural rights** | | | |
| **Community support and development** | Own operations (all activities) | Actual positive impact<br>Systemic | Short |
| IRO description<br>Group activities have positive impacts on local communities through local stakeholder engagement programs, community development initiatives and donations focused on education and skill development, environmental stewardship, social development, health, and culture.<br>Main affected communities<br>People living and/or working in the immediate vicinity of Imerys sites and remote communities who may benefit directly or indirectly from the programs, initiatives and donations<br>**Imerys commitments**<br>To contribute via donations and facilitate constructive local relationships, generate positive impacts by supporting the activities of local associations and help ensure that engagement actions are developed and rolled-out via partners who have local knowledge and expertise as well as a long term mandate. | | | |
| **Negative impacts on local communities** | Own operations (all activities) | Potential negative impact<br>Punctual | Short |
| IRO description<br>Group activities may have negative impacts on local communities in the event that it fails to adequately manage environmental or social topics, communicate effectively or remediate negative impacts.<br>Main affected communities<br>People living and/or working in the immediate vicinity of Imerys sites who may suffer from noise, traffic, visual pollution or other environmental or social aspects due to site activities.<br>**Imerys commitments**<br>To ensure that the Group minimizes its potential negative impacts on local communities, and in particular vulnerable populations, around its sites through the effective implementation of environmental, health and safety management systems, and through open and transparent dialogue. | | | |
| **Unfair access to land and resource rights** | Own operations (PM[1],RAC[2]) | Potential negative impact<br>Punctual | Long |
| IRO description<br>Group activities may have negative impacts on local communities in the event that it infringes on land rights and/or causes land access restrictions<br>Main affected communities<br>Communities directly or indirectly impacted by the access and use of land, including but not restrictive to owners of neighboring land.<br>**Imerys commitments**<br>As stated in the International Finance Corporation's (IFC) Performance Standard 5 on Land Acquisition and Involuntary Resettlement, Imerys commits to avoid involuntary resettlement, and when that is not possible, equitably compensate affected persons and improve the livelihoods and standards of living of displaced persons. If resettlement has occurred, the site monitors and evaluates its implementation and takes corrective actions until the provisions of resettlement action plans and/or livelihood restoration plans have been met. | | | |
| **Inappropriate security arrangements** | Own operations (all activities) | Potential negative impact<br>Systemic | Medium |
| IRO description<br>Group activities may have negative impacts on local communities in the event that security arrangement for employees and physical assets do not respect the human rights of local populations.<br>Main affected communities<br>People living and/or working in the immediate vicinity of Imerys sites.<br>**Imerys commitments**<br>In line with the Voluntary Principles on Security and Human Rights, Imerys commits to encourage respect for the human rights of individuals and communities by those who secure Group facilities. | | | |

1 PM refers to Performance Minerals as described in chapter 1 of the present report
2 RAC refers to Refractories, Abrasives and Construction as described in chapter 1 of the present report

| ESRS S3. Affected communities | | | |
|---|---|---|---|
| **Sub-topic > Communities' civil and political rights** | | | |
| **Deny of the civil and political rights** | ● Own operations (all activities) | ⊖ Potential negative impact<br>Systemic | ●●● Long |
| IRO description<br>Group activities may have negative impacts on local communities in the event that its practices deny the civil and political rights among local communities<br>Main affected communities<br>People living and/or working in the immediate vicinity of Imerys sites.<br>**Imerys commitments**<br>To ensure that the Group protects the civil and political rights among local communities | | | |
| **Sub-topic > Rights of indigenous peoples** | | | |
| **No respect of the rights of indigenous people** | ● Own operations (Extractive activities) | ⊖ Potential negative impact<br>Punctual | ●●● Long |
| IRO description<br>Group activities may have negative impacts on local communities in the event that it does not respect the rights of indigenous people and/or communities near its sites.<br>Main affected communities<br>Indigenous communities as stated by the ILO Convention No. 169, Article 1.<br>**Imerys commitments**<br>To ensure that the Group protects the rights of indigenous people communities near its sites. | | | |

## 1.3.3.3. Policies related to affected communities [S3-1]

As stated in the Imerys Code of Business Conduct & Ethics, Imerys is committed to act as a responsible corporate citizen worldwide. This includes respecting human rights, assuring the health and safety of all employees and of all those with whom the company works with and committing to the highest international standards of environmental protection and taking actions for sustainable development. These commitments are also enshrined in the Group Supplier ESG Standards.

This section describes the fundamental elements of Imerys' approach to all internationally recognized human rights relevant to affected communities and how the Group demonstrates its commitment in line with the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights (UNGPs), ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises and other international frameworks.

Imerys Group Chief Sustainability Officer is accountable for the implementation of these policies related to affected communities. For more information about the governance of sustainability matters, please refer to disclosure requirements [ESRS 2 GOV-1] of the present chapter.

### Policies related to local affected communities management

With the support of the Stakeholder Engagement policy, the Community Grievance Mechanism policy and the Donations policy, the Group actively encourages sites and employees to contribute to the socio-economic development of their respective local communities by not only identifying and understanding stakeholders' needs and expectations, but also by actively contributing talents and skills and supporting initiatives that create shared value. Working in a collaborative and constructive manner with local partners, affected communities, associations and other stakeholders helps the Group contribute to numerous Sustainable Development Goals through its operations.

## Free, Prior and Informed Consent (FPIC)

While very few Imerys operations are located in proximity to Indigenous people lands, Imerys respects indigenous people's rights, as set out in the United Nations Declaration on the Rights of Indigenous peoples and would respect the principles of Free, Prior and Informed Consent (FPIC) of indigenous peoples, providing culturally appropriate alternatives, and adequate compensation and benefits for projects that affect indigenous peoples' rights. The following rights of indigenous peoples are especially relevant:

- The right to self-determination, by virtue of which indigenous peoples freely determine their political status and pursue their economic, social and cultural development;
- Rights to property, culture, religion, and non-discrimination in relation to lands, territories and natural resources, including sacred places and objects;
- Rights to health and physical well-being in relation to a clean and healthy environment;
- Rights to set and pursue their own priorities for development;
- The right to make authoritative decisions about external projects or investments.

Key elements for consent of indigenous peoples have been recognized by international law since 1989, when the Conference of the International Labor Organization adopted Convention 169 on Indigenous and Tribal Peoples.

Imerys is committed to engage with potentially impacted communities, to address potential impacts related to Group operations, and to instill an open dialogue that supports the development of a positive and constructive relationships with affected indigenous peoples.

**01** **Case study**

Agreement between Imerys and the First Nations Atikamekw community of Wemotaci

In Canada, one of Imerys sites is located 55 km from the First Nations Atikamekw community of Wemotaci. In 2022, Imerys and the "Conseil des Atikamekw de Wemotaci" signed a Development Agreement that will be valid for the entire life of the mine. This framework outlines Imerys' long-term commitment to instill open, constructive dialogue and generate economic opportunities for the local community, not only through financial contribution to support development of a cultural heritage center but also through employment and local sourcing opportunities for community members.

## Security Arrangements

Imerys commits to respect human rights in its efforts to maintain the safety and security of its assets. The Group will not provide support[1] to public or private security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force.

In alignment with the Voluntary Principles on Security and Human Rights and the best practices expressed in the UN Basic Principles on the Use of Force and Firearms, Imerys requires that:

- security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force;
- if force is used it shall not exceed what is strictly necessary, and shall be proportionate to the threat and appropriate to the situation; and
- firearms shall only be used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury.

## Land rights

As stated in the International Finance Corporation's (IFC) Performance Standard 5 on Land Acquisition and Involuntary Resettlement[2], Imerys aims to avoid involuntary resettlement, and when that is not possible, equitably compensate affected persons and improve the livelihoods and standards of living of displaced persons. If resettlement has occurred, the site monitors and evaluates its implementation and takes corrective actions until the provisions of resettlement action plans and/or livelihood restoration plans have been met.

1 Support includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to non-state armed groups or public or private security forces; it does not include legally required forms of support, including legal taxes, fees, and/or royalties that companies pay to the government of a country in which they operate.

2 Resettlement is considered involuntary when people do not wish to move but do not have the legal right to refuse land acquisition that results in their displacement. According to the International Finance Corporation, "This occurs in cases of (i) lawful expropriation or temporary or permanent restrictions on land use and (ii) negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with seller fail."

### 1.3.3.4. Processes for engaging with affected communities about impacts [S3-2]

The Stakeholder Engagement policy, updated in 2023, includes identifying and understanding the various stakeholders connected to a site or a project including all affected communities.

The objectives are to:

- Gain insights into stakeholders interests, concerns and influence levels, helping in informed decision-making;
- Develop a Stakeholder Engagement Plan by creating tailored communication and engagement strategies for different stakeholder groups;
- Assist risk management by anticipating potential conflicts and enabling proactive mitigation measures;
- Support long-term engagement strategies by building transparent, positive and collaborative relationships.

In Step 1, the process involves identifying all stakeholders who are affected by or can impact Group activities. This identification is achieved through brainstorming sessions with relevant managers and expanding the list through networking. Important considerations include who benefits from the site's presence, who could be negatively impacted, and who has influence over the site's operations.

Step 2 involves analyzing the stakeholders to understand their influence and interest, classifying them as high, medium, or low in both categories. This analysis helps tailor engagement strategies by considering the stakeholders' support, concerns, and expectations.

In Step 3, a system is developed to ensure effective communication and response to stakeholders. Responsibilities are assigned for managing stakeholder interactions, and engagement forms (including the type and the frequency of engagement) are identified. Depending on the local context, engagement occurs with affected communities or their legitimate representatives directly, or with credible proxies that have insight into their situation.

Finally, Step 4 focuses on planning and monitoring the implementation of engagement activities. Objectives are defined and monitored using qualitative and quantitative indicators. To ensure that engagement happens, the Site Manager, who is the most senior employee with responsibility for day-to-day oversight of the site, is responsible for reviewing the Stakeholder Engagement Plan annually and validating it.

### 1.3.3.5. Processes to remediate negative impacts and channels for affected communities to raise concerns [S3-3]

Grievances can involve a wide spectrum of subjects, questions or issues and represent both minor preoccupations and much more serious conflicts. With the Community Grievance Mechanism policy updated in 2023, Imerys aims to address all grievances received, regardless of whether they stem from real or perceived issues, and whether the Complainant is named or anonymous.

Each Community Grievance Mechanism (CGM) established locally is used to report concerns and grievances. All grievances received by sites (whatever the access points used) are tracked and monitored in a Group IT reporting system. Sites are defining indicators to ensure the effectiveness of their Community Grievance Mechanism and are seeking feedback from complainants on their level of satisfaction with the grievance mechanisms.

The Group is committed to protecting the identity of the Complainant and to handling personal information in accordance with legal requirements. This duty extends to all employees or representatives of the Group or its contractors who participate in the grievance mechanism. The processing and retention of personal data in connection with a grievance shall be made in compliance with the EU General Data Protection Regulation (GDPR). This means in particular ensuring that in application of the Group's Data Privacy Policy. Retaliation against a Complainant to undermine the Community Grievance Mechanisms is not tolerated by Imerys.

These Community Grievances Mechanisms are open to all external stakeholders who consider themselves affected by Imerys' activities. There are no restrictions on the type of grievances a stakeholder can raise under these Mechanisms. However, the Group has also established a whistleblowing system called "Speak up!" described in disclosure requirement [ESRS G1-1] section 1.4.1.3 of the present chapter, which provides multiple ways for the external stakeholders who are aware of circumstances they believe to represent violations of Imerys' Code of Business Conduct and Ethics or legal requirements to directly report them via a dedicated platform.

### 1.3.3.6. Taking action on material impacts on affected communities [S3-4]

Contributions to local communities via donations are common practice in the business world as they can facilitate constructive local relationships, generate positive impacts by supporting the activities of local associations and help ensure that engagement actions are developed and rolled-out via partners who have local knowledge and expertise as well as a long term mandate. The Group's Donations process ensures that the Group's approach to donations is aligned with the Group's Code of Business Ethics and Conduct and also that appropriate analysis, reporting, accounting and approvals to avoid the risks of improper conduct are in place.

Through its community engagement efforts, Imerys' priority is to support education within neighboring communities, promote equal opportunities and focus its actions towards young adults, women and girls, and people in socially fragile situations in the areas surrounding the Group operations.

In 2024, Imerys donations represented more than €871 thousand, in 21 countries.

**02** Case study

While engagement efforts across the world vary considerably and are adapted to each local context, each year Imerys recognizes particular projects through the SD Challenge to promote best practices across the Group.

In 2024, the winner of the SD Challenge in the category "Community engagement" was the Educalab project in Brazil. This project aims operating in a vulnerable region social center located 800 meters from the Group's plant near São Paolo, called V Estação, providing vocational training courses for teenagers and young people. The purpose is to provide better quality and technical education to teenagers and young people who are looking for a job opportunity. Young people in the community are usually leaving high school without any training, making the entry into the job market difficult, especially in an area of great social vulnerability.

#### Fonds Dan Germiquet

Imerys has likewise supported Fonds Dan Germiquet since its creation. The Dan Germiquet Fund provides merit-based scholarships to international students who have chosen to integrate École Nationale Supérieure de Géologie de Nancy (ENSG). The Dan Germiquet Fund was established ten years ago to honor the memory of Dan Germiquet, who was for many years Imerys' Vice President for Geology and Mine Planning. Education was dear to Dan Germiquet's heart and he was closely involved with the life of the National School of Geology and its students. Since 2014, 71 students have graduated thanks to the scholarship provided by the Dan Germiquet Fund. By financing international students to obtain their diplomas from the National School of Geology, the Fund also provides a valuable springboard for long and fruitful careers. Engineers who graduate from the school are highly employable scientific experts who often move to leading positions in the mining sector. The intellectual skills acquired at the school, including handling complex data and uncertainty, also equip students for a range of other careers in industry, management, and research. In December 2022, the Group signed a five-year agreement as a founding member of the newly created Geol Nancy Foundation. This new Foundation will host Imerys' long-term commitment to the Dan Germiquet Fund.

#### Employee volunteering program

Imerys employees have an important role to play in supporting the communities where they live. In 2024, the Group launched Spark, an employee volunteering program specially designed for those who want to help have a positive impact in their communities through the donation of their time. Thanks to partnerships with associations, 2 working days are given to employees to carry out a wide range of volunteering activities with local communities. In September 2024, a pilot employee volunteering program was launched in 5 countries (France, the United Kingdom, Singapore, Switzerland and the United States), representing 2,500 employees in the first phase.

#### EMILI Public Debate

In October 2022, Imerys announced the intention to develop a lithium mining project at its Beauvoir site in Echassières (Allier), France. The EMILI project (Exploitation de MIca Lithinifère par Imerys) is designed to address the dual challenge of the energy transition and economic sovereignty. Due to the nature of the project and the amount of investment envisaged, the French authority called the "Commission nationale du débat public" (CNDP) organized a nation-wide debate on the project. The public debate for the EMILI project began in March 2024 and ended in July 2024. It was open to all citizens across France and covered not only what the project entails, but also why the project is proposed, and what its impacts, both positive and negative may be. In total 43 public events were held, including 13 public meetings, 2 site visits and 17 workshops. A total of 3628 participants attended the public debate events and 3463 contributions in the form of opinion, comments, questions and messages were shared with the CNDP during the course of the debate.

### 1.3.3.7. Target related to community engagement [S3-5]

Imerys has defined pilot sites from amongst its global operations to focus particular efforts on local stakeholder engagement. The pilot sites were defined based on the five criteria, including financial, grievance, media, permitting and operational indicators. These indicators were selected as proxies for the potential impacts as well as sensitivity that may exist amongst local communities in the immediate areas surrounding Imerys operations. The pilot list will be refined and updated as appropriate as additional information is received through local community forums and or the grievance mechanisms.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Improve stakeholder engagement by ensuring pilot sites identify and assess potential impacts on local stakeholders as per Group requirements. | 2024<br>74% | **NEW** | 2025<br>100% |

#### Metrics related to community engagement

Imerys continues to enhance its understanding of its stakeholders' needs and expectations. In 2023, the Stakeholder Engagement policy was updated, and specific trainings were organized to help sites develop their stakeholder mapping. This is reflected in the increase of the percentage of sites having a stakeholder mapping in 2024.

| Metrics related to community engagement | Unit | 2024 | 2023 |
|---|---|---|---|
| Sites with a stakeholder mapping | % | 58% | 57% |
| *Of which priority sites (NEW)* | *%* | *74%* | - |
| Sites with a community grievance mechanism (NEW) | % | 48% | - |
| Donations (NEW) | € thousands | 871 | - |
| *Number of countries benefiting of these donations(NEW)* | *#* | *21* | - |
| Employees included in the volunteering pilot program (NEW) | # | 2,500 | - |
| Severe human rights issues and incidents connected to affected communities (NEW) | # | 0 | - |

## 1.3.4. Sustainable solutions for consumers and end-users [ESRS S4]

As a leading Business-to-Business provider of specialty minerals, the Group maintains an indirect connection to final end-users. While Imerys does not interact directly with consumers, its products serve as essential components in numerous everyday consumer goods and industrial applications. The Group's influence on end-user experiences is manifested through product integration, performance enhancement, and sustainability initiatives. Imerys actively collaborates with manufacturers to develop innovative solutions that benefit end-users, conducts comprehensive market research to anticipate consumer trends, and ensures stringent regulatory compliance to safeguard consumer interests. The extent of the Group's connection with end-users varies across its diverse product portfolio and applications, but it is predominantly indirect and facilitated through Imerys' direct customers in the manufacturing sector.

### 1.3.4.1. Impact, risk and opportunities [SBM-3]

The impacts, risks, and opportunities outlined in the following sections were identified through a comprehensive double materiality assessment, as detailed in disclosure requirement [ESRS 2 IRO-1] of this chapter. The assessment did not reveal any material impacts on people or the environment, however, it highlighted a specific risk and an opportunity pertaining to consumers and end-users.

| ESRS S4. Consumers and end-users | | | |
|---|---|---|---|
| Materiality | Location within the value chain | Description of the IRO | Time horizon |
| **Sustainable PORTFOLIO** | | | |
| Imerys commitment | | | |
| Imerys is committed to providing high-quality products to its customers and, indirectly, to end-users, through sound, responsible and sustainable product management. By identifying and understanding the implications and opportunities linked to the global market trends presented in Chapter 1, section 1.1 of the Universal Registration Document, the Group is able to maximize the positive impacts linked to its business and satisfy current and future market and customer needs. The Group's commitment to sustainable portfolio management is a mean to contribute to SDG 12 to ensure sustainable consumption and production patterns and to SDG 13 to take urgent action to combat climate change and its impacts. | | | |
| **O** Opportunity | → Downstream value chain | **Natural Solutions for Consumer Goods: the Group's development strategy aims to grow it annual revenue in activities related to natural solutions for consumer goods** | ●●● Long |
| **Inadequate safety of consumers and/or end-users** | | | |
| Imerys commitment | | | |
| Imerys is committed to ensuring the safety of its products for human health and environment through the compliance with all relevant regulations in the countries where they are sold. This commitment involves comprehensive regulatory monitoring, rigorous product testing and certification, strict supply chain management, detailed documentation and traceability processes. | | | |
| **R** Risk | → Downstream value chain | The Group may be exposed to financial risks related to fines, lawsuits, reputational damage, product recalls, potential market value decline and/or increasingly stringent regulations limiting product sales in particular markets. | ●○○ Short |

### 1.3.4.2. Policies related to consumers and end-users [S4-1]

The Executive Committee of the Imerys group has established the Product Stewardship Governance Committee to assist the Executive Committee in ensuring the Group's Product Stewardship program is effectively deployed to maintain product-related compliance, and minimize exposure to risk and reputational damage, in the markets in which Imerys operates. The Product Stewardship Governance Committee is chaired by the CEO and composed of the Group Product Stewardship Vice-President, the Group General Counsel, the Chief Sustainability Officer, the Group Industrial Health & Safety Vice-President. They meet at least three times per year and monitor the Group's progress on all Product Stewardship objectives and programs.

The Group's Priority Chemical policy aims to minimize the health and safety impacts on its workers and its products to downstream users by first and foremost, where possible avoiding and or restricting their use. This policy applies to all purchased raw materials, intermediates, products (produced or purchased) and development samples. Priority chemicals encompass substances suspected to have irreversible effects on human health or the environment, and classified as Carcinogen, Mutagen, Reprotoxic (CMR) categories 1A, 1B and 2, Persistent, Bioaccumulative & Toxic (PBT), very Persistent & very Toxic (vPvB) and Persistent Organic Pollutants (POP) by the Globally Harmonized System (GHS).

The Material Safety Data Sheet (SDS) Authoring policy aims to ensure the conformity of Imerys SDS to applicable regulatory requirements and accepted industry standards. A product's SDS lists information relating to hazardous substances it contains and provides guidance and advice on the safe handling, storage and transportation of Imerys products. At the end of 2023, all of the Group's SDS were revised and harmonized to make the document more legible for customers.

In 2023, Imerys established dedicated policies for consumer goods markets. The purpose of these policies is to clearly set out the compliance obligations and best practices that are required in these markets, in the targeted countries. These policies apply globally to all regulated human food additives, cosmetics and personal care markets in which the Group operates or plans to operate.

### 1.3.4.3. Action to managing material risks [S4-4]

The overarching goal of Imerys' portfolio management is to identify and minimize the health, safety, environmental, and social impacts of all Group products throughout their lifecycle, while maximizing their economic benefits and positive impacts to customers and their end consumers. This commitment is assured by a robust product stewardship program and the assessment of the product portfolio against sustainability criteria.

#### A science-based approach

The Group employs state-of-the-art analytical methods, equipment and testing to ensure that product regulatory assessments and associated decisions are driven by sound science. The Group continually evaluates testing policies and invests in innovation in health, safety, and sustainability across product ranges, locations, and production processes to ensure continuous improvement. These measures enable the Group to produce high-quality products, meet customers' expectations and operate in a stringent, dynamic regulatory environment.

#### Tailor-maid transition plans dedicated to Priority Chemicals

Imerys does not intentionally manufacture products using chemical substances that meet the criteria to be classified as Priority Chemicals. However, when chemicals in current use fall under the definition of this policy, the Group develops a transition plan to eliminate, substitute, reduce such chemicals in impacted products, or to discontinue the impacted product or raw material. This transition plan requires approval by the Product Stewardship Governance Committee and is routinely reviewed through to completion.

#### Stringent criteria applied to food additives, cosmetics and personal care applications

In food additives, cosmetics and personal care applications, only products internally approved as compliant may be intentionally sold into the pertaining markets in the approved listed geographies. Products may be approved internally only if they meet the food additives, cosmetics and personal care regulatory requirements for that geography, supported by an auditable documentation confirming compliance.

#### The M4 program

For certain minerals, the Group applies the Mine to Market Mineral Management (M4) program, both for owned and external deposits. Owned deposits are those the Group operates itself. These deposits are thoroughly vetted for geological properties and apply careful mine planning. The Group may also source from a select number of high-quality external deposits. During the vetting stage, thorough preliminary testing is conducted to ensure the site meets M4 program standards. Thorough ongoing testing is then conducted before any material from these sites is accepted and materials that do not meet quality standards at any point are rejected.

## 1.3.4.4. Action to pursuing material opportunities [S4-4]

Imerys is committed to developing materials and expertise to deliver relevant and innovative market-driven solutions to support the growth of the Group while at the same time delivering sustainable solutions to society. Capacity to quantify the environmental and social impacts and steer the Group's product portfolio to ensure long-term product sustainability is a key theme within the Group SustainAgility program.

### SustainAgility Solution Assessment (SSA) Framework

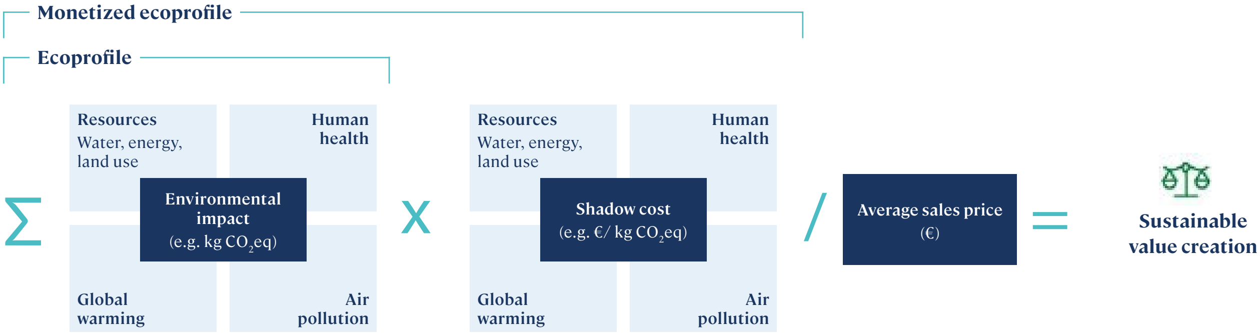
#### Assessment methodology

In 2018, Imerys launched its SustainAgility Solutions Assessment framework, which has been designed in line with the World Business Council for Sustainable Development (WBCSD [1]) guidelines for Portfolio Sustainability Assessments (PSA [2]), so as to objectively measure the sustainability of Imerys products and identify their environmental and social impacts. The SustainAgility Solutions Assessment (SSA) framework provides a systematic, high quality, scientifically robust and transparent approach to review products and services based on several criteria, ultimately scored on two factors:

- Sustainable Value Creation: the balance between the economic value created and the environmental impact
- Market Alignment: the level of sustainability-related benefits or challenges (based on an evaluation of public data and thorough review by key stakeholders).

#### Methodology – LCA & Sustainable value creation

Sustainable value creation formula is based on monetized ecoprofile = "cost for the planet"



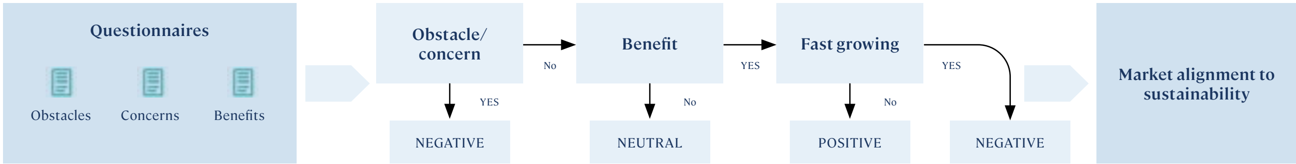

Within the SustainAgility Solutions Assessment framework, Sustainable Value Creation is based on the quantification of the products' environmental footprints or eco-profiles from "cradle-to-gate", using a Life Cycle Assessment (LCA) methodology following the requirements of ISO 14040:2006 & ISO 14044:2006[3] , as well as a dedicated LCA software and LCA public databases such as Ecoinvent.

Imerys manages its own product database, which is continuously updated to include the most recent industrial or innovative information. Since 2022, Imerys has joined ScoreLCA[4] to participate in the future development of Life Cycle Assessment practice thanks to a collaboration between industrial, institutional and scientific actors.

1 The WBCSD is a global, CEO-led organization of over 200 leading businesses working together to accelerate the transition to a sustainable world by making more sustainable businesses more successful.
2 Portfolio Sustainability Assessments (PSA) is a methodological framework to proactively steer product portfolios towards improved sustainability outcomes https://www.wbcsd.org/Programs/Circular-Economy/Resources/Portfolio-Sustainability-Assessment-v2.0.
3 ISO 14040: 2006 describes the principles and framework for life cycle assessment and ISO 14044: 2006 specifies requirements and provides guidelines for life cycle assessment.
4 SCORELCA is a French association that aims to promote a positive, shared and recognized evolution of global environmental quantification methods at the European and international level, in particular of life cycle assessment (LCA). https://scorelca.org.

**Methodology – Market alignment**

Market alignment assessment involves detecting the market signals, thanks to either an evaluation of publicly available information or discussions with key stakeholders (legislation, customers' needs, ecolabel requirement)




As part of the Market Alignment Assessment, the impacts of Imerys actions to help the downstream value chain manage risks and create opportunities to improve sustainability performance are assessed. These impacts are reflected in the final SSA score of the product in the targeted application.

Each Product in Application Combinations (PAC) undergoes a comprehensive update every five years, encompassing both LCA and market alignment evaluations.

### An extended framework to Capex and M&A

All new product development, material Capex and M&A projects are systematically assessed according to the SustainAgility Solutions Assessment framework, using a shortlist of indicators. Future developments are compared to existing or reference products, and screening assessment results are fully integrated in Imerys' innovation process as a criterion for decision-making and stage gate pass. This means that progressively, projects which do not fulfill minimum sustainability criteria will have to be improved before moving to the next steps of development. This screening tool also includes the effectiveness of Imerys' actions on the downstream value chain by measuring to what extent risks are reduced and opportunities pursued thanks to the new development project.

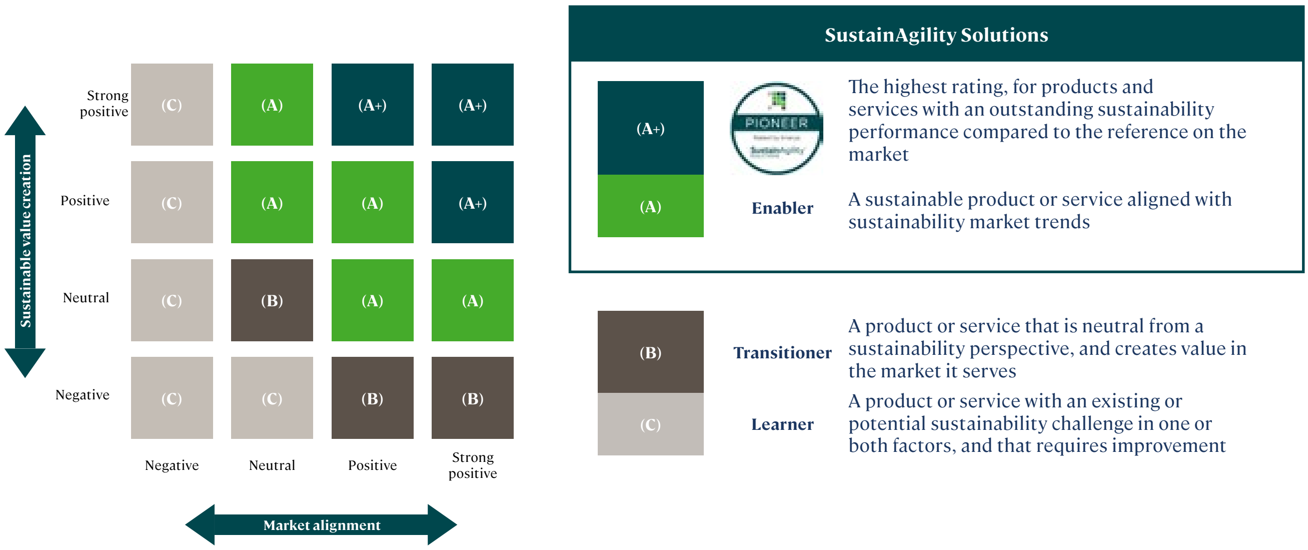
### Governance

SustainAgility Solution Assessments and Product Life Cycle Assessment are overseen by the Group's Climate and Portfolio Sustainability VP and managed by a dedicated team, both at Corporate level and in the different Business Areas, with direct links to all other functions (marketing, operations, product stewardship, science & technology, etc.). Imerys dedicated SSA team is composed of LCA specialists, with a specific expertise on mineral processing, needed to perform impact assessment calculation, conduct in-depth analysis of results, assess new products profiles at the earliest stages of development and prepare data to be shared with customers.

## Sustainable portfolio classification

### Portfolio mapping

For both the Sustainable Value Creation and the Market Alignment assessments, each PAC is given a rating, ranging from A+, indicating a PAC that demonstrates an extremely positive result or strong sustainability-related benefits, to C, indicating a PAC that requires improvement or presents sustainability-related risks. The ratings of both the Sustainable Value Creation and the Market Alignment assessments are combined and used to determine the final scoring of a specific Product in Application Combination within the four categories below:



### SustainAgility Solutions: Pioneer Certificate

The Group aims to help drive sustainable innovation in the specialty minerals industry, pushing the boundaries of Group products to meet customers' needs while offering sustainable solutions that meet global environmental and social challenges. The Pioneer certificate, introduced in 2021, facilitates the identification of sustainable solutions and highlights material opportunities for Imerys' customers and stakeholders. It aims to provide quantitative and qualitative information about the environmental and social footprint of solutions with outstanding sustainability performance, giving customers a clear basis to consider such criteria in their purchasing decisions.

Whether it's supporting carbon-free mobile energy or sustainable construction, developing alternative packaging or more sustainable food production, or designing longer-lasting solutions to reduce materials consumption across a range of industries, the Group is continually advancing its product portfolio and assessing it against sustainability criteria to adapt to changing customer needs.

**01** **Case study**

Winner of the 2024 SD Challenge

The C-NERGY® L-Series synthetic graphite powders, developed and industrialized by Imerys, have emerged as the winner of the product sustainability category. This product, designed for Li-Ion batteries and fuel cell applications, boasts a significantly lower $CO_2$ footprint—at least 50% lower than that of competitor graphite powders. With a carbon footprint of just 1,500 gCO2 per kilogram, these

### Conduct eco-profile evaluation of Imerys portfolio

All Imerys products — **2025**

*Expected outcome*

- **Regular estimation of the environmental footprints from "cradle-to-gate" of the full range of Imerys mineral and product families. Results are used to identify impact reduction levers, monitor progress, ecodesign new products and share reliable data for customers.**

*Results at end 2024*

**320**

product eco-profiles have been completed since 2018, covering the full range of Imerys mineral and product families, including Kaolin, Refractory minerals, Talc, Perlite, Diatomaceous Earth, Mica, Carbonate, Wollastonite, Bentonite, Calcium aluminates, Graphite and Carbon Black.

### Monitor the number of Product sustainability initiatives submitted in the SD Challenge

All Imerys sites — **2024**

*Results at end 2024*

**16**

Initiatives related to product sustainability were submitted as part of the SD Challenge 2024

### Raise awareness regarding product sustainability

Target audience: S&T managers — **2024**

Results at end 2024

**7**

webinars were organized to train the Science & Technology (S&T) teams on product sustainability related topics.

### 1.3.4.5. Targets related to product sustainability [S4-5]

The mid-term target is to assess Imerys' Product in Application Combinations (PACs) against sustainability criteria, covering at least 75% of Imerys' product portfolio (by revenue), and to ensure at least 75% of Group New Product Developments are scored as "SustainAgility Solutions" by the end of 2025.

| Group Objective | Baseline | Performance 2024 | Target |
|---|---|---|---|
| Assess the Products in Application Combinations (PAC) of Imerys product portfolio (by revenue) according to sustainability criteria | 2022<br>55% | 71% | 2025<br>75% |
| Ensure the Group New Product Developments are scored as SustainAgility Solutions | 2022<br>75% | 86% | 2025<br>75% |

As of the end of 2024, 71% of the Group portfolio by revenue was assessed, which represents 514 Product in Application Combinations (PACs). Within the innovation portfolio, 86% of the projects launched in 2024 have been rated as SustainAgility Solutions, in the two highest categories ranked A+ and A. As such, both mid-term targets for 2025 are well on track.

Based on the results of the deployment of the SSA methodology, Imerys is able to categorize a portion of its portfolio based on sustainability criteria. The main findings of the 2024 mapping, based on 71% of the Group portfolio by revenue, show that 42% of the PACs that have been assessed are rated as SustainAgility Solutions. As this is a partial assessment of the Group's portfolio, the revenue breakdown will evolve over time as additional PACs are assessed. The revenue within each category will also evolve following methodology updates put in place to foster continuous improvement.

| Revenue by SSA Matrix Categories | Unit | 2024 | 2023 |
|---|---|---|---|
| SustainAgility Solutions – Pioneer | € million | 172 | 152 |
| SustainAgility Solutions – Enabler | € million | 1,351 | 1,320 |
| Transitioner | € million | 490 | 512 |
| Learner | € million | 555 | 493 |
| Not yet evaluated | € million | 1,038 | 1,317 |
| **Percentage of Revenue by SSA Matrix Categories** | | | |
| SustainAgility Solutions – Pioneer | % | 5% | 4% |
| SustainAgility Solutions – Enabler | % | 37% | 35% |
| Transitioner | % | 14% | 13% |
| Learner | % | 15% | 13% |
| Not yet evaluated | % | 29% | 35% |

vvvvtv"Growing with our customers" is one of the three axes of the SustainAgility program. It means behaving ethically, operating fairly, ensuring responsible purchasing, and advancing sustainable products and processes. By aligning its growth strategy with customer needs and maintaining unwavering ethical standards, Imerys positions itself as a trusted partner in sustainable innovation and responsible business practices.

While the [ESRS S2] and the following section describes how Imerys embodies business conduct into everything its does in accordance with the [ESRS G1], the [ESRS S4] above presents the screening of Imerys products against environmental and social criteria to adapt its portfolio and meet changing customer needs.

## 1.4.1. Business conduct [ESRS G1]

Ethical business conduct is the foundation upon which Imerys' business is built. At its core, Imerys is Unlocking Better Futures together with stakeholders through ethical behavior and fair operating practices and by ensuring the Group collaborates with responsible value chain partners. This solid foundation is also a guarantee and a source of confidence for Group employees, customers and society at large, as exemplary conduct is proof of reliability and long-term sustainability. In addition to all the other SDGs referred to in this chapter, Imerys' commitment to responsible business conduct contributes to SDG 16 to promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.

### 1.4.1.1. Governance related to business conduct [GOV-1]

Imerys is committed to sound corporate governance as a means to ensure the Group continually improves its functioning and management, in an atmosphere of transparency, duly respecting the expectations of investors and other stakeholders. Regular dialogue between the Chief Executive Officer, the Executive Committee and the Board of Directors plays a decisive role in defining and implementing the Group's strategy, including with regards to the Group's sustainability ambition. Imerys follows the recommendations of the AFEP-MEDEF Corporate Governance Code applicable to French-listed companies.

*For more information regarding Corporate Governance, see chapter 4 of the Universal Registration Document.*

The Group has a dedicated Ethics Committee to assist the Executive Committee in ensuring the Group's operations are conducted ethically, in particular in accordance with regulations on antibribery, antitrust, Duty of Care, international sanctions, personal data protection and the protection of whistleblowers regulations. The Ethics Committee is chaired by the Group General Counsel and Group Secretary and is composed of Executive Committee members and Senior Managers of the Group. It meets regularly (at least twice a year). In 2024, the Ethics Committee met four times.

The Ethics Committee is accountable for setting out ethics-related priorities and for promoting an ethical corporate culture. It establishes and monitors the achievement of the ethics & compliance roadmap. It is accountable for ensuring the adequacy of ethics-related codes, policies and procedures, starting with the Imerys Code of Business Conduct & Ethics. It ensures the effective dissemination, training and implementation of all ethics-related codes, policies and procedures. It monitors training plans and other awareness-raising measures, and ensures sufficient human and financial resources are available to efficiently implement the program.

The Ethics Committee is also responsible for monitoring the Group whistleblowing and case investigation system "Speak Up!". In this respect, it ensures adequacy of the system and monitors ethics-related misconduct reported either via the whistleblowing system or other channels.

The Ethics committee reports on an annual basis to the Board of Directors' Audit Committee, which reviews the effectiveness of the Group ethics and compliance programs, including the whistleblowing system, and reports to the Board of Directors. The Chair of the Ethics Committee also regularly informs the Executive Committee of the performance and effectiveness of Group ethics and compliance programs.

The Antitrust & Compliance General Counsel, who reports to the Group General Counsel & Company Secretary, is responsible for defining and implementing the ethics and compliance roadmap and for the design and monitoring of Group compliance programs.

The Chair of the Ethics Committee is the Group General Counsel and its Secretary is the Antitrust & Compliance General Counsel ensuring that the Committee has an appropriate level of expertise over legal, compliance and business conduct matters. Its members have been selected to ensure expertise over the different pillars of Imerys compliance programs and experience of Imerys' activities.

*For more information on board members' expertise in relation to business conduct matters, please refer to the disclosure requirement [ ESRS 2 GOV-1], paragraph «Board members sustainability competencies and training».*

### 1.4.1.2. Process to identify impact, risk and opportunity related to business conduct [IRO-1]

#### Materiality assessment of business conduct matters

As explained in disclosure requirement [ESRS 2 IRO-1] of the present chapter, the double materiality assessment carried out by Imerys in 2024 covered the following business conduct sustainability matters: corporate culture, protection of whistleblowers, political engagement, management of relationships with suppliers including payment practices, and corruption and bribery. As a result of the double materiality assessment, business conduct matters are considered by Imerys as material, except corporate culture (refer to disclosure requirement [ESRS 2 SBM-3]).

| ESRS G1. Business Conduct | | | |
|---|---|---|---|
| Materiality | Location within the value chain | Description of the IRO | Time horizon |
| **Sub-topic: Inadequate whistleblowers protection** | | | |
| Potential negative impact | Own operations(all activities) | Group activities may have negative impacts on employees or other stakeholders in the event that its internal reporting channels and or protection of whistleblowers are not adequate or effective. | Long |
| **Sub-topic: Opaque political and lobbying activities** | | | |
| Potential negative impact | Own operations(all activities) | Group activities may have negative impacts on external stakeholders in the event that it undertakes lobbying activities or exerts political influence in an opaque manner. | Long |
| **Sub-topic: Unfair management of suppliers (including payments practices)** | | | |
| Actual negative impact | ← Upstream value chain | Group activities have negative impacts on suppliers (especially SMEs) in the event it does not treat suppliers fairly, in particular with respect to payments practices. | Short |
| **Sub-topic: Corruption and Bribery** | | | |
| Potential negative impact | Own operations(all activities) | **Ineffective antibribery compliance program: Group activities may have negative impacts on multiple stakeholders in the event that its management system to prevent, detect, investigate and address incidents of corruption and bribery is ineffective.** | Long |

#### Bribery risk mapping process

As part of its antibribery program, the Group carries out a regular risk mapping exercise to identify, analyze and prioritize the risks of the Group's exposure to bribery based in particular on the business sectors and geographical areas in which the Group operates in compliance with the French Sapin II Law[1]. The aim is to inform top management and provide the Ethics Committee with a clear vision of bribery risks and to ensure that the antibribery compliance program is adapted to the risks identified.

The Group has identified a list of bribery risk scenarios for each main function and a list of relevant means of bribery. These lists are reviewed at each risk map update to confirm their relevance and description. During the 2023 risk map update, the relevance of the 25 bribery risk scenarios and the 11 means of bribery was confirmed. They were also reviewed and validated centrally by the Compliance and Internal Audit and Control functions.

The Group uses a "workshop technique" to assess the inherent impact and probability of each bribery risk scenario and to assess the mitigation effectiveness of each means of bribery. The workshops are organized by regions (Asia-Pacific, Europe 1 (European countries with CPI > 50), Europe 2 (European countries with CPI < 50), Middle East & Africa, North America, and South America) and bring together representatives of all the regions' countries where Imerys has operations, business areas, functions and different levels of the hierarchy. A cycle of update by region enables the Group to update the risk map for all the geographical areas where the Group operates.

As a result, a risk map is drawn up identifying and hierarchizing bribery risk scenarios globally and for each country, by taking into account country-related factors (notably the country's economic weight based on Imerys' sales and sensitivity based on the country's Corruption Perception Index issued by Transparency International). The level of effectiveness of Imerys' mitigation measures in relation to each means of bribery is updated based on the votes and qualitative information gathered during the workshops, as well as the central assessment performed by the Compliance and Internal Audit and Control functions (considering the results of internal audit assignments and potential recent bribery cases). The risk map is compared with the previous update to assess the progress made and decide on an action plan, including a training plan. As the cornerstone of the Group's antibribery compliance program, the risk map is validated by the Ethics Committee. It is updated every two years, unless a triggering event occurs. The last update was finalized in December 2023.

1 Law no. 2016-1691 of December 9, 2016 relating to transparency, the fight against corruption and the modernization of economic life

## 1.4.1.3. Corporate culture and business conduct policies [G1-1]

Imerys is committed to exemplary business conduct, ensuring ethical behavior and fair operating practices across all Group activities. In the spirit of continuous improvement, Imerys assesses its sustainability policies, actions and results annually through a comprehensive EcoVadis[1] sustainability assessment, sharing these results openly with internal and external stakeholders. Imerys has been assessed annually by EcoVadis since 2014. The mid-term target is to improve the external sustainability rating of the Group compared to the 2022 assessment by 7% by the end of 2025. At the end of 2023, the Group's EcoVadis assessment results were 73 out of 100, placing Imerys in the 94th percentile of all companies assessed.

### Fostering corporate culture via the Group Code of Business Conduct and Ethics

Imerys establishes and fosters its corporate culture through its Code of Business Conduct and Ethics and the Imerys Purpose, Vision and Values (see Chapter 1 of the Universal Registration Document). The Imerys Code of Business Conduct and Ethics (the Code) summarizes the principles of ethical behavior the Group expects from all of its employees, suppliers, and other partners. It also embeds Imerys' Purpose, Vision and Values. The umbrella principles set forth in the Code are supported by a series of policies and procedures applying to both the general conduct of Imerys and the individual conduct of each employee. The subjects covered by the Code include, but are not limited to, compliance with laws and regulations, protection of the environment and human rights, relations with local communities and trade unions, health and safety, diversity, equity and inclusion, confidentiality, prevention of fraud, corruption, insider trading, and conflicts of interest, lobbying activities, non retaliation for good faith reporting, protection of the Group's assets, fair competition, transparency, and integrity.

The Code is based on best practices recognized internationally. These include the guidance and principles from the following leading global agreements, among others:

- The United Nations Global Compact (UN GC)
- The United Nations Sustainable Development Goals (UN SDG)
- The United Nations Guiding Principles on Business and Human Rights
- The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- The OECD Due Diligence Guidelines for Meaningful Stakeholder Engagement in the Extractive Sector
- The International Labor Organization (ILO) Fundamental Conventions
- The French Business Climate Pledge
- The act4nature Business Commitments for Biodiversity

The Code is a "living document", reviewed and updated annually, under the supervision of the Ethics Committee, in order to take into account internal and external changes and developments in applicable regulations.

Promotion of the Code and Imerys' corporate culture is done both internally and externally. The Code, introduced by the Group CEO, and translated into 21 languages, applies to all Imerys employees, Imerys controlled joint ventures, and partners with whom Imerys does business. It is made available to external stakeholders on the Imerys website and Imerys requires its contracting parties to abide by it. All Imerys employees can access it either on sites or on the Group intranet and they receive regular communication and training (see below). Imerys evaluates adherence with the Code, Imerys corporate culture and values by monitoring training completion and conducting ad hoc employee surveys, such as "Your Voice".

### Business conduct and ethics related policies & compliance programs

The Group works continuously to strengthen its programs related to ethics and compliance. The purpose of these programs is to identify risks, implement preventive measures and detect non-compliance with local and international rules and regulations related to the fight against bribery and anti-competitive behaviors, the respect of international sanctions and embargoes, the protection of personal data, and the respect of human rights, health, safety and the environment in Group operations around the world as well as within the Group's upstream value chain (Duty of Care).

The Group's compliance programs are supported by numerous policies and procedures linked with the Code, including but not limited to, the Group's antibribery, antitrust, Duty of Care, international sanctions, personal data protection and whistleblowing policies and related procedures. All these policies and procedures clearly outline the process, reporting and necessary levels of control to ensure compliance.

The policies with respect to 'business conduct matters', within the meaning of the CSRD, notably policies on whistleblowing, antibribery and relationships with suppliers, are further detailed in this section.

*For more information on Imerys' Vigilance Plan, see Part II of the present chapter.*

1 EcoVadis is a recognized leader used across industries to assess sustainability performance based on four pillars: environment, labor and human rights, ethics and sustainable procurement

### Alert system and protection of whistleblowers

Enabling stakeholders, both internal and external, to safely voice concerns and having the infrastructure and support in place to hear and deal with those concerns is a cornerstone of good governance and is the core of Imerys' Code. The Group's "Speak up!" system enables reporting via internal channels, via the employee's manager, human resources, or other functions, or directly via a dedicated digital platform at www.speak-up.imerys.com. The Group's digital alert system, operated by an independent qualified third party and open to all employees and external parties, can be used to report any suspected violations of the Group Code. Reports can be made either by telephone or via the Speak up! web platform. Both telephone and web platform reporting are available in main Imerys languages 24 hours per day, seven days per week.

Based on the facts presented in preliminary reports, the Group assigns an investigative team of trained and experienced in-house professionals in the relevant fields to conduct the investigation, supported by external experts where appropriate. The investigative team collects and reviews documents, conducts interviews, and performs any other tasks necessary to reach a conclusion about the allegations in the report. Imerys encourages its employees and stakeholders to share any information believed to represent a violation of the Code.

The fundamental elements of Imerys' alert system and the measures to protect whistleblowers are defined in the Group Whistleblowing Policy. This policy explains the alert system's governance (who establishes, manages and supervises the system), its main operational steps (how to report alleged violations or questionable conduct and how Imerys responds to a report) and its core principles to ensure confidentiality and protection of whistleblowers. Accordingly, Imerys and its employees shall take no action in retaliation against any person for making a good-faith report or participating in an investigation under the alert system policy. The policy covers all geographies where the Group operates, all its activities and all violations or possible violations the Group Code, policies and procedures or applicable laws and regulations. Communication and awareness-raising campaigns on the Speak up! system are conducted within the Group and information is accessible externally on the Group website. The Ethics Committee is responsible for the alert system and establishes a periodic assessment of all reported cases in its Annual Report, which is presented to the Audit Committee.

### Communication and training on the Group Code and business conduct matters

Awareness and training are essential to effectively embed business ethics in employees' day-to-day activities. To ensure awareness of employees at all Group sites, a printed copy of the Code is available and posters promoting the Speak Up! alert system are displayed at all sites. In addition, awareness of the Code is raised during the annual Imerys Connect Day, bringing all employees across industrial sites, laboratories and offices together. Regular newsletters and articles are also published on the Imerys intranet addressing specific business conduct matters.

The onboarding program for new hires includes mandatory ethics and compliance training modules, covering the Code of Business Conduct and Ethics, antibribery, personal data protection for all employees and antitrust for at-risk populations.

All new and updated ethics and compliance policies and procedures are accompanied by communication and training campaigns, designed to target the most-at-risk populations.

Every year, the Group deploys a mandatory refresher training campaign on the Code for all connected employees, who are asked to commit to the principles set out in the Code and trained on the alert system. The 2024 refresher campaign was launched in October. In addition, mandatory training campaigns on business conduct matters are regularly launched via the Group digital learning platform, the Learning Hub, for the most at-risk populations. In 2024, the Group launched a training on corruption and bribery for the management, legal and internal control and audit departments, and most at-risk functions (namely, sales, purchasing, business development and strategy, site directors and selected functions within operations).  Finally, each year virtual classes and webinars on business conduct, ethics and compliance matters are delivered to specific populations on an ad hoc basis.

*For more information on Training see section 1.3.1.5 of the present chapter.*

## 1.4.1.4. Management of relationships with suppliers and payment practices [G1-2]

The Group purchasing function is responsible for the management of Imerys' relationship with suppliers. The general principles relating to the purchasing process (including payment terms) and the allocation of responsibilities is defined in the Group purchasing policy.

Sustainable behavior on the part of Imerys includes complying with legal and contractual payment terms and ensuring a smooth payment process for its supplier. For this reason, the Group purchasing policy defines standard payment terms applicable to suppliers, including Small and Medium-sized Enterprises (SMEs), based on applicable legal payment terms.

The Group purchasing function also runs a comprehensive responsible purchasing program to assess suppliers' sustainability performance, covering human rights, labor, ethics, environmental and supply-change management topics.

*For more information on Workers in the value chain at Imerys refer to [ESRS S2] and Part II (on Suppliers' assessments and risk prevention and mitigation measures).*

## 1.4.1.5. Prevention and detection of corruption and bribery [G1-3]

### Antibribery compliance program

Imerys has zero tolerance against corruption and bribery and expects its managers to set the tone at the top. Imerys employees and all third parties who do business with the Group (including but not limited to joint venture partners, suppliers, clients, consultants and agents) are expected to totally ban bribery from their business practices. In addition, all Imerys suppliers are required to comply with Imerys' Supplier Environmental, Social & Governance Standards, which specifically include compliance with antibribery regulations.

Imerys has adopted a robust compliance program to deter, detect, investigate and remediate bribery incidents or allegations, in compliance with the requirements of the French Law "Sapin II", described in its antibribery policy. This policy applies to all directors, officers and employees of any Imerys legal entity, covering all activities and in all jurisdictions where the Group operates. The pillars of the Imerys antibribery compliance program are:

- An antibribery policy defining and illustrating the different types of prohibited behaviors available in 23 languages and reviewed annually;
- An internal alert system designed to enable employees and external parties to report possible violations of the antibribery policy, including incidents of corruption or bribery (see section 1.4.1.3, paragraph "Alert system and protection of whistleblowers" above);
- A regularly updated risk map designed to identify, analyze and assess the Group's exposure risks related to bribery (see section 1.4.1.2, paragraph "Bribery risk mapping process" above);
- Processes to evaluate third parties considered most at-risk;
- Extensive antibribery accounting controls specifically designed to ensure proper implementation of the Group's antibribery policy and procedures and detect potential corruption or bribery practices in the books;
- Training initiatives, in particular for most at-risk functions or positions;
- Possible disciplinary sanctions against employees in breach of the Group's antibribery policy, and
- Regular monitoring and assessment of the efficiency and robustness of the Group's antibribery program by the Ethics Committee.

The Group's antibribery policy is supported by specific procedures designed to enable employees to recognize, analyze and act upon situations entailing a risk of bribery: a gifts & hospitality procedure, a conflict of interest procedure, a donations procedure and an intermediary due diligence procedure. For gifts, hospitalities and donations, procedures include rules on reporting and prior approval by management and, for certain cases, the legal department. For conflicts of interests, the procedure sets out rules on reporting and proper management of such situations. The intermediary due diligence procedure is designed to mitigate risks of bribery when appointing intermediaries (including but not limited to agents and distributors). The investigation process of alleged bribery practices and the reporting of outcomes to senior management are detailed in the Group whistleblowing policy (see section on the "Alert system and protection of whistleblowers" above).

The Group tax policy is fully in line with the best international standards with respect to anti-tax avoidance and tax evasion practices. The Group operates in countries chosen solely for industrial or commercial purposes and does not enter into artificial arrangements for tax planning purposes, neither transfer value created to low tax jurisdictions, nor use secrecy jurisdictions or so-called "tax havens" for tax avoidance. It is committed to full compliance with its tax obligations, paying the right amount of tax in the right country at the right time.

Imerys fully supports the principle of open and accountable management of mineral resources. To this effect, and in accordance with the provisions of article L. 225-102-3 of the French Code of Commerce, Imerys reports on payments greater than or equal to €100,000 made in favor of governmental authorities by Group entities conducting activities in exploration, prospecting, discovery, development or extraction of minerals. This report is filed with the French Register of Commerce and available on the website of the Group as per the conditions prescribed by the Law.

#### Communication and training on bribery and corruption

The antibribery policy can be found on the Group intranet, and is thereby accessible to all employees of every Group entity. It has been translated into the Group's main working languages. The antibribery policy also forms part of the Internal Rules (Règlements Intérieurs) of the Imerys Group's French entities. All other policies, procedures forming part of the antibribery compliance program are also available at all times on the Group intranet, together with training material to respond to employees' questions and help them implement Group procedures. Antibribery is also regularly addressed in group internal communications and newsletters.

Training is deployed to ensure employees understand the implications of the antibribery policy and related procedures using e-learning courses and virtual classes. The Group provides online training on antibribery to all connected newcomers and deploys mandatory training campaigns for a selected population amongst its connected employees. These training courses cover the fundamentals of the fight against bribery: definition and key notions, applicable laws and their objectives, group policies, procedures and alert mechanism, and examples of at-risk situations involving, as the case may be, public officials.

In 2024, the Group offered:

- A mandatory online training for all newcomers as part of the onboarding program;
- A mandatory online training for at-risk functions (namely, sales, purchasing, business development and strategy, site directors and selected functions within operations, management, legal and internal control and audit departments); at-risk-functions covered by the training represent around 11% of all Group employees.
- Voluntary virtual classes respectively for operations and legal functions. (see section "Communication and training on business conduct matters" above).

### 1.4.1.6. Confirmed incidents of corruption or bribery [G1-4]

Imerys does not have any convictions and fines for violation of anti corruption and antibribery laws to report for 2024.

Appropriate remedial actions are implemented in case of breaches of Imerys' antibribery policy and related procedures. Communication, training and disciplinary actions may be taken (including termination of employment, in accordance with local laws).

### 1.4.1.7. Political influence and lobbying activities [G1-5]

As a leader of the mineral based specialties for industry, Imerys is invested in the public debate and interacts with various stakeholders in countries where it operates. It firmly believes that its engagement with public authorities can play a constructive role in the public decision-making process.

In line with Its Code of Business Conduct and Ethics, Imerys is committed to ensure that its lobbying activities and the representation of its business interests, in particular through its memberships in selected professional associations, are carried out with integrity and transparency. The Group seeks to uphold its business ethics and values in the industry sector and beyond.

In 2023, the Group appointed a Vice President for Public Affairs responsible for the oversight of these activities. The Vice President for Public Affairs reports to the Chief Human Resources Officer, who is a member of the Executive Committee and the Ethics Committee, and regularly informs the Chief Executive Officer of the activities undertaken.

In line with its prohibition to make contributions to political parties, politicians and institutions expressed in its Code, the Group did not make any financial or in kind political contributions in 2024.

In 2024, Imerys was not directly involved in lobbying activities around proposed regulations. The Group participated in the public debate indirectly through its memberships in professional associations.

Imerys is registered in the EU Transparency Register under number 175286523869-61 and the French national transparency register (Répertoire des représentants d'intérêts of the French High Authority for Transparency in Public Life (HATVP)).

### 1.4.1.8. Payment practices [G1-6]

Imerys monitors compliance with payment terms in order to mitigate the risk of late payment. Currently, this monitoring includes payments to SMEs, however the Group is not technically capable of monitoring SMEs specifically and separately from other suppliers.

In 2024, the average time taken by Imerys to pay an invoice from the date the contractual/legal term of payment starts to be calculated was 50 days. This percentage is calculated based using a representative sampling (i.e. invoices received from suppliers representing 98% of the total spent).

The Group has defined a list of standard payment terms in its Purchasing Policy, subject to applicable national regulations. Alignment with standard payment terms is monitored in the Group information systems, taking into account Group payment practices.

In December 2024, Imerys became involved in two legal proceedings related to late payments, which prompted immediate action from the Group. Following these interventions, Imerys successfully resolved one case by reaching an agreement with the supplier, while the other case is ongoing.

## 1.5. Disclosure Requirements covered [IRO-2]

| Topic | ESRS 2 reference | Materiality | Chapter(s) and Section(s) |
|---|---|---|---|
| *ESRS 2- General disclosures* | | | |
| BP-1 – General basis for preparation of the Sustainability Statement | BP-1 | Mandatory disclosure not subject to materiality assessment | 1.1.1.1 |
| BP-2 – Disclosures in relation to specific circumstances | BP-2 | | 1.1.1.2 |
| GOV-1 – The role of the administrative, management and supervisory bodies | GOV-1 | | 1.1.2.1 & Chapter 4, section 4.1.1 |
| GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies | GOV-2 | | 1.1.2.2 |
| GOV-3 – Integration of sustainability-related performance in incentive schemes | GOV-3 | | 1.1.2.3 & Chapter 4, section 4.3.3.2 |
| GOV-4 - Statement on due diligence | GOV-4 | | 1.1.2.4 |
| GOV-5 - Risk management and internal controls over sustainability reporting | GOV-5 | | 1.1.2.5 & Chapter 2, section 2.2 |
| SBM-1 – Strategy, business model and value chain | SBM-1 | | 1.1.3.1 & Chapter 1, section 1.2 |
| SBM-2 – Interests and views of stakeholders | SBM-2 | | 1.1.3.2 |
| SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model | SBM-3 | | 1.1.4.2 |
| IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities | IRO-1 | | 1.1.4.1 |
| IRO-2 – Disclosure Requirements in ESRS covered by the undertaking's Sustainability Statement | IRO-2 | | 1.5 |
| **ENVIRONMENT** | | | |
| *ESRS E1- Climate change* | | | |
| ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes | GOV-3 | Mandatory disclosure not subject to materiality assessment | 1.2.2.1 |
| E1-1 – Transition plan for climate change mitigation | - | Material | 1.2.2.4 |
| ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model Impact, risk and opportunity management | SBM-3 | Mandatory disclosure not subject to materiality assessment | 1.2.2.3 |
| ESRS 2 IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities | IRO-1 | Mandatory disclosure not subject to materiality assessment | 1.2.2.2 |
| E1-2 – Policies related to climate change mitigation and adaptation | MDR-P | Material | Phased in |
| E1-3 – Actions and resources in relation to climate change policies | MDR-A | Material | 1.2.2.4, 1.2.2.5 |
| E1-4 – Targets related to climate change mitigation and adaptation | MDR-T | Material | 1.2.2.4, 1.2.2.5 |
| E1-5 - Energy consumption and mix | MDR-M | Material | 1.2.2.6 |
| E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions | MDR-M | Material | 1.2.2.6 |
| E1-7 – GHG removals and GHG mitigation projects financed through carbon credits | | Not applicable | - |
| E1-8 – Internal carbon pricing | | Material | 1.2.2.6 |
| E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities | | Material | 1.2.2.7 |
| *ESRS E2- Pollution* | | | |
| ESRS 2 IRO-1 – Description of the processes to identify and assess material pollution-related impacts, risks and opportunities | IRO-1 | Mandatory disclosure not subject to materiality assessment | 1.2.3.1 |
| E2-1 – Policies related to pollution | MDR-P | Material | 1.2.3.2 |
| E2-2 – Actions and resources related to pollution | MDR-A | Material | 1.2.3.3 |
| E2-3 – Targets related to pollution | MDR-T | Material | 1.2.3.4 |
| E2-4 – Pollution of air and water | MDR-M | Material | 1.2.3.5 |
| E2-4 – Pollution of soil | MDR-M | Not material | - |
| E2-5 - Substances of concern and substances of very high concern | MDR-M | Not material | - |
| E2-6 – Anticipated financial effects from material pollution-related risks and opportunities | | Material | 1.2.3.6 |
| *ESRS E3- Water and Marine Resources* | | | |

| Topic | ESRS 2 reference | Materiality | Chapter(s) and Section(s) |
|---|---|---|---|
| ESRS 2 IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities | IRO-1 | Mandatory disclosure not subject to materiality assessment | 1.2.4.1 |
| E3-1 – Policies related to water and marine resources | MDR-P | Material | 1.2.4.2 |
| E3-2 – Actions and resources related to water and marine resources | MDR-A | Material | 1.2.4.3 |
| E3-3 – Targets related to water and marine resources | MDR-T | Material | 1.2.4.4 |
| E3-4 – Water consumption | MDR-M | Material | 1.2.4.5 |
| E3-5 – Anticipated financial effects from material water: and marine resources-related risks and opportunities | | Not material | - |
| *ESRS E4- Biodiversity and Ecosystems* | | | |
| E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model | | Material | 1.2.5.2 |
| ESRS 2 SBM 3 – Material impacts, risks and opportunities and their interaction with strategy and business model | SBM-3 | Mandatory disclosure not subject to materiality assessment | 1.2.5.2 |
| ESRS 2 IRO-1 Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities | IRO-1 | Mandatory disclosure not subject to materiality assessment | 1.2.5.1 |
| E4-2 – Policies related to biodiversity and ecosystems | MDR-P | Material | 1.2.5.3 |
| E4-3 – Actions and resources related to biodiversity and ecosystems | MDR-A | Material | 1.2.5.4 |
| E4-4 – Targets related to biodiversity and ecosystems | MDR-T | Material | 1.2.5.5 |
| E4-5 – Impact metrics related to biodiversity and ecosystems change | MDR-M | Material | 1.2.5.6 |
| E4-6 – Anticipated financial effects from material biodiversity and ecosystem-related risks and opportunities | | Material | 1.2.5.7 |
| *ESRS E5- Resource Use and Circular Economy* | | | |
| ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities | IRO-1 | Mandatory disclosure not subject to materiality assessment | 1.2.6.1 |
| E5-1 – Policies related to resource use and circular economy | MDR-P | Material | 1.2.6.2 |
| E5-2 – Actions and resources related to resource use and circular economy | MDR-A | Material | 1.2.6.3 |
| E5-3 – Targets related to resource use and circular economy | MDR-T | Material | 1.2.6.4 |
| E5-4 – Resource inflows | MDR-M | Material | 1.2.6.5 |
| E5-5 – Resource outflows | MDR-M | Material | 1.2.6.5 |
| E5-6 – Anticipated financial effects from material resource use and circular economy-related risks and opportunities | | Material | Phased in |
| **SOCIAL** | | | |
| *ESRS S1- Own Workforce* | | | |
| Disclosure Requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders | SBM-2 | Mandatory disclosure not subject to materiality assessment | 1.1.3.2 |
| Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction of with strategy and business model | SBM-3 | Mandatory disclosure not subject to materiality assessment | 1.3.1.1 |
| S1-1 – Policies related to own workforce | MDR-P | Material | 1.3.1.4, 1.3.1.5, 1.3.1.6 |
| S1-2 – Processes for engaging with own workers and workers' representatives about impacts | | Material | 1.3.1.2 |
| S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns | | Material | 1.3.1.3 |
| S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities | MDR-A | Material | 1.3.1.4, 1.3.1.5, 1.3.1.6 |
| S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | MDR-T | Material | 1.3.1.4, 1.3.1.5 |
| S1-6 – Characteristics of the undertaking's employees | MDR-M | Material | 1.3.1.8 |
| S1-7 – Characteristics of non-employee workers in the undertaking's own workforce | MDR-M | Material | 1.3.1.8 |
| S1-8 – Collective bargaining coverage and social dialogue | MDR-M | Not material | 1.3.1.8 |

| Topic | ESRS 2 reference | Materiality | Chapter(s) and Section(s) |
|---|---|---|---|
| S1-9 – Diversity metrics | MDR-M | Material | 1.3.1.5 |
| S1-10 – Adequate wages | MDR-M | Not material | - |
| S1-11 – Social protection | MDR-M | Material | 1.3.1.8 |
| S1-12– Persons with disabilities | MDR-M | Material | 1.3.1.5 |
| S1-13 – Training and skills development metrics | MDR-M | Material | 1.3.1.6 |
| S1-14 – Health and safety metrics | MDR-M | Material | 1.3.1.4 |
| S1-15 – Work-life balance metrics | MDR-M | Material | Phased in |
| S1-16 – Compensation metrics (pay gap and total compensation) | MDR-M | Not material | 1.3.1.8 |
| S1-17 – Incidents, complaints and severe human rights impacts | MDR-M | Material | 1.3.1.8 |
| *ESRS S2- Value Chain* | | | |
| ESRS 2 SBM-2 Interests and views of stakeholders | SBM-2 | Mandatory disclosure not subject to materiality assessment | 1.1.3.2 |
| ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model | SBM-3 | Mandatory disclosure not subject to materiality assessment | 1.3.2.1 |
| S2-1 – Policies related to value chain workers | MDR-P | Material | 1.3.2.2 |
| S2-2 – Processes for engaging with value chain workers about impacts | | Material | 1.3.2.3 |
| S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns | | Material | 1.3.2.4 |
| 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 | MDR-A | Material | 1.3.2.5 |
| S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | MDR-T | Material | 1.3.2.6 |
| *ESRS S3- Affected communities* | | | |
| ESRS 2 SBM-2 Interests and views of stakeholders | SBM-2 | Mandatory disclosure not subject to materiality assessment | 1.3.3.1 |
| ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model | SBM-3 | | 1.3.3.2 |
| S3-1 – Policies related to affected communities | MDR-P | Material | 1.3.3.3 |
| S3-2 – Processes for engaging with affected communities about impacts | | Material | 1.3.3.4 |
| S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns | | Material | 1.3.3.5 |
| S3-4 – Taking action on material impacts, and approaches to mitigating material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions and approaches | MDR-A | Material | 1.3.3.6 |
| S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | MDR-T | Material | 1.3.3.7 |
| *ESRS S4- Consumers and end-users* | | | |
| ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model | SBM-3 | Mandatory disclosure not subject to materiality assessment | 1.3.4.1 |
| S4-1 – Policies related to consumers and end-users | MDR-P | Material | 1.3.4.2 |
| S4-2 – Processes for engaging with consumers and end-users about impacts | | Not applicable | - |
| S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns | | Not applicable | - |
| S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions | MDR-A | Material | 1.3.4.2 |
| S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | MDR-T | Material | 1.3.4.3 |
| **GOVERNANCE** | | | |

| Topic | ESRS 2 reference | Materiality | Chapter(s) and Section(s) |
|---|---|---|---|
| *ESRS G1- Business Conduct* | | | |
| GOV 1 - The role of the administrative, management and supervisory bodies | GOV-1 | Mandatory disclosure not subject to materiality assessment | 1.4.1.1 & Chapter 4 |
| IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities | IRO-1 | | 1.4.1.2 |
| G1-1– Business conduct policies and corporate culture | | Material | 1.4.1.3 |
| G1-2 – Management of relationships with suppliers | | Material | 1.4.1.4 |
| G1-3 – Prevention and detection of corruption and bribery | | Material | 1.4.1.5 |
| G1-4 – Incidents of corruption or bribery | | Material | 1.4.1.6 |
| G1-5 – Political influence and lobbying activities | | Material | 1.4.1.7 |
| G1-6 – Payment practices | | Material | 1.4.1.8 |

## 1.6. Synthesis of quantitative information

### Indicators related to ESRS 2 - General disclosures

| Topic | Indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Proportion of variable remuneration dependent on ESG-related criteria | Proportion of sustainability criterion in the annual variable compensation for Chief Executive Officer (STI) | % | 15% | 15% | 0% |
| | Proportion of the sustainability criterion in the long term incentive plan (LTI) | % | 15% | 15% | 0% |
| Rating Agencies | CDP (Climate change) | / | A | B | B |
| | CDP (Water) | / | B- | C | - |
| | Ecovadis | # | 73 | 66 | 69 |
| | MSCI | / | AA | AA | AA |
| | Sustainalytics | # | 30.4 | 31 | 31 |
| | ISS-ESG | / | C+ (prime status) | C | C |
| | S&P Global | # | 62 | 57 | 57 |
| Sustainable Development Challenge | Number of initiatives submitted through the Sustainable Development Challenge | # | 243 | 253 | 429 |
| Group objectives and performance | Improve Group Safety Culture Maturity[1] across all Business Areas | # | 3.2 | 3.1 | 3.0 |
| | Increase the global Occupational Health action plan improvement rate | % | 63% | 73% | 0% |
| | Increase the score of the Diversity, Equity & Inclusion Index[2] | % | 66% | 40% | 0 |
| | Improve stakeholder engagement by ensuring 100% of priority sites identify and assess potential impacts on local stakeholders as per Group requirements. (NEW) | % | 74% | - | - |
| | Improve the external sustainability rating of the Group compared to 2022 assessment | # | 73 | 66 | 69 |
| | Deploy a sustainability rating scheme of Group suppliers (by spend) | % | 70% | 61% | 53% |
| | Assess the Products in Application Combinations (PAC) of Imerys product portfolio (by revenue) according to sustainability criteria[3] | % | 71% | 65% | 55% |
| | Ensure the Group New Product Developments are scored as SustainAgility Solutions[4] | % | 86% | 78% | 75% |
| | Reduce environmental impacts by assessing the maturity level of sites against environmental management requirements[5] | % | 100% | 100% | 0% |
| | Reduce the risk of air pollution by ensuring 100% of priority sites[6] define site specific air emission management plans by the end of 2025 (NEW) | % | 0% | - | - |
| | Improve water management by ensuring priority sites[7] comply with new water reporting requirements | % | 55% | 22% | 0 |
| | Reduce impact on biodiversity by filling our Act4nature commitments and conducting biodiversity audits at the priority sites[8] | % | 82% | 57% | 39% |
| | Reduce Group Scope 1 & 2 greenhouse gas emissions ($tCO_2eq$) by 42% from 2021 base year in alignment with a 1.5°C trajectory by the end of 2030 | % | -28% | -24% | -12% |
| | Reduce Group Scope 1 & 2 greenhouse gas emissions by 36% relative to revenue ($tCO_2eq$/€ million) by 2030[9] | % | -32% | -31% | -30% |
| | Reduce Group Scope 3 greenhouse gas emissions ($tCO_2eq$) by 25% from 2021 base year by the end of 2030 (from purchased goods and services, capital goods, fuel and energy related activities, upstream and downstream transportation and distribution, waste generated in operations, business travel, employee commuting, and investments) | % | -15% | -6% | - |
| | Improve resilience to physical climate risks by assessing 100% of Group operations according to climate scenarios and developing adaptation strategies for the three most significant risks by the end of 2025 (NEW). | % | 0% | - | - |

1 Maturity Level 3 corresponds to Proactive level on the Imerys Safety Culture Maturity Matrix where Imerys Safety System is "fully implemented, employees are engaged and contribute actively".
2 Imerys' Diversity, Equity & Inclusion Index is a composite metric used to track diversity, equity and inclusion across a range of dimensions including gender balance, pay equity, nationality, disability, as well as inclusion.
3 The Group portfolio is assessed using the SustainAgility Solutions Assessment methodology, which is based on the World Business Council for Sustainable Development's Portfolio Sustainability Assessment framework.
4 Based on the SustainAgility Solutions Assessment framework a "SustainAgility Solution" is a product in an application that has scored within the two highest categories of the four possible categories.
5 Environmental management requirement as defined by Imerys policies and measured by the environmental maturity matrix, which is based on leading international environmental management system standards.
6 The list of priority sites with respect to air emissions is based on (1) Instances where substance threshold exceedances affect more than two sites within the Group (2) sites that exceed the thresholds specified in the European Pollutant Release and Transfer Register (E-PRTR) list.
7 Priority sites refer to water withdrawal and/or discharge > 1 M $m^3$/year and/or located in extremely high water stress zones.
8 Priority sites for biodiversity audits have been defined as sites with a quarry that extracts more than 1 million tonnes per year, or are located within a radius of 5 km of an area classified as International Union for Conservation of Nature (IUCN) category I, II or III, or are located in a biodiversity hotspot within a radius of 5 km of an area classified IUCN category IV.
9 This objective refers to the SBTi Target from 2019 and is linked to the Sustainability Linked Bond (SLB) issued in 2021, thus even though superceeded in 2023 with a new, more ambitious target, it shall continue to be reported until 2030.

## Indicators related to the European taxonomy

| Taxonomy eligible and / or aligned Activities | Eligibility Alignment | Revenue(1) | | Capex(2) | | Opex (3) | |
|---|---|---|---|---|---|---|---|
| | | 2024 | 2023 | 2024 | 2023 | 2024 | 2023 |
| Manufacture of carbon black | Eligible | 3.5% | 2.9% | 7.8% | 11.3% | 2.4% | 1.6% |
| | Aligned | 0.0% | 0.0% | 0.8% | 0.5% | 0.0% | 0.0% |
| Manufacture of cement/ clinker | Eligible | 13.1% | 12.3% | 7.2% | 7.2% | 11.8% | 11.2% |
| | Aligned | 11.9% | 11.2% | 6.3% | 6.9% | 11.5% | 10.8% |
| **Total** | **Eligible** | **16.7%** | **15.2%** | **15.0%** | **18.5%** | **14.2%** | **12.7%** |
| | **Aligned** | **11.9%** | **11.2%** | **7.1%** | **7.4%** | **11.5%** | **10.8%** |

*(1) in % of Group Revenue*
*(2) in % of Group Capex*
*(3) in % of Group Opex*

| Category | KPIs | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| **Environment** | | | | | |
| *EU Sustainable Finance Taxonomy* | | | | | |
| EU Sustainable finance Taxonomy non-eligible economic activity | Revenue | € million | 3,004 | 3,218 | 3,662 |
| | Capex | € million | 358 | 380 | 342 |
| | Opex | € million | 199 | 201 | 215 |
| EU Sustainable finance Taxonomy eligible economic activity | Revenue | € million | 601 | 577 | 619 |
| | Capex | € million | 63 | 86 | 89 |
| | Opex | € million | 33 | 29 | 27 |
| EU Sustainable finance Taxonomy aligned economic activity | Revenue | € million | 429 | 425 | 498 |
| | Capex | € million | 30 | 34 | 36 |
| | Opex | € million | 27 | 25 | 24 |

## Indicators related to ESRS E1 - Climate change

| Topic | Indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Rating Agencies | CDP (Climate change) | / | A | B | B |
| Energy efficiency and recovery lever | GHG emissions reduction due to energy efficiency and recovery lever | $KtCO_2eq$ | ~60 | - | - |
| | Capex amounts spent for energy efficiency and recovery initiatives | € million | 12.696 | - | - |
| | of which heat recovery project in Belgium | € million | 3.4 | - | - |
| | GHG emissions reduction due to switch from coal to peanut ground hulls (from 2018 base year) | $KtCO_2eq$ | ~ 30 | - | - |
| | GHG emissions reduction due to switch from diesel to renewable diesel for mobile equipment | $KtCO_2eq$ | ~5 | - | - |
| | Capex amounts spent for fuel switching and biomass initiatives | € million | 4.9 | - | - |
| | Opex amounts spent for fuel switching and biomass initiatives | € million | 8.1 | - | - |
| Low-carbon and renewable electricity lever | Share of the consumption of low carbon and renewable electricity in the electricity mix | % | 22% | 10% | - |
| | GHG emissions reduction achieved compared to baseline | $KtCO_2eq$ | ~ 6 | - | - |
| Electrification lever | Capex amounts spent for electrification initiatives | € thousands | 535 | - | - |
| Process innovation | Capex amounts spent for process innovation initiatives | € thousands | 588 | - | - |
| Supplier engagement in Scope 3 GHG emissions reduction | Share of Scope 3 GHG emissions in total emissions | % | 71% | - | - |
| Climate adaptation actions | Capex amounts spent for climate change adaptation actions | € thousands | 280 | - | - |

| Topic | Indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Non-renewable energy consumption | Fuel consumption from coal and coal products | MWh | 280,353 | 316,450 | 367,283 |
| | Fuel consumption from crude oil and petroleum products | MWh | 1,258,625 | 1,443,302 | 1,643,758 |
| | Fuel consumption from natural gas | MWh | 2,706,720 | 2,492,483 | 2,875,100 |
| | Fuel consumption from other fossil sources | MWh | 6,078 | 6,532 | 8,132 |
| | Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources | MWh | 1,708,182 | 2,014,322 | 2,350,523 |
| | Total fossil energy consumption | MWh | 5,959,957 | 6,273,089 | 7,244,796 |
| | Share of fossil sources in total energy consumption | % | 89.6% | 94% | 93% |
| Renewable energy consumption | Consumption from nuclear sources | MWh | 274,593 | 118,370 | 235,135 |
| | Share of consumption from nuclear sources in total energy consumption | % | 4.1% | 2% | 3% |
| | Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) | MWh | 246,959 | 207,409 | 205,077 |
| | Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources | MWh | 168,162 | 92,811 | 115,089 |
| | The consumption of self-generated non-fuel renewable energy | MWh | 85 | 103 | 50 |
| | Total renewable energy consumption | MWh | 415,206 | 300,323 | 320,216 |
| | Share of renewable sources in total energy consumption | % | 6.24% | 4.5% | 4.1% |
| Energy consumption | Total energy consumption | MWh | 6,649,756 | 6,691,781 | 7,800,146 |
| Energy intensity per net revenue | Total energy consumption per net revenue (from activities in high climate impact sectors) | MWh/€ million | 1,845 | 1,764 | 1,822 |
| | Net revenue from activities in high climate impact sectors used to calculate energy intensity | € million | 3,605 | 3,794 | 4,282 |
| Total Scope 1, 2 & 3 emissions | Gross Scope 1 GHG emissions | $ktCO_2eq$ | 1,281 | 1,311 | 1,478 |
| | Percentage of Scope 1 GHG emissions from regulated emission trading schemes | $ktCO_2eq$ | 34% | 37% | 32.9% |
| Scope 1 & 2 GHG emissions | Gross location-based Scope 2 GHG emissions | $KtCO_2eq$ | 601 | 585 | 690 |
| | Gross market-based Scope 2 GHG emissions | % | 502 | 587 | 702 |
| | Total Scope 1 & 2 GHG emissions (location-based) | $KtCO_2eq$ | 1,882 | 1,895 | 2,169 |
| | Total Scope 1 & 2 GHG emissions (market-based) | $KtCO_2eq$ | 1,783 | 1,898 | 2,180 |
| | Total GHG emissions (Scope 1,2 &3 location-based) per net revenue | $KtCO_2eq$ | 1743 | 1607 | - |
| | Total GHG emissions (Scope 1, 2 & 3 market-based) per net revenue | $KtCO_2eq$ | 1715 | 1607 | - |
| GHG intensity per net revenue | Total net revenue (Financial statements) used to calculate GHG Intensity | $tCO_2eq$/€ million | 3,605 | 3,794 | 4,282 |
| | Total significant gross indirect (Scope 3) GHG emissions | $tCO_2eq$/€ million | 4,400 | 4,200 | 4,959 |
| | Capex | € million | 80 | 80 | 80 |
| Scope 3 GHG emissions | Research and Development (R&D) investment | $KtCO_2eq$ | 100 | 100 | 100 |
| Internal carbon prices | Physical risks (% of total asset value at risk) (NEW) | $KtCO_2eq$ | 4.1-4.6% | - | - |
| | Transition risks (€ million) | €/$tCO_2eq$ | 71-110 | - | - |
| Imerys total asset value at material risk | Physical risks (% of total asset value at risk) | % | 4.1-4.6% | - | - |
| | Transition risks (€ million of EBITDA at risk) | € million | 71-110 | - | - |

## Indicators related to ESRS E2 - Pollution

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Water and air pollutants | Number of air pollutants listed in Annex II of the E-PRTR identified (NEW) | # | 6 | - | - |
| | Number of water pollutants listed in Annex II of the E-PRTR identified (NEW) | # | 2 | - | - |
| Financial resources allocated to the prevention and mitigation of pollution | Number of major and critical environmental incidents (Level 4 and 5) (NEW) | # | 0 | 1 | 0 |
| | Capex allocated to the prevention and mitigation major environmental incidents (NEW) | € thousands | 806 | 388 | - |
| | Opex allocated to the prevention and mitigation of major and critical environmental incidents (NEW) | € thousands | 221 | 1 | - |
| | *of which Opex amounts allocated to fines (NEW)* | € thousands | 90 | 0 | - |
| Water priority sites | Number of sites exceeding emission thresholds (NEW) | # | 2 | 3 | - |
| Air pollution | Number of sites exceeding SOx emission thresholds (NEW) | # | 5 | 4 | - |
| | Number of sites exceeding NOx emission thresholds (NEW) | # | 4 | 4 | - |
| | Total SOx emissions | tonnes | 2,356 | 2,248 | 2,560 |
| | Total NOx emissions | tonnes | 4,354 | 5,503 | 6,441 |
| Financial effects | Environmental and dismantling provisions (NEW) | € million | 115.464 | - | - |

## Indicators related to ESRS E3 - Water resources

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Priority sites | Total number of priority sites | # | 48 | 48 | 48 |
| | Number of sites at very high water stress (NEW) | # | 31 | 31 | - |
| Water withdrawals | Total operational water withdrawals | million $m^3$ | 45.670 | 50.477 | 45.316 |
| | Water withdrawn from water groundwater | million $m^3$ | 21.470 | 24.142 | 18.183 |
| | Water withdrawn from suppliers | million $m^3$ | 4.233 | 3.725 | 3.510 |
| | Water withdrawn from surface water | million $m^3$ | 8.225 | 15.628 | 16.200 |
| | Water withdrawn from rainwater (NEW) | million $m^3$ | 10.023 | - | - |
| | Water withdrawn from other sources (including seawater) | million $m^3$ | 1.719 | 6.982 | 7.423 |
| Water consumption | **Total water consumption (NEW)** | million $m^3$ | 15.999 | - | 4.189 |
| | *Of which total water consumption in areas of extremely high water stress (NEW)* | million $m^3$ | 2.087 | - | - |
| Other metrics | Total water stored (NEW) | million $m^3$ | 21.096 | - | - |
| | Total water recycled and reused (NEW) | million $m^3$ | 96.166 | 89.912 | 40.385 |
| | Water intensity per net revenue | $m^3$/€ million | 12,669 | 13,304 | 10,584 |

## Indicators related to ESRS E4 - Biodiversity and land rehabilitation

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Reinforcing mitigation hierarchy | Mining sites restoration expenses | € million | 7.2 | 9.5 | - |
| Imerys' extractive sites | Total disturbed surface of Imerys' extractive priority sites (NEW) | ha | 8937 | - | - |
| | Total rehabilitated surface of Imerys' extractive priority sites (NEW) | ha | 3078 | - | - |
| Imerys' extractive sites | Number of Imerys' extractive sites located in proximity to sensitive areas (IUCN categories I, II, or III) (NEW) | # | 6 | - | - |
| Financial effects | Provisions for mining sites restoration | € million | 136.7 | 135.2 | 147.7 |

## Indicators related to ESRS E5 - Resource Use and Circular Economy

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Material resource use flows | Processed Mineral Raw Materials (NEW) | million tonnes (dry) | 19.8 | 20.5 | - |
| | *Of which from Imerys mines and quarries (NEW)* | million tonnes (dry) | 18.7 | 18.8 | - |
| | Final Product derived from Imerys mines and quarries (NEW) | million tonnes (dry) | 9.6 | 9.8 | - |
| Waste generation | Displaced Inert Mining Waste (NEW) | million tonnes (dry) | 35.2 | 39.4 | - |
| | Mineral Process Waste (NEW) | million tonnes (dry) | 9.1 | 9 | 122,182 |
| | *Of which tailings (NEW)* | *million m3 (wet)* | *2.6* | *2.5* | *1,878* |
| Other metrics | Full compliance with applicable GISTM requirements across all its tailing disposal facilities (GAP analysis percentage) (NEW) | % | 23.9% | 4.5% | - |
| Industrial waste | Total industrial waste | tonnes | 117,937 | 96,232 | 122,182 |
| | *Of which non-recycled hazardous industrial waste* | tonnes | 2,931 | 1,729 | 1,878 |
| | *Of which recycled hazardous industrial waste* | tonnes | 1,488 | 1,444 | 1,380 |
| | *Of which non-recycled non-hazardous industrial waste* | tonnes | 60,877 | 50,228 | 80,876 |
| | *Of which recycled non-hazardous industrial waste* | tonnes | 52,641 | 42,831 | 38,049 |
| | Industrial waste intensity per net revenue | (tonnes/€ million) | 33 | 25 | 29 |

## Indicators related to ESRS S1 - Imerys's own workforce

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| **Health & Safety** | | | | | |
| Health and Safety Leading activities | Bottom-up rate for 1000 working hours | # | 4.08 | 3.60 | 3.04 |
| | Inspection rate for 10,000 working hours (all inspections) | # | 9.94 | 8.67 | 6.45 |
| | Inspection rate for 10,000 working hours (Serious 7 High risks related) | # | 7.59 | 6.82 | 5.22 |
| | Number of VFL and BBS interactions recorded | # | 44176 | 43039 | 35655 |
| Fatalities | Total number of fatalities linked to work-related injuries and work-related Ill Health | # | 0 | 0 | 1 |
| | Number of fatalities of employees | # | 0 | 0 | 1 |
| | Number of fatalities of non-employees | # | 0 | 0 | 0 |
| | Number of fatalities of other workers on site | # | 0 | 0 | 0 |
| | Number of fatalities as a result of work-related injuries of employees | # | 0 | 0 | 1 |
| | Number of fatalities as a result of work-related injuries of non-employees | # | 0 | 0 | 0 |
| | Number of fatalities as a result of work-related injuries of other workers on site | # | 0 | 0 | 0 |
| | Number of fatalities as a result of work-related ill health of employees | # | 0 | 0 | 0 |
| | Number of fatalities as a result of work-related ill health of non-employees | # | 0 | 0 | 0 |
| | Number of fatalities as a result of work-related ill health of other workers on site | # | 0 | 0 | 0 |
| Life-changing injuries | Total number of life-changing injuries | # | 1 | 2 | 2 |
| | Number of life-changing injuries of employees | # | 1 | 2 | 0 |
| | Number of life-changing injuries of non-employees | # | 0 | 0 | 2 |
| | Number of life-changing injuries of other workers on site (NEW) | # | 0 | 1 | 0 |
| Lost-Time Accident rates | Lost-time accident rate (own workforce and other workers on site) | - | 1.76 | 1.21 | 1.58 |
| | Lost-time accident rates of employees | - | 1.69 | 1.04 | 1.31 |
| | Lost-time accident rates of non-employees | - | 1.27 | 1.77 | 2.32 |
| | Lost-time accident rates of other workers on site (NEW) | - | 2.25 | | |
| Number of days lost due to injuries and fatalities from work-related accidents | Total number of lost days due to injuries and fatalities from work-related accidents (own workforce and other workers on site) (NEW) | # | 2,897 | 1152 | 2520 |
| | Number of lost days of employees due to injuries and fatalities from work-related accidents (NEW) | # | 2,153 | 710 | 1735 |
| | Number of lost days of non-employees due to injuries and fatalities from work-related accidents (NEW) | # | 114 | 442 | 785 |
| | Number of lost days of other workers on site due to injuries and fatalities from work-related accidents | # | 630 | | |
| Number of recordable work-related accidents | Total number of recordable work-related accidents (own workforce and other workers on site) (NEW) | # | 106 | 78 | 1978 |
| | Number of recordable work-related accidents of employees (NEW) | # | 76 | 54 | 52 |
| | Number of recordable work-related accidents of non-employees (NEW) | # | 5 | 24 | 31 |
| | Number of recordable work-related accidents of other workers on site | # | 25 | | |
| Recordable work-related accidents rates | Rate of recordable work-related accidents (own workforce and other workers on site) (NEW) | - | 3.39 | 2.36 | 2.43 |
| | Rate of recordable work-related accidents of employees (NEW) | - | 3.28 | 2.19 | 2.07 |
| | Rate of recordable work-related accidents of non-employees (NEW) | - | 2.12 | 2.91 | 3.43 |
| | Rate of recordable work-related accidents of other workers on site | - | 4.33 | | |
| Worked hours | Total number of worked hours (own workforce and other workers on site) | hours | 31,274,272 | 33,033,256 | 34,189,822 |
| | Number of worked hours of employees | hours | 23,142,884 | 24,769,931 | 25,158,240 |
| | Number of worked hours of non-employees | hours | 2,360,501 | 8,263,325 | 9,031,581 |
| | Number of worked hours of other workers on site | hours | 5,770,887 | | |

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Case of recordable work-related ill health, subject to legal restrictions on the collection of data | Total number of cases of recordable work-related ill health, subject to legal restrictions on the collection of data | # | 5 | 4 | 5 |
| | Number of cases of recordable work-related ill health of employees subject to legal restrictions on the collection of data | # | 5 | 4 | 5 |
| | Number of cases of recordable work-related ill health of non-employees subject to legal restrictions on the collection of data | # | 0 | 0 | 0 |
| Number of days lost due to ill health and fatalities from work-related to ill health | Total number of lost days due to ill health and fatalities from work-related to ill health of employees and non-employees (NEW) | # | 413 | 170 | - |
| | Number of lost days of employees due to ill health and fatalities from work-related to ill health (NEW) | # | 413 | 170 | - |
| | Number of lost days of non-employees due to ill health and fatalities from work-related to ill health (NEW) | # | 0 | 0 | - |
| Number of days lost due to ill health and fatalities from work-related to ill health | Percentage of employees and non-employees covered by Imerys health and safety management system (SMS) based on legal requirements and (or) recognized standards or guidelines (NEW) | % | 100% | 100% | 100% |
| | Percentage of workforce covered by an SMS which have been internally audited (NEW) | % | 19.8% | - | - |
| | Percentage of workforce covered by an SMS which have been audited/ certified by an external party (NEW) | % | 20.7% | - | - |
| **Diversity, Equity & Inclusion** | | | | | |
| Gender | Number of women Board members | # | 4 | 5 | |
| | Number of women at top management level[1] (NEW) | # | 26 | - | - |
| | Number of women Executive Committee members[2] | # | 3 | - | - |
| | Number of women in Senior Management roles[3] | # | 23 | - | - |
| | Number of women in manager/expert/professional roles | # | 1,415 | - | - |
| | Number of women in Paraprofessional roles | # | 1,142 | - | - |
| | Total number of women employees | # | **2,583** | - | - |
| | Percentage of women Board members (NEW) | % | 40% | 50% | 40% |
| | Percentage of women at top management level (NEW) | % | 28% | - | - |
| | Percentage of women Executive Committee members (NEW) | % | 33% | 33% | 20% |
| | Percentage of women in senior management roles (NEW) | % | 27% | 27% | 26% |
| | Percentage of women in manager/expert/professional roles (NEW) | % | 33% | 32% | 31% |
| | Percentage of women in Paraprofessional roles (NEW) | % | 14% | 13% | 13% |
| | Percentage of women in the Group (NEW) | % | 21% | 20% | 19% |
| Disability | Number of employees with a disability | # | 154 | 195 | 189 |
| | Number of women employees with a disability in the Group (NEW) | # | 40 | - | - |
| | Number of men employees with a disability in the Group (NEW) | # | 114 | - | - |
| | Percentage of employee with a disability | % | 1.24% | 1.42% | 1.36% |
| | Percentage of women employees with a disability in the Group (NEW) | % | 1.55% | - | - |
| | Percentage of men employees with a disability in the Group (NEW) | % | 1.16% | - | - |
| | Percentage of persons with disabilities in the Group subject to legal restrictions on the collection of data | % | 1.33% | - | - |
| Age range | Percentage of employees with less than 30 years | % | 13% | 12% | 12% |
| | Percentage of employees from 30 to 50 years | % | 52% | 53% | 54% |
| | Percentage of employees over 50 years | % | 35% | 35% | 34% |
| | Average age of Imerys employees | # | 44 | 44 | - |
| **Training & skills development** | | | | | |

1 Top management level includes not only Executive Committee members but also Senior Management roles
2 The Executive Committee includes all its members, with the CEO among them
3 Senior management roles include the roles that directly report to Executive Committee members (excluding assistants/secretaries, etc.) or directly report to the Chief Information Officer or Business Area Purchasing Directors.

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Training hours | Average number of training hours per employee | # | 20 | 19 | 17 |
| | Average number of training hours per woman employee | # | *15* | - | - |
| | Average number of training hours per man employee | # | *21* | - | - |
| Performance and career development | Percentage of employees that participated in regular performance and career development reviews | % | 57% | 43% | 34% |
| | Percentage of women employees that participated in regular performance and career development reviews | % | *80%* | - | - |
| | Percentage of men employees that participated in regular performance and career development reviews | % | *51%* | - | - |
| **Other workforce related metrics** | | | | | |
| Collective Bargaining Agreements | Percentage of employees covered by Collective Bargaining Agreements (CBAs) | % | 67% | 66% | 67% |
| Total number of employees and non-employees | Number of employee (headcount) | # | 12,392 | 13,698 | 13,892 |
| | *Number of permanent employees (headcount)* | # | 10,829 | 12,931 | 13,028 |
| | *Number of temporary (fixed-term for Imerys) employees (headcount)* | # | 363 | 767 | 864 |
| | *Number of non-guaranteed hours employees (headcount)* | # | 1,200 | - | - |
| | Average number of employees (headcount) | # | 12,896 | 13,910 | 13,968 |
| | Number of non-employee and other workers in Imerys' workforce (Full-Time Equivalent) | FTE | 3,862 | 4123 | 4710 |
| | Number of non-employee workers in Imerys' workforce (Full-Time Equivalent) | FTE | 1,086 | - | - |
| | *of which temporary agency worker (Full-Time Equivalent)* | *FTE* | 1,047 | - | - |
| | *of which self-employed workers (Full-Time Equivalent)* | *FTE* | 39 | - | - |
| Breakdown of employees per contract and gender | Number of permanent employees (headcount) | # | 10,829 | 12,931 | 13,028 |
| | *Number of permanent women employees (headcount)* | # | 2,333 | *2,466* | *2,429* |
| | *Number of permanent men employees (headcount)* | # | 8,496 | *10,457* | *10,599* |
| | Number of temporary (fixed-term for Imerys) employees (headcount) | # | 363 | 767 | 864 |
| | *Number of temporary (fixed-term for Imerys) women employees (headcount)* | # | 144 | *220* | *221* |
| | *Number of temporary (fixed-term for Imerys) men employees (headcount)* | # | 219 | *547* | *643* |
| | Number of non-guaranteed hours employees (headcount) | # | 1,200 | - | - |
| | *Number of non-guaranteed hours women employees (headcount)* | # | 106 | - | - |
| | *Number of non-guaranteed hours men employees (headcount)* | # | 1,094 | - | - |
| | Number of full-time employees (headcount) | # | 12,124 | 13,444 | 13,627 |
| | *Number of full-time women employees (headcount)* | # | 2,406 | *2,520* | *2,481* |
| | *Number of full-time men employees (headcount)* | # | 9,718 | *10,916* | *11,146* |
| | Number of part-time employees (headcount) | # | 268 | 254 | 265 |
| | *Number of part-time women employees (headcount)* | # | 177 | *166* | *169* |
| | *Number of part-time men employees (headcount)* | # | 91 | *88* | *96* |

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Breakdown of employees per contract and region | Number of employees in Europe (headcount) | # | 6,257 | 6,681 | 6,802 |
| | *Number of permanent employees (headcount)* | # | 5,972 | 6,378 | 6,406 |
| | *Number of temporary (fixed-term for Imerys) employees (headcount)* | # | 265 | 303 | 396 |
| | *Number of non-guaranteed hours employees (headcount)* | # | 20 | - | - |
| | *Number of full-time employees (headcount)* | # | 6,003 | 6,441 | 6,550 |
| | *Number of part-time employees (headcount)* | # | 254 | 240 | 252 |
| | % of employees in Europe | % | 50% | 49% | 49% |
| | Number of employees in Americas (headcount) | # | 3,452 | 4,076 | 4,111 |
| | *Number of permanent employees (headcount)* | # | 2,234 | 4,047 | 4,089 |
| | *Number of temporary (fixed-term for Imerys) employees (headcount)* | # | 38 | 29 | 22 |
| | *Number of non-guaranteed hours employees (headcount)* | # | 1,180 | - | - |
| | *Number of full-time employees (headcount)* | # | 3,444 | 4,069 | 4,105 |
| | *Number of part-time employees (headcount)* | # | 8 | 7 | 6 |
| | % of employees in Americas | % | 18% | 30% | 29% |
| | Number of employees in Asia-Pacific (headcount) | # | 2,143 | 2,342 | 2,471 |
| | *Number of permanent employees (headcount)* | # | 2,124 | 1,949 | 2,052 |
| | *Number of temporary (fixed-term for Imerys) employees (headcount)* | # | 19 | 393 | 419 |
| | *Number of non-guaranteed hours employees (headcount)* | # | 0 | - | - |
| | *Number of full-time employees (headcount)* | # | 2,137 | 2,336 | 2,465 |
| | *Number of part-time employees (headcount)* | # | 6 | 6 | 6 |
| | % of employees in Asia-Pacific | % | 17% | 14% | 15% |
| | Number of employees in Africa & Middle East (headcount) | # | 540 | 599 | 508 |
| | *Number of permanent employees (headcount)* | # | 499 | 557 | 481 |
| | *Number of temporary (fixed-term for Imerys) employees (headcount)* | # | 41 | 42 | 27 |
| | *Number of non-guaranteed hours employees (headcount)* | # | 0 | - | - |
| | *Number of full-time employees (headcount)* | # | 540 | 598 | 507 |
| | *Number of part-time employees (headcount)* | # | 0 | 1 | 1 |
| Breakdown of employees per gender | Men (headcount) | # | 9,809 | 11,004 | 11,241 |
| | Women (headcount) | # | 2,583 | 2,686 | 2,650 |
| | Other (headcount) | # | 0 | 0 | 0 |
| | Not reported (headcount) | # | 0 | 8 | 1 |
| | Total Employees (headcount) | # | 12,392 | 13,698 | 13,892 |
| Breakdown of employees per country | Number of employees in France (headcount) | # | 2,084 | 2,041 | 2,033 |
| | Number of employees in the United States of America (headcount) | # | 1,910 | 1,992 | 1,989 |
| | Number of employees in China (headcount) | # | 1,274 | 1,305 | 1,435 |
| | Number of employees in other countries (headcount) | # | 7,124 | 8,360 | 8,435 |
| | Percentage of employees located in France, USA and China | % | 40% | - | - |
| | Number of countries where Imerys is implemented | # | 46 | 42 | - |
| | Number of countries having over 50 employees | # | 24 | - | - |
| | Range of representativity of countries having over 50 employees and represented less than 10% of Imerys | % | 0.5% to 8.4% | - | - |
| Turnover | Number of employees who have left Imerys during the year | # | 1,453 | 1,567 | - |
| | Rate of employee turnover | % | 11.7% | 11.8% | - |
| Incidents | Number of confirmed reported incidents of discrimination (including harassment) | # | 4 | - | - |
| | Number of confirmed reported incidents on other workforce-related matters | # | 10 | - | - |
| | Number of reported severe human rights incidents | # | 0 | - | - |

## Indicators related to ESRS S2 - Responsible purchasing

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Responsible purchasing | Trainings on responsible purchasing | # | 162 | 198 | 189 |

## Indicators related to ESRS S3 - Affected communities

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Community Engagement | Donations | € thousands | 871 | - | - |
| | *Number of countries benefiting of these donations* | # | 21 | - | - |
| | Employees included in the volunteering pilot program | # | 2,500 | - | - |
| | Number of reported severe human rights issues and incidents connected to affected communities | # | 0 | - | - |

## Indicators related to ESRS S4 - Consumers and end-users

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Product sustainability targets | Assess the Products in Application Combinations (PAC) of Imerys product portfolio (by revenue) according to sustainability criteria | % | 71.13% | 65% | 55% |
| | *Number of Product in Application Combinations (PACs) assessed* | # | 514 | 462 | ~350 |
| | Ensure the Group New Product Developments are scored as SustainAgility Solutions | % | 85.6% | 78% | 75% |
| Eco-profile evaluation of Imerys portfolio | Number of product eco-profiles that Imerys conducted. | # | 320 | 250 | 189 |

## Sustainability indicators related to ESRS G1 - Business conduct

| Topic | Imerys indicator | Unit | 2024 | 2023 | 2022 |
|---|---|---|---|---|---|
| Training on bribery and corruption | Percentage of functions-at-risk covered by training programmes | % | 11% | - | - |
| Incidents of corruption and bribery | Number of convictions for violation of anti-corruption and anti-bribery laws | # | 0 | - | - |
| Political influence and lobbying activities | Amount of fines for violation of anti-corruption and anti-bribery laws | € | 0 | - | - |
| | Political contributions made | € | 0 | - | - |
| | Financial or in-kind contributions regarding lobbying expenses | € | 0 | - | - |
| Payment practices | Average number of days to pay invoice from date when contractual or statutory term of payment starts | days | 50 | - | - |
| | Number of outstanding legal proceedings for late payments | # | 2 | - | - |

# Calculation methodology [MDR-M]

## Calculation methodology of indicators related to ESRS E1 - Climate change

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| **SCOPE 1 & 2 GHG EMISSIONS** | | |
| Scope 1 | $KtCO_2eq$ | Scope 1 includes process emissions and emissions from the combustion of fossil fuels. It also includes $CH_4$ and $N_2O$ emissions from the combustion of biomass ($CO_2$ emissions from the combustion of biomass are accounted as zero due to its 100% biogenic origin). Emission factors from the updated Environmental Protection Agency (EPA) are used for the calculation of fuel- and biomass-related Scope 1 emissions. Process emissions are reported at site-level and are either measured directly from output streams or calculated using mass balances.<br><br>Fugitive emissions result from intentional or unintentional releases (e.g. equipment leaks, hydro-fluorocarbon emissions due to refrigeration and air conditioning, and methane leakages from gas transport). |
| Scope 2 (location based) | $KtCO_2eq$ | Scope 2 includes GHG emissions from purchased electricity and steam. Country-specific emission factors published by the International Energy Agency (IEA) and the Emissions and Generation Resource Integrated Database (eGRID) are used for Scope 2 location-based calculations. |
| Scope 2 (market based) | $KtCO_2eq$ | Scope 2 includes GHG emissions from purchased electricity and steam. Supplier-specific emission factors are used for this methodology's calculations. |
| **SCOPE 3 GHG EMISSIONS** | | |
| Purchased goods and services | $KtCO_2eq$ | This category includes the purchased raw materials (cradle-to-gate: extraction, processing and transportation of the raw materials), mining services and contracts (overburden, hauling, rehabilitation, drilling, explosive, blasting, crushing – also including heavy mobile equipment and tires), chemicals (purchase, processing and transportation), packaging (purchase of polypropylene, polyethylene and paper bags, pallets, covers/films), personal, IT and industrial services (consulting, hardware and software purchases, temporary manpower, audit and legal services) and professional services (interim, legal services, consulting…).<br><br>For raw materials, the calculation of the GHG emissions is based on a quantity-based method, using cradle-to-gate emission factors (extraction, production and processes, energy used, transportation). For chemicals, the calculation is performed using a quantity-based method and emission factors from Ecoinvent 9.1.1 (purchasing, processing and transportation of the chemical). For mining services and contracts, packaging, personal, IT and industrial services (consulting, hardware and software purchases, temporary manpower, audit and legal services), a spend-based calculation is performed using the Carnegie Mellon EIOLCA methodology. For professional services, the data activity was based on cost spent and the corresponding EF was determined based on the Financial Report of the supplier Group. |
| Capital goods | $KtCO_2eq$ | This category includes the manufacturing, transportation, installation of industrial equipment and services (waste is excluded and is reported in the Scope 3 waste generation category). The calculation is done on a spend-based method for the different activities using the Carnegie Mellon EIOLCA methodology. |
| Fuel-and-energy-related activities (not included in Scope 1 or 2) | $KtCO_2eq$ | This category includes well-to tank emissions of fuel consumption reported under Scopes 1 and 2. Losses and upstream emissions from purchased electricity are also included. For electricity, the mapping was done on a country basis, with country-specific electricity mixes (oil, coal, natural gas, nuclear, renewables…) taken into account. IEA 2019 data were considered. Moreover, emission factors from Ecoinvent 9.1.1 were applied for each energy source: thermal energy (extraction, production and transportation), electricity (extraction, production and distribution, energy consumed in power plants and grid losses). |
| Upstream transportation and distribution | $KtCO_2eq$ | All transportation modes within Imerys upstream value chain are included: bulk shipping, container shipping, road, intermodal (road + train) and train. All Green house gases (GHG) emissions related to transportation are calculated on a well-to-wheel basis. Emissions from distribution, including warehouses, are also included under this category. Inter-site transportation within Imerys mines and plants is excluded from this category, as it is already accounted for under scopes 1 & 2. Transportation and distribution emissions are calculated using a distance (km) and quantity-based method (tonnage), and specific emission factors according to the selected transportation mode, products transported and geographical location. Emission factors are obtained from the following sources: Ecoinvent 3.9.1 2021, EcoTransIT, University of Carnegie Mellon methodology EIOLCA and CERDI. Google maps is used to calculate the distances. |
| Waste generated in operations | $KtCO_2eq$ | All types of solid waste (including mining waste) and wastewater generated by Imerys manufacturing plants, laboratories and offices are included in this category. Office waste and production units cleaning (dust) is managed by a third-party. The calculation is performed using a spend-based method and Carnegie Mellon EIOLCA's methodology, which is an environmental input-output life cycle assessment that evaluates the impact of the economic activities on the GHG emissions. For mining operations, none of the mineral waste is treated by third-parties, meaning that it does not go into a landfill nor is it incinerated. All the mineral waste from mining is managed within Imerys' own operations and considered under Scope 1. Quarries are rehabilitated at the end of their lifetime to prevent any further environmental damage and, as such, no waste remains. |
| Business travel | $KtCO_2eq$ | GHG emissions from business travel are calculated using a supplier-based method, where the data are shared directly by Imerys suppliers. Emissions are calculated on a well-to-wheel basis. |

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| Employee Commuting | $KtCO_2eq$ | Following the discontinuation of the GHG Protocol's "Scope 3 Evaluator", a new methodology was developed in 2024 by Imerys to estimate 2023 Scope 3 employee commuting emissions, based on actual commuting habits of Imerys' employees (distance, transportation mode and number of commuting days per year).<br><br>An employee commuting survey was sent to a sample of employees based in 10 countries which represent 77% of Imerys' total headcount. Based on the survey response rate per country, results were then extrapolated to account for 100% of the Group's headcount. Country-specific emission factors were used for each transportation mode (in $gCO_2eq$/passenger-km). |
| Downstream transportation and distribution | $KtCO_2eq$ | All transportation modes within Imerys downstream value chain are included: bulk shipping, container shipping, road, intermodal (road + train) and train. All GHG emissions related to transportation are calculated on a well-to-wheel basis. Transportation is considered from Imerys' gate to the customer's gate. Emissions from distribution, including warehouses, are also included under this category.<br><br>Transportation and distribution emissions are calculated using a distance (km) and quantity-based method (tonnage), and specific emission factors according to the selected transportation mode, products transported and geographical location. Emission factors are obtained from the following sources: Ecoinvent 3.9.1 2021, EcoTransIT, University of Carnegie Mellon methodology EIOLCA and CERDI. Google maps is used to calculate the distances. |
| Processing of sold products | $tCO_2eq$ | Screening only considered processing steps that are required to obtain the right properties (mainly thermal expansion, spray drying & firing); further processes of finished products (composed of many other ingredients) that are not directly linked to Imerys minerals are excluded. In very specific applications where further processing is known, assumptions have been made to confirm that it is not significant, compared to other Scope 3 categories, based on Life Cycle Assessment studies performed by Imerys. Further processing stage is generally not significant compared to cradle to gate inventory, except in a few cases that are listed below:<br><br>Perlite used in filtration & Building materials, expanded by customers<br><br>Minerals (Kaolin, Feldspar, Ball clay, Ground Calcium Carbonate) used in ceramics<br><br>Refractory aggregates used in refractory bricks, with thermal processing by brick manufacturers<br><br>Ground calcium carbonates and other minerals with carbonate content (such as clays that could contain up to 2.5% of carbonates) are used in ceramic applications |
| Use of sold products | $tCO_2eq$ | Imerys products are inert materials, used as components and/or additives in final products and applications. As they are not combusted or chemically/ physically transformed (they are not feedstocks) and they are not consumed during the processing stages, they do not generate direct GHG emissions during use phases. Direct use phase emissions are equal to 0. |
| End of life treatment of sold products | $tCO_2eq$ | Process aids (filtration) are the only intermediate sold products in Imerys' portfolio, i.e. they are the only products that are disposed of right after being used. An estimate of their end-of-life emissions has been calculated using internal Life Cycle Assessment data. For minerals used as raw materials, blended and integrated into a final product, which are inseparable from other materials, the following market / applications were considered to assess the % of recycling according to a recent study published by IMA (Recycling of industrial mineral applications Contribution to circular economy - IMA Europe - September 2023): paper & board, plastics & rubber, paint & coating, ceramics, building products, refractory, abrasives.<br><br>Minerals that are entirely consumed during the use phase have no end-of-life treatment.<br><br>End of life of packaging of sold products is also included, by considering the average weight of packaging units and the composition and the emission factor given by Ecoinvent database for packaging materials. |
| Investments | $tCO_2eq$ | This category includes emissions of Joint Ventures (JVs). Emissions data were provided directly by the Joint Venture companies and allocated according to Imerys' share for each given JV. |

## Calculation methodology of indicators related to ESRS E2 - Pollution

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| Environmental management maturity indicator | Percentage | This metric measures Imerys' commitment to act as a responsible environmental steward by assessing environmental risks and continually improving control measures to reduce adverse environmental impacts, maximizing the efficient use of natural resources and conserving and creating biodiversity value.<br><br>Environmental Management requirement are defined by Imerys policies and measured by the environmental maturity matrix, which is based on leading international environmental standards. |
| Air emission management plan indicator | Percentage | To address air emissions, Imerys has set a target for 2025, prioritizing sites that exceed the threshold for SOX and NOX emissions. The objective is to align emissions with E-PRTR thresholds for SOx, NOx, CO, NM VOC, and PM10. By the end of 2025, all priority sites must establish specific air emission management plans to mitigate pollution risks. |
| **Air emissions** | | |
| Total SOx emissions | Tonnes | The Group's SOx emissions from fuels are automatically calculated monthly using fuel consumption data and emission factors from the EPA AP 42 database. SOx emissions can also be reported manually at the site level, where they are calculated based on the sulfur content of raw materials, additives, and process conditions, such as the desulfurization rate. As a best practice, continuous monitoring of SOx emissions at all points of rejection is recommended to ensure accurate tracking and effective management. |
| Total NOx emissions | Tonnes | The Group's NOx emissions from fuels are automatically calculated monthly using fuel consumption data and emission factors from the EPA AP 42 database. NOx emissions can also be reported manually at the site level, where they are calculated based on the nitrogen content of raw materials, additives, and process conditions. As a best practice, continuous monitoring of NOx emissions at all points of rejection is recommended to ensure accurate tracking and effective management. |
| **Environmental incidents** | | |
| Number of Level 4 & 5 environmental incidents | Number | This metric reflects the number of Level 5 environmental incidents, which correspond to long-term environmental harm and severe breaches of Group standards, as well as Level 4 incidents, which involve medium-term environmental harm and repeated breaches of Group standards. |

## Calculation methodology of indicators related to ESRS E3 - Water resources

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| **WATER REPORTING** | | |
| Water reporting progress indicator (for priority sites) | million m³ | For each priority site, a mark out of 100% is awarded based on two criteria:<br><br>Water reporting and water balance validity (75% of the overall score)<br><br>The new site-level reporting requirements cover a list of 5 macro-indicators.<br><br>40% is awarded if all the indicators on the list are reported by the site (8%/indicator)<br><br>10% is granted when the site provides an explanation on the significant gaps between the actual and the past reporting campaigns (maximum score: 50%)<br><br>50% is awarded if the difference between water inflows and outflows is inferior to 10%, or if inferior to 20% with a valid explanation of the water unbalance.<br><br>Water quality reporting (25% of the overall score)<br><br>The new site-level reporting requirements cover a list of 3 quality parameters (Total suspended solids, pH and Temperature)<br><br>All points are granted if at least 50% of the priority sites and sites in water stress 5, that discharge water to the environment, comply with the water quality reporting. |
| **WATER WITHDRAWALS** | | |
| Total operational water withdrawals | million m³ | Quantity of water supplied by a third party or withdrawn from the environment that enters the operational water system and supplies operations.<br><br>At Imerys, operational water withdrawals are split in the following categories, according to the origin of the water: from groundwater, from suppliers, from surface water, from rainwater, from seawater or from other sources (such as wastewater obtained from another organization).<br><br>Imerys applies the definition and the recommendation of the ICMM standard.<br><br>Operational water withdrawal volumes are quantified based on suppliers invoices, water meters, nominal pump capacities and running hours when not equipped with flowmeters. Rainwater is estimated based on local hydrological models, taking into account direct interception of rainwater by operational water stores, and indirect streams such as runoffs converging to these facilities, considering sub-catchment area and soil occupation. |

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| Water withdrawn from groundwater | million m³ | This water refers to the water from wells, boreholes or other systems for extracting water from beneath the surface of the ground. In the case of aquifer interception, the upwelling of water at the bottom of the pit are considered as groundwater. This flow falls in this category only when this water is used for the operations and/or quarry tasks (such as dust management, maintenance, vehicle washing). Entrained water in the ore (natural moisture) belongs to this category as well.<br><br>Water volumes from groundwater are either measured by water meters, flow meters or nominal pump capacities and running hours. In some specific cases, hydrogeologic surveys are conducted to evaluate the water flow of an intercepted groundwater table when used in the operations. For the case of entrained water in the ore, the volume of water is estimated based on moisture content measurements of representative samples of ore and the quantity of ore extracted and entering the production plant. |
| Water withdrawn from suppliers | million m³ | This water refers to the water obtained from water suppliers, local governments, water utilities or private water companies used in offices, facilities (e.g. drinking water from municipal water supply network) or operations.<br><br>Water volumes from suppliers are quantified based on water meters, suppliers invoices, when supplied via pipelines or in bottles, or differential weighting when transported via water trucks. |
| Water withdrawn from surface water | million m³ | This water refers to the water taken from rivers, lakes, ponds, springs, streams, or other water that naturally occurs on the Earth's surface (as opposed to water that is in the ground) with the purpose to sustain operations or be used in tasks.<br><br>Water volumes from surface water are either measured by water meters, flow meters or nominal pump capacities and running hours. |
| Water withdrawn from rainwater | million m³ | This water refers to natural precipitation and runoff that accumulate in active/inactive pits and operational water stores intended to supply the operations and tasks<br><br>Operational water withdrawals from rainwater (precipitation and runoffs) are estimated from sub-catchment basins delimitations from the water drainage map and are estimated according to weather data from stations near the site (within a maximum radius of 20km from the site). |
| **Water withdrawn from other sources** | million m³ | Some Imerys operations may obtain water from sources other than those listed above. For example, an operation may obtain wastewater from another organization.<br><br>Water volumes from other sources are either measured by water meters, flow meters or nominal pump capacities and running hours. |
| **WATER CONSUMPTION** | | |
| Total water consumption | million m³ | The amount of water drawn into the boundaries of the undertaking (or facility) and not discharged back to the environment or a third party, such as water evaporation, either forced or natural, end-product moisture, losses.<br><br>Water consumption is estimated from the water balance, consumption being the difference of water withdrawal and water discharge, that applies for simple operations with limited natural water flow contribution. Consumption is quantified at process scale, based on mass balance of consumptive process units and moisture content measures. |
| Total water consumption in areas at water risk, including areas of extremely high water stress | million m³ | Imerys defines areas of extremely high water stress as regions where the ratio of total surface and groundwater withdrawals to available renewable water is greater than 80% in the WWF Water Risk Filter (WRF). |
| **OTHER METRICS** | | |
| Total water stored | million m³ | Water storage is purpose built, artificial structures, within the site boundaries, intended to collect or hold operational water for its further use in the operations. Water stores are closed reservoirs, sediment ponds for water recycling, disused pits, tailing storage facilities.<br><br>The volume of large water storage facilities, such as tailings or disused pits is estimated from bathymetric surveys or computer-based height-volume model from historical topographical data and reference surface level. The volume of smaller water storage facilities are based on geometrical model approach and water level readings (sensor, level gauge, visual reference point). |
| Total water recycled and reused | million m³ | Water and wastewater (treated or untreated) that has been used more than once before being discharged from the Group or shared facilities' boundary, so that water demand is reduced. This may be in the same process (recycled) or in a different process within the same facility (own or shared with other undertakings) or in another of the undertaking's facilities (reused).<br><br>Water volumes recycled are either measured by water meters, flow meters or nominal pump capacities and running hours. |
| Water intensity of revenue | m³/€ million | This metric provides the relationship between a volumetric aspect of water and a unit of activity (products, sales, etc.) created. |

## Calculation methodology of indicators related to ESRS E4 - Biodiversity

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| Impact on biodiversity reduction indicator by fulfilling our Act4nature commitments. | Percentage | This metric is a composite measure designed to assess and reduce the company's impact on biodiversity through two key components:<br><br>Act4nature Commitments 2020-2024 (60% weighting):This component evaluates the progress in implementing 23 specific actions grouped into four main areas: improving environmental strategy and scientific expertise, combating biodiversity loss, conducting biodiversity research, and raising awareness among stakeholders. The annual progress is calculated as a percentage of deployment for each action, which is then consolidated by topic to track overall advancement.<br><br>Biodiversity Audits on Priority Sites (40% weighting):This component focuses on conducting biodiversity audits on 20 priority sites, defined as:<br><br>a) Quarries extracting over 1 million tons annually, or<br><br>b) Sites within a 5km radius of sensitive areas (Protected IUCN areas of category I, II, or III, or biodiversity hotspots near protected IUCN areas of category IV).<br><br>The audits aim to evaluate the sites' maturity in biodiversity management and adapt local biodiversity action plans. Progress is measured annually based on the number of sites audited during the 2022-2025 period. |
| Number of Imerys' extractive sites located in proximity to sensitive areas (IUCN categories I, II, or III) | Number | IUCN areas refer to protected areas categorized by the International Union for Conservation of Nature (IUCN). It is defined as geographical space, recognized, dedicated and managed, through legal or other effective means, to achieve the long term conservation of nature with associated ecosystem services and cultural values.<br><br>IUCN Category I splits into two sub-categories with:<br><br>Ia: Strict Nature Reserve<br><br>Ib: Wilderness Area<br><br>IUCN Category II: National Park<br><br>IUCN Category III: Natural Monument or Feature<br><br>This metric is estimated on the number of Imerys' extractive sites that are located within a radius of 5 km in an area classified as IUCN category I, II or III. |
| Total disturbed surface of Imerys' extractive priority sites | Surface (hectare) | The surface areas considered altered relate to the properties used for extraction activities and for infrastructures connected to operations that are not currently being rehabilitated. These involve both surface areas being operated and surface areas where infrastructures have been installed for operation purposes. |
| Total rehabilitated surface of Imerys' extractive priority sites | Surface (hectare) | This refers to the surface areas that have been rehabilitated/restored. The total area that has been subjected to rehabilitation efforts following extraction activities, aiming to restore the land to its natural state or prepare it for other post-mining uses. Rehabilitation involves ecological restoration, re-vegetation, landscape reshaping and contamination remediation. As a general rule, these areas have received surface treatment (stabilization, collapse, cover with an arable layer and vegetation) and/or have been re-vegetated (the re-vegetated areas of rock piles are included). |

## Calculation methodology of indicators related to ESRS E5 - Circular economy

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| **MINERAL WASTE REPORTING** | | |
| Mineral waste reporting progress indicator | Percentage | Total percentage of requirements completed across fifteen priority sites. Including: mineral characterizations and spatial data, |
| GISTM compliance indicator across Imerys' tailing disposal facilities | Percentage | Total percentage of applicable auditable requirements completed across relevant sites. Including: Affected communities; Integrated knowledge base; Design Construction Operating Monitoring data; Management and governance; Emergency response and long term recovery; Public disclosure and access to information. |
| **INDUSTRIAL WASTE** | | |
| Total industrial waste | tonnes | Industrial wastes are the non-mineral wastes generated by Imerys activities, such as solvents, inks, plastic big bags, cardboards and wooden pallets. It excludes the wastes from production: overburden, mineral wastes, by-products, off-specifications. The reporting of this indicator is to measure and categorize waste generated by Imerys operations into hazardous, non-hazardous, recycled, and ultimate industrial waste. If some water containing liquid is counted as waste (rather than wastewater) according to regulations, the reported quantity excludes the water content. The reported quantity refers to the waste evacuated from operational sites within the calendar year. It does not include the waste stocked on sites for future disposal. |
| Non-recycled hazardous industrial waste | tonnes | Many Imerys operations generate waste that is classified as hazardous and regulated by national legislation. This type of waste requires specialized handling, including specific methods for transportation, treatment, storage, and disposal. The classification of hazardous waste can vary by country, so it's essential to consult the relevant definition in the jurisdiction where each Imerys operation is located.<br><br>The estimation of non-recycled hazardous industrial waste quantities is based on delivery notes |
| Recycled hazardous industrial waste | tonnes | This waste refers to the hazardous waste disposed of by the entity and recycled externally. The waste can then be reused as a raw material in another process or reused for another purpose. Incineration of waste that is used as fuel and composted waste should be considered as recycled waste.<br><br>The estimation of recycled hazardous industrial waste quantities is based on delivery notes. |
| Non-recycled non-hazardous industrial waste | tonnes | This waste refers to any industrial waste from an Imerys operation that is not hazardous waste. This includes all other forms of solid or liquid waste excluding wastewater.<br><br>The estimation of non-recycled non-hazardous industrial waste quantities is based on delivery notes. |
| Recycled non-hazardous industrial waste | tonnes | This waste refers to non-hazardous materials disposed of by the entity and recycled externally. Such waste can be repurposed as raw materials in other processes or reused for different applications. Notably, waste incinerated for fuel and composted materials are also classified as recycled waste.<br><br>The estimation of recycled non-hazardous industrial waste quantities is based on delivery notes. |
| Industrial waste intensity per net revenue | tonnes/€ million | This metric measures the quantity of industrial waste produced or each unit of net revenue earned. It helps to assess a company's efficiency in managing its waste output relative to its financial performance. |

## Calculation methodology of indicators related to ESRS S1 - Own Workforce

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| **HEALTH AND SAFETY INDICATORS** | | |
| Group Safety Culture Maturity | Number | The Group Safety Culture Maturity indicator is the average of the maturity levels obtained by each site based on the result of the self-assessment performed through the Group Safety Maturity Matrix by each site.The Group Safety Maturity Matrix is an Imerys tool developed internally considering internationally recognized standards for safety management and aligned with the fundamentals of the Imerys safety policies and procedures. It is used to conduct gap analyses of the sites maturity and drive their improvement plans in partnership with industrial teams and safety professionals. Since 2019, the occupational safety maturity are categorized using the matrix, from Level 1.0 to 4.0 as follow: Maturity Level 1 corresponds to [Reactive] level where Imerys Safety System is weak; Maturity Level 2 corresponds to [Planned] level where Imerys Safety System is basic, some essential requirements not yet implemented; Maturity Level 3 corresponds to [Proactive] level where Imerys Safety System is "fully implemented, employees are engaged and contribute actively"; Maturity Level 4 corresponds to [Best-in-class] level where Imerys system is implemented beyond Imerys minimum requirements and is a reference for best practices sharing |
| Occupational health action plan (OHAP) improvement rate | % | Occupational Health Action Improvement rate tracks sites annual actions focussed on worker health protection measures, with a minimum completion of 75% required year to year. This is the ratio of the actions completed / actions planed for the end of the reporting year. Actions may come from various sources; annual occupational health assessment (separate to the OHAP), exposure monitoring etc. Focussed on worker health protection measures in the workplace (physical, chemical and or biological hazards) |
| Number of safety alerts related to Significant Potential Incident (SPIs) | Number | Significant Potential Incidents (SPIs) refer to events or near-misses that, while they may not have resulted in serious harm or damage, had the potential to cause significant injury, environmental impact, or property damage. These are incidents that could have had severe consequences under slightly different circumstances. The concept of SPIs is an important part of Imerys' safety management system. By identifying and analyzing these incidents, the Group aims to prevent more serious accidents from occurring in the future. SPIs are typically reported, investigated, and analyzed with the same rigor as actual incidents. And the results of these analysis are shared within the group through Safety Alerts. This proactive approach helps Imerys to continuously improve its safety performance and reduce the risk of serious accidents. This metric is calculated as the number of SPIs Safety Alerts shared within the reporting year. |
| Visible Felt Leadership (VFL) | Number | Visible Felt Leadership refers to the practice of leaders demonstrating their commitment to safety through visible actions and behaviors that can be observed and felt by employees at all levels of the organization. VFL typically involves:<br><br>Leaders regularly visiting work sites and engaging directly with employees about safety issues. Demonstrating a personal commitment to safety through actions and decisions.Actively participating in safety initiatives and discussions. Recognizing and reinforcing good safety practices. Addressing safety concerns promptly and visibly. This metric refers to the number of leaders interactions recorded within the reporting year. |
| Behavior-Based Safety (BBS) | Number | Behavior-Based Safety is a key component of Imerys safety management system and overall safety culture. Behavior-Based Safety is an approach that focuses on identifying and promoting safe behaviors among employees to prevent accidents and injuries in the workplace. The BBS program at Imerys typically involves: Observing and analyzing workplace behaviors Providing immediate feedback on safe and at-risk behaviors Encouraging employees to actively participate in identifying and addressing safety concerns Promoting positive reinforcement for safe behaviors Developing action plans to address identified safety issues The goal of BBS is to create a proactive safety culture where employees are actively engaged in maintaining a safe work environment. By focusing on behaviors, the Group aims to prevent accidents before they occur and continuously improve safety performance. This metric refers to the number of BBS interactions between co-workers recorded within the reporting year. |
| Life-changing injuries | Number | A life-changing injury refers to a serious injury with permanent impact to the victim. The injury involves amputation, brain damage, loss of vision, severe burns resulting in major scarring, and permanent inability to use arm or leg (including hand and foot) normally. With respect to an amputation of part of a finger, the accident will be considered life-changing if it impacts the bone. An event which results in a Life Changing Injury, as detailed above, will be classified under this level, even if there was no lost day and the worker was back to his or her next scheduled shift. This metric is the number of work-related injuries resulting in a life changing consequence. |
| Lost-Time Accident rates (LTA) | Ratio | A Lost-Time Accident is a work-related accident or injury where the injured worker (employee, non-employee or other worker on site) cannot work on the next day after the injury occurred, during normal working hours, due to the injury suffered. A physician or other licensed health care professional provides certification that the accident victim is not fit for work. Lost-Time Accident (LTA) rate: (number of lost time accidents x 1,000,000)/number of hours worked. |
| Number of days lost due to work-related injuries, fatalities and ill health | Number | A day on which an Imerys Employee Worker, a non-Imerys Employee Worker or an Other Worker on site cannot work due to a work-related accident. Lost Days are counted from and including the day after the injury occurred until and including the last day of absence, and measured in calendar days, meaning days on which the affected individual is not scheduled for work (for example, weekends, public holidays) will count as Lost Days. The day on which the injury occurred is never counted as a Lost Day. In case of fatality, by convention, 365 Lost Work Days, or 366 for leap year, will be reported. This metric is the number of lost days recorded within the reporting year and measured separately for lost days associated to Injuries and lost days associated to occupational ill-health |
| Recordable work-related accidents rate | Ratio | The recordable work-related accidents rate is a measure of Fatalities, Lost Time Accidents (with and without Life Changing) and Non Lost Time Accidents (with and without restricted duties) related to the working hours. This metric, also called, Total Recordable Incident Rate (TRIR) is calculated by: (number of fatalities, lost time accidents and non-lost time accidents x 1,000,000)/number of hours worked. |

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| Worked hours | Number | This indicator includes all working hours including overtime, for which workers are paid, excluding Vacations/ Holidays, National Holidays or any other non-working days available under local benefits programs. It is obtained by the sum working hours reported by all the sites, for each type of worker categories, within the reporting year. The working hours are based on real working hours when available or on the best estimation made by the site according to the headcount and work planning / presence on site and local standards of working time, or by default on an average of 40 hours per week per full time worker present on site. |
| Recordable work-related ill health, subject to legal restrictions on the collection of data | Number | The notification of Illnesses that are or could be work-related can come from various sources depending on the country concerned. It may come through reports by affected people, compensation agencies or social security services, or healthcare professionals (internal or external). A reportable disease must be: diagnosed by a doctor (personal or Group doctor) and recognized as occupational illness by the local authorities or social security / compensation services or; falling under the minimum list of occupational illnesses to be recognized and reported as outlined in the ILO (International Labour Organization) List of Occupational Diseases. These include musculoskeletal disorders, skin and respiratory diseases, malignant cancers, diseases caused by physical agents (for example, noise-induced hearing loss, vibration-caused diseases), and mental illnesses (for example, anxiety, post-traumatic stress disorder). |
| **HUMAN RESOURCES INDICATORS** | | |
| Score of the Diversity, Equity & Inclusion Index | Percentage | Imerys' Diversity, Equity and Inclusion Index is a composite metric developed to track diversity, equity and inclusion in the areas of gender balance, pay equity, nationality, disability, as well as engagement scores deriving from employee engagement surveys. It is composed of five equally weighted metrics (20% each) and can result in a score ranging from 0 to +100. The mid-term target for the Group is to increase the score of the Diversity, Equity & Inclusion Index to 100% by the end of 2025. |
| Number of women Board members | Number of women | Number of women Board members as at December 31 |
| Percentage of women Board members | Percentage | [Total of women Board member / Total Board members] x 100 |
| Number of women at top management level | Number of women | It includes not only Executive Committee members but also Senior Management roles. |
| Percentage of women at top management level | Percentage | [Total women at top management level / Total employees at top management level] x 100 |
| Number of women Executive Committee members | Number of women | Number of women Executive Committee members as at December 31 |
| Percentage of women Executive Committee members | Percentage | [Number of women Executive Committee Members / Total Executive Committee Members (including the CEO)] x 100 |
| Number of women in Senior Management roles | Number of women | Number of women that directly reports to Executive Committee members (excluding assistants/secretaries, etc.) or directly reports to the Chief Information Officer or Business Area Purchasing Directors. |
| Percentage of women in senior management roles | Percentage | [Number of women in senior management roles / Total number of senior managers] x 100 |
| Number of women in manager/expert/ professional roles | Number of women | Employees on positions requiring professional or technical qualification (university degree or equivalent experience), assorted with supervisory and/or expertise responsibilities. |
| Percentage of women in manager/ expert/professional roles | Percentage | [Number of women in manager/expert/professional roles / Total number of manager/expert/professional] x 100 |
| Number of women in Paraprofessional roles | Number of women | Number of women not included in the categories: Executive Committee members, Senior Managers or Managers / Experts / Professional. |
| Percentage of women in Paraprofessional roles | Percentage | [Number of women in Paraprofessional roles / Total number of Paraprofessional roles] x 100 |
| Number of women in the Group | Number of women | This indicator shows the number of women in the Group as at December 31. |
| Percentage of women in the Group | Percentage | [Total women employees / Total employees] x 100 |

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| Percentage of employees with less than 30 years | Percentage | [Total employees with less than 30 years / Total employees] x 100 |
| Percentage of employees from 30 to 50 years | Percentage | [Total employees from 30 to 50 years / Total employees] x 100 |
| Percentage of employees over 50 years | Percentage | [Total employees over 50 years / Total employees] x 100 |
| Number of employees with a disability | Number of employees | It indicates the number of employees with a least one type of disability of which the recognition, by the relevant country authorities, is still effective as at December 31. |
| Number of women employees with a disability in the Group | Number of women | Number of women included in the number of employees with a disability. |
| Number of men employees with a disability in the Group | Number of men | Number of men included in the number of employees with a disability. |
| Percentage of Registered headcount with a disability | Percentage | [Total employees with a disability / Total employees] x 100 |
| Percentage of persons with disabilities in the Group subject to legal restrictions on the collection of data | Percentage | The number of employees with a disability versus the total number of headcount in the countries the Group has presence and it is legally allowed to collect information on employees' disabilities |
| Number of trained employees | Number | Number of training hours (whether it is a requirement of the country labor Law or a company decision to update/upgrade the technical or managerial skills of their employees through a formalized curriculum or program (with attendance register); in other words, in-house/external training sessions during working hours, excluding information session or informal meetings (e.g.welcome session) N.B.: EHS training hours included Calculation: Number of training hours taken during the month X number of attendees. |
| Number of training hours by year | Number | Number of training hours (whether it is a requirement of the country labor Law or a company decision to update/upgrade the technical or managing skills of their employees through a formalized curriculum or program (with attendance register); in other words, in-house/external training sessions during working hours, excluding information session or informal meetings (e.g.welcome session) N.B.: EHS training hours included |
| Collective bargaining coverage | Percentage | [Number of employees covered at least by one collective bargaining agreements as at December 31 / Total employees] x 100 |
| Number of employee (headcount) | Number | Total number of Imerys employees in headcount as at December 31 who perform work for any of the Imerys' entities. It includes permanent, temporary and non-guaranteed hours employees. |
| Number of permanent employees | Number | Total number of employees registered in the Imerys headcount on December 31, employed under a contract of indefinite duration and directly paid by one of the Imerys companies. Full-time and part-time workers are included in permanent employees, except non-guaranteed hours employees. |
| Number of temporary employees | Number | Total number of employees registered in the Imerys headcount on December 31, employed under a fixed-term contract / agreement and directly paid by one of the Imerys companies. Seasonal, full-time and part-time workers are included in non-permanent employees, except non-guaranteed hours employees. As per the regulation of users country, the apprentices are included in the non-permanent employees. |
| Number of non-guaranteed hours employees | Number | Non-guaranteed hours employees are employed directly by an Imerys company without a guarantee of a minimum or fixed number of working hours. The employee may need to make themselves available for work as required, but Imerys is not contractually obliged to offer the employee a minimum or fixed number of working hours per day, week, or month. |
| Average number of employees (Headcount) | Number | Average of the total number of Imerys headcount at the end of each month of the year. |
| Non-employee workers in Imerys' workforce (Full-Time Equivalent) | Number | Number of total annual hours worked by non-employees, including self-employed workers and temporary agency workers / monthly statutory hours of a permanent employee in the respective countries / 12 months |

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| Number of employees who have left Imerys during the year | Number | Number of permanent employees who leaves voluntarily or due to dismissal, retirement or death during the year. |
| Rate of employee turnover | Percentage | Number of permanent employees who have left Imerys during the year / average permanent headcount of the year. |
| Number of confirmed incidents of discrimination (including harassment) | Number | Number of whistleblowing reports raised during the year regarding discrimination or harassment which have been confirmed after investigation |
| Number of confirmed other workforce-related complaints | Number | Number of whistleblowing reports raised during the year regarding allegations related to human resources matter, other than discrimination and harassment, which have been confirmed after investigation |

## Calculation methodology of indicators related to ESRS S2 - Workers in the value chain

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| Supplier sustainability rating indicator | Percentage | This metric measures Imerys' commitment in ensuring exemplary Business Conduct by maintaining the highest standard of business ethics and compliance, respecting and implementing fair operating practices, ensuring responsible purchasing.<br>This program is based on the assessment of supplier sustainability performance based on a comprehensive review of human rights, labor, ethics, environmental and supply chain management practices. |

## Calculation methodology of indicators related to ESRS S3 - Affected communities

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| Stakeholder engagement progress indicator (for priority sites) | Percentage | Percentage of priority sites having a stakeholder engagement plan (step 1 and Step 2) completed |
| Sites with stakeholder mapping | Percentage | Percentage of sites having a stakeholder engagement plan (step 1 and Step 2) completed |
| Sites with a community grievance mechanism | Percentage | Percentage of sites having a community grievance mechanism |
| Donations | Monetary | This metrics reports the amount of donations approved during the year |
| Employees included in the volunteering pilot program | Number | Number of employees (from the 5 pilot countries: France, US, UK, Switzerland and Singapore) having access to the volunteering pilot program |
| Severe human rights issues and incidents connected to affected communities | Number | Number of whistleblowing reports raised during the year regarding allegations related to severe human rights issues and incident connected to affected communities, which have been confirmed after investigation |

## Calculation methodology of indicators related to ESRS S4 - Consumers and end-users

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| Products in Application Combinations (PAC) assessment indicator | Percentage | This indicator measures the progress of the evaluation of the Group existing product portfolio using the SustainAgility Solutions Assessment (SSA). The SustainAgility Solutions Assessment (SSA) has been designed in line with the World Business Council for Sustainable Development (WBCSD) guidelines for Portfolio Sustainability Assessments. The Group existing portfolio is read as Product in Application Combination (PAC) and each PAC is then given a rating according that is meets or not specific sustainability criteria. The metrics is a ratio of yearly revenue generated by the PAC rated according to SSA over the annual turnover of the Group. |
| Group New Product Developments SustainAgility scoring indicator | Percentage | This indicator evaluates Imerys' dedication to innovate and grow the Group portfolio by assessing the sustainability of new products, processes and services in order to deliver sustainable solutions for society. This metric tracks the percentage of the Group's new products that achieved one of the top two categories in the four-tier SustainAgility Solutions Assessment framework, qualifying as a "SustainAgility Solution». |
| Revenue by SSA Matrix Categories | € million | Revenue by SSA refers to the proportion of the Group's revenue attributed to Products in Application Combinations that have been assessed using the SSA methodology. This categorization is based on specific sustainability criteria, allowing Imerys to evaluate and classify its portfolio accordingly. The revenue classification is derived from the SSA methodology, which assesses the sustainability performance of Product Application Combinations (PACs) |

## Calculation methodology of indicators related to ESRS G1 - Business conduct

| Metric | Unit | Calculation methodology, significant assumptions, and contextual information |
|---|---|---|
| Group's external sustainability rating progress indicator | Number | Imerys is committed to exemplary business conduct, ensuring ethical behavior and fair operating practices across all Group activities. In the spirit of continuous improvement, Imerys assesses its sustainability policies, actions and results annually through a comprehensive EcoVadis sustainability assessment, sharing these results openly with internal and external stakeholders. |
| **Incidents of corruption and bribery** | | |
| Number of convictions for violation of anti-corruption and anti-bribery laws | Number | This metric shows the number of convictions raised during the year for violation of anti-corruption and anti-bribery laws in the Group. |
| **Political influence and lobbying activities** | | |
| Amount of fines for violation of anti-corruption and anti-bribery laws | Monetary (€) | This metric reports the amount of fines regarding allegations for violation of anti-corruption and anti-bribery laws during the year. |
| **Payment practices** | | |
| Average number of days to pay invoice | days | This metric indicates the average number of days to pay invoice from date when contractual or statutory term of payment starts |

# 1.7. Cross-reference tables

## 1.7.1. Datapoints derived from other EU legislation [IRO-2]

| Disclosure Requirement | Data point | Regulatory framework | Reference | Chapter & Section |
|---|---|---|---|---|
| ESRS 2 GOV-1 | Board's gender diversity paragraph 21 (d) | SFDR | Indicator number 13 of Table #1 of Annex I | Chapter 4, section 4.1.1 |
| | | Benchmark regulation | Commission Delegated Regulation (EU) 2020/181627, Annex II | |
| ESRS 2 GOV-1 | Percentage of board members who are independent paragraph 21 (e) | Benchmark regulation | Delegated Regulation (EU) 2020/1816, Annex II | Chapter 4, section 4.1.1 |
| ESRS 2 GOV-4 | Statement on due diligence paragraph 30 | SFDR | Indicator number 10 Table #3 of Annex I | Section 1.1.2.4 |
| ESRS 2 SBM-1 | Involvement in activities related to fossil fuel activities paragraph 40 (d) i | SFDR | Indicators number 4 Table #1 of Annex I | - |
| | | Pillar 3 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/245328 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk | |
| | | Benchmark regulation | Delegated Regulation (EU) 2020/1816, Annex II | |
| ESRS 2 SBM-1 | Involvement in activities related to chemical production paragraph 40 (d) ii | SFDR | Indicator number 9 Table #2 of Annex I | - |
| | | Benchmark regulation | Delegated Regulation (EU) 2020/1816, Annex II | |
| ESRS 2 SBM-1 | Involvement in activities related to controversial weapons paragraph 40 (d) iii | SFDR | Indicator number 14 Table #1 of Annex I | - |
| | | Benchmark regulation | Delegated Regulation (EU) 2020/181829, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | |
| ESRS 2 SBM-1 | Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv | Benchmark regulation | Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II | - |
| ESRS E1-1 | Transition plan to reach climate neutrality by 2050 paragraph 14 | EU Climate Law | Regulation (EU)2021/1119, Article 2(1) | Section 1.2.2.4 |
| ESRS E1-1 | Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g) | Pillar 3 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Section<br>1.2.2 |
| | | EU Climate Law | Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to(g), and Article 12.2 | |
| ESRS E1-4 | GHG emission reduction targets paragraph 34 | SFDR | Indicator number 4 Table #2 of Annex I | Section 1.2.2.4 |
| | | Pillar 3 | Article 449a Regulation(EU) No 575/2013; Commission Implementing Regulation(EU)2022/2453 Template 3:Banking book –Climate change transition risk: alignment metrics | |
| | | Benchmark regulation | Delegated Regulation (EU)2020/1818,Article 6 | |
| ESRS E1-5 | Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38 | SFDR | Indicator number 5 Table #1 and Indicator n. 5 Table#2 of Annex I | Section<br>1.2.2.6 |
| ESRS E1-5 | E1-5 Energy consumption and mix paragraph 37 | SFDR | Indicator number 5 Table #1 of Annex I | Section<br>1.2.2.6 |
| ESRS E1-5 | Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43 | SFDR | Indicator number 6 Table #1 of Annex I | Section<br>1.2.2.6 |
| ESRS E1-6 | Gross Scope 1, 2, 3and Total GHG emissions paragraph 44 | SFDR | Indicators number 1 and 2 Table #1 of Annex I | Section<br>1.2.2.6 |
| | | Pillar 3 | Article 449a; Regulation(EU) No 575/2013;Commission Implementing Regulation (EU)2022/2453 Template 1:Banking book –Climate change transition risk:Credit quality of exposures by sector, emissions and residual maturity | |

| Disclosure Requirement | Data point | Regulatory framework | Reference | Chapter & Section |
|---|---|---|---|---|
| | | Benchmark regulation | Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1) | |
| ESRS E1-6 | Gross GHG emissions intensity paragraphs 53 to 55 | SFDR | Indicators number 3 Table #1 of Annex 1 | Section 1.2.2.6 |
| | | Pillar 3 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | |
| | | Benchmark regulation | Delegated Regulation (EU) 2020/1818, Article 8(1) | |
| ESRS E1-7 | GHG removals and carbon credits paragraph 56 | EU Climate Law | Regulation (EU)2021/1119,Article 2(1) | Section 1.2.2.6 |
| ESRS E1-9 | Exposure of the benchmark portfolio to climate-related physical risks paragraph 66 | Benchmark regulation | Delegated Regulation (EU)2020/1818, Annex II Delegated Regulation (EU)2020/1816, Annex II | - |
| ESRS E1-9 | Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66(a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c). | Pillar 3 | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk. | Section 1.2.2.7 |
| ESRS E1-9 | Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c) | Pillar 3 | Article 449a Regulation(EU) No575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral | - |
| ESRS E1-9 | Degree of exposure of the portfolio to climate-related opportunities paragraph 69 | Benchmark regulation | Delegated Regulation (EU) 2020/1818, Annex II | - |
| 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 | SFDR | Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1 | Section 1.2.3.5 |
| ESRS E3-1 | Water and marine resources paragraph 9 | SFDR | Indicator number 7 Table #2 of Annex 1 | Section 1.2.4.2 |
| ESRS E3-1 | Dedicated policy paragraph 13 | SFDR | Indicator number 8 Table 2 of Annex 1 | Section 1.2.4.2 |
| ESRS E3-1 | Sustainable oceans and seas paragraph 14 | SFDR | Indicator number 12 Table #2 of Annex 1 | - |
| ESRS E3-4 | Total water recycled and reused paragraph 28 (c) | SFDR | Indicator number 6.2 Table #2 of Annex 1 | Section 1.2.4.5 |
| ESRS E3-4 | Total water consumption in $m^3$ per net revenue on own operations paragraph 29 | SFDR | Indicator number 6.1 Table #2 of Annex 1 | Section 1.2.4.5 |
| ESRS 2- IRO 1 - E4 | paragraph 16 (a) i | SFDR | Indicator number 7 Table #1 of Annex 1 | Section 1.2.5.1 |
| ESRS 2- IRO 1 - E4 | paragraph 16 (b) | SFDR | Indicator number 10 Table #2 of Annex1 | Section 1.2.5.1 |
| ESRS 2- IRO 1 - E4 | paragraph 16 (c) | SFDR | Indicator number 14 Table #2 of Annex 1 | Section 1.2.5.1 |
| ESRS E4-2 | Sustainablel and /agriculture practices or policies paragraph 24 (b) | SFDR | Indicator number 11 Table #2 of Annex 1 | - |
| ESRS E4-2 | Sustainable oceans/ seas practices or policies paragraph 24 (c) | SFDR | Indicator number 12 Table #2 of Annex1 | - |
| ESRS E4-2 | Policies to address deforestation paragraph 24 (d) | SFDR | Indicator number 15 Table #2 of Annex1 | - |
| ESRS E5-5 | Non-recycled waste paragraph 37 (d) | SFDR | Indicator number 13 Table #2 of Annex1 | Section 1.2.6.5 |
| ESRS E5-5 | Hazardous waste and radioactive waste paragraph 39 | SFDR | Indicator number 9 Table #1 of Annex 1 | Section 1.2.6.5 |
| ESRS 2- SBM3 - S1 | Risk of incidents of forced labour paragraph 14 (f) | SFDR | Indicator number 13 Table #3 of Annex I | Section 1.3.1.1 |

| Disclosure Requirement | Data point | Regulatory framework | Reference | Chapter & Section |
|---|---|---|---|---|
| ESRS 2- SBM3 - S1 | Risk of incidents of child labour paragraph 14 (g) | SFDR | Indicator number 12 Table #3 of Annex I | Section 1.3.1.1 |
| ESRS S1-1 | Human rights policy commitments paragraph 20 | SFDR | Indicator number 9 Table #3 and Indicator number 11Table #1 of Annex I | Section 1.3.1.7 |
| ESRS S1-1 | Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 21 | Benchmark regulation | Delegated Regulation (EU)2020/1816,Annex II | Section 1.3.1.7 |
| ESRS S1-1 | Processes and measures for preventing trafficking in human beings paragraph 22 | SFDR | Indicator number 11Table #3 of Annex I | Section 1.3.1.7 |
| ESRS S1-1 | Workplace accident prevention policy or management system paragraph 23 | SFDR | Indicator number 1 Table #3 of Annex I | Section 1.3.1.3 |
| ESRS S1-3 | Grievance/complaints handling mechanisms paragraph 32 (c) | SFDR | Indicator number 5 Table #3 of Annex I | Section 1.3.1.3 |
| ESRS S1-14 | Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c) | SFDR | Indicator number 2 Table #3 of Annex I | Section 1.3.1.3 |
| | | Benchmark regulation | Delegated Regulation (EU)2020/1816,Annex II | |
| ESRS S1-14 | Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e) | SFDR | Indicator number 3 Table #3 of Annex I | Section 1.3.1.3 |
| ESRS S1-16 | Unadjusted gender pay gap paragraph 97 (a) | SFDR | Indicator number 12 Table #1 of Annex I | - |
| | | Benchmark regulation | Delegated Regulation (EU)2020/1816,Annex II | |
| ESRS S1-16 | Excessive CEO pay ratio paragraph 97 (b) | SFDR | Indicator number 8 Table #3 of Annex I | Section 1.3.1.6 |
| ESRS S1-17 | Incidents of discrimination paragraph 103 (a) | SFDR | Indicator number 7 Table #3 of Annex I | Section 1.3.1.6 |
| ESRS S1-17 | Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a) | SFDR | Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I | Section 1.3.1.6 |
| | | Benchmark regulation | Delegated Regulation (EU)2020/1816, Annex II Delegated Regulation (EU)2020/1818 Art 12(1) | |
| ESRS 2- SBM3 – S2 | Significant risk of child labour or forced labour in the value chain paragraph 11 (b) | SFDR | Indicators number 12 and n. 13 Table #3 of Annex I | - |
| ESRS S2-1 | Human rights policy commitments paragraph 17 | SFDR | Indicator number 9 Table #3 and Indicator n. 11Table #1 of Annex1 | Section 1.3.2.2 |
| ESRS S2-1 | Policies related to value chain workers paragraph 18 | SFDR | Indicator number 11 and n. 4 Table #3 of Annex 1 | Section 1.3.2.2 |
| ESRS S2-1 | Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19 | SFDR | Indicator number 10 Table #1 of Annex1 | Section 1.3.2.2 |
| | | Benchmark regulation | Delegated Regulation (EU)2020/1816,Annex II Delegated 12 (1)Regulation (EU)2020/1818, Art | |
| ESRS S2-1 | Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8,paragraph 19 | Benchmark regulation | Delegated Regulation (EU)2020/1816, Annex II | Section 1.3.2.2 |
| ESRS S2-4 | Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36 | SFDR | Indicator number 14 Table #3 of Annex1 | - |
| ESRS S3-1 | Human rights policy commitments paragraph 16 | SFDR | Indicator number 9 Table #3 of Annex 1and Indicator number 11 Table#1 of Annex 1 | Section 1.3.3.3 |
| ESRS S3-1 | Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17 | SFDR | Indicator number 10Table #1 Annex 1 | Section 1.3.3.3 |
| | | Benchmark regulation | Delegated Regulation (EU)2020/1816,Annex II Delegated Regulation (EU)2020/1818, Art12 (1) | |
| ESRS S3-4 | Human rights issues and incidents paragraph 36 | SFDR | Indicator number 14 Table #3 of Annex 1 | section 1.3.3.7 |

| Disclosure Requirement | Data point | Regulatory framework | Reference | Chapter & Section |
|---|---|---|---|---|
| ESRS S4-1 | Policies related to consumers and end-users paragraph 16 | SFDR | Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1 | section 1.3.4.2 |
| ESRS S4-1 | Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17 | SFDR | Indicator number 10 Table #1 of Annex 1 | - |
| | | Benchmark regulation | Delegated Regulation (EU)2020/1816,Annex II Delegated Regulation (EU)2020/1818, Art12 (1) | |
| ESRS S4-4 | Human rights issues and incidents paragraph 35 | SFDR | Indicator number 14 Table #3 of Annex1 | - |
| ESRS G1-1 | United Nations Convention against Corruption paragraph 10 (b) | SFDR | Indicator number 15 Table #3 of Annex1 | - |
| ESRS G1-1 | Protection of whistle-blowers paragraph 10 (d) | SFDR | Indicator number 6 Table #3 of Annex 1 | Section 1.4.1.3 |
| ESRS G1-4 | Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a) | SFDR | Indicator number 17 Table #3 of Annex 1 | Section 1.4.1.6 |
| | | Benchmark regulation | Delegated Regulation (EU)2020/1816,Annex II) | |
| ESRS G1-4 | Standards of anti-corruption and anti-bribery paragraph 24 (b) | SFDR | Indicator number 16 Table #3 of Annex 1 | Section 1.4.1.6 |

## 1.7.2. Cross-reference table for the global reporting initiative (GRI)

| | GRI | Section(s) andDisclosure requirement(s) |
|---|---|---|
| GRI 2 | General Disclosures | Section 1.1, [ESRS 2] |
| GRI 3 | Material Topics | Section 1.1.4.1 & 1.1.4.2, [ESRS 2 IRO-1 & SBM-3] |
| GR 14 | Mining Sector | Section 1.1.4.1 & 1.1.4.2, [ESRS 2 IRO-1 & SBM-3] |
| GRI 101 | Biodiversity | Section 1.2.5, [ESRS E4] |
| GRI 204 | Procurement Practices | Section 1.3.2.3 & 1.3.2.4, [ESRS S2-2 & S2-3] |
| GRI 205 | Anti-corruption | Section 1.4.1.6, [ESRS G1-4] |
| GRI 206 | Anti-competitive Behavior | Section 1.4.1.3, [ESRS G1-1] |
| GRI 301 | Materials | Section 1.2.6, [ESRS E5] |
| GRI 302 | Energy | Section 1.2.2.6, [ESRS E1-5] |
| GRI 303 | Water and Effluents | Section 1.2.4, [ESRS E3] |
| GRI 304 | Biodiversity | Section 1.2.5, [ESRS E4] |
| GRI 305 | Emissions | Section 1.2.5, [ESRS E1-6] |
| GRI 306 | Waste | Section 1.2.6.5, [ESRSE5-5] |
| GRI 308 | Supplier Environmental Assessment | Section 1.3.2, [ESRS S2] & vigilance plan Part II |
| GRI 401 | Employment | Section 1.3.2, [ESRS S2] |
| GRI 403 | Occupational Health and Safety | Section 1.3.1.3 [ESRS S1-1, S1-4, S1-5 & S1-14] |
| GRI 404 | Training and Education | Section 1.3.1.6, [ESRS S1-1, S1-4, S1-13] |
| GRI 405 | Diversity and Equal Opportunity | Section 1.3.1.5, [ESRS S1-, S1-4, S1-5, S1-9 & S1-12] |
| GRI 406 | Non-discrimination | Section 1.3.1.5, [ESRS S1-4] |
| GRI 407 | Freedom of Association and Collective Bargaining | Section 1.3.1.8 [ESRS S1-8] |
| GRI 408 | Child Labor | Section 1.3.1 [ESRS S1], 1.3.2 [ESRS S2] and vigilance plan Part II |
| GRI 409 | Forced or Compulsory Labor | Section 1.3.1 [ESRS S1], 1.3.2 [ESRS S2] and vigilance plan Part II |
| GRI 411 | Rights of Indigenous Peoples | Section 1.3.3.3, [ESRS S3-1] |
| GRI 413 | Local Communities | Section 1.3.3, [ESRS S3] |
| GRI 414 | Supplier Social Assessment | Section 1.3.2, [ESRS S2] |
| GRI 415 | Public Policy | Section 1.4.1.7, [ESRS G1-5] |

## 1.7.3. Cross-reference table for the task force on climate-related financial disclosures (TCFD)

| TCFD Recommendations | | Section(s)/Sub-section(s)/DRs |
|---|---|---|
| 1 | Governance | Section 1.2.2.1, ESRS 2 - GOV3 - E1 |
| 1.1 | Board oversight | Section 1.2.2.1, ESRS 2 - GOV3 - E1 |
| 1.2 | Management role | Section 1.1.2 |
| 2 | Strategy | Section 1.1.3 |
| 2.1 | Climate related risks | Section 1.2.2.3, ESRS 2 - SBM3 - E1 |
| 2.1.1 | Transition risks | Section 1.2.2.2, ESRS 2 - IRO1 - E1 |
| 2.1.1.2 | Technology | Section 1.2.2.2, ESRS 2 - IRO1 - E1 |
| 2.1.1.3 | Market | Section 1.2.2.2, ESRS 2 - IRO1 - E1 |
| 2.1.1.4 | Reputation | Section 1.2.2.2, ESRS 2 - IRO1 - E1 |
| 2.1.2 | Physical risks | Section 1.2.2.2, ESRS 2 - IRO1 - E1 |
| 2.1.2.1 | Acute | Section 1.2.2.2, ESRS 2 - IRO1 - E1 |
| 2.1.2.2 | Chronic | Section 1.2.2.2, ESRS 2 - IRO1 - E1 |
| 2.2 | Climate related opportunities | Section 1.2.2.3, ESRS 2 - SBM3 - E1 |
| 2.2.1 | Resource efficiency | Section 1.2.2.4, ESRS E1-1 & E1-4 |
| 2.2.2 | Energy source | Section 1.2.2.6, ESRS E1-5 |
| 2.2.3 | Products/services | Section 1.2.2.2, ESRS 2 - IRO1 - E1 |
| 2.2.4 | Markets | Section 1.2.2.4, ESRS E1-1 & E1-4 |
| 2.3 | Impacts on the organization | Section 1.2.2.3, ESRS 2 - SBM3 - E1 |
| 2.4 | Resilience of the organization | Section1.2.2.5, ESRS E1-3 & E1-4 |
| 3 | Risk management | Section 1.2.2.2, ESRS 2 - IRO1 - E1 |
| 3.1 | Organization for assessing risks | Section 1.2.2.2, ESRS 2 - IRO1 - E1 |
| 3.2 | Organization and processes for managing risks | Section 1.2.2.2, ESRS 2 - IRO1 - E1 |
| 3.3 | Integration in overall risk management | Section 1.1.4 |
| 4 | Metrics and targets | Section 1.2.2.6, ESRS E1-5, E1-6, E1-7 & E1-8 |
| 4.1 | Metrics used | Section 1.2.2.6, ESRS E1-5, E1-6, E1-7 & E1-8 |
| 4.2 | Scopes 1, 2 and 3 GHG emissions | Section 1.2.2.6, ESRS E1-6 |
| 4.3 | GHG emission targets | Section1.2.2.4, ESRS E1-4 |

# PART 2 VIGILANCE PLAN

In accordance with article L. 225-102-1 of the French Commercial Code, the Vigilance Plan (the "Vigilance Plan") aims to set out the reasonable measures of vigilance put in place within the Group to identify risks of and prevent severe impacts on human rights, fundamental freedoms, health and safety and the environment resulting from the activities of the Group, including all Group subsidiaries as defined in point II of article L. 233-16 of the French Commercial Code, as well as the activities of subcontractors and suppliers, in France and abroad, with which Imerys has an established commercial relationship, where such activities are linked to this relationship (hereafter collectively referred to as Suppliers).

This Vigilance Plan summarizes the key elements of the Group's "Duty of Care" program. The Group has established a Duty of Care policy setting out Imerys' approach to protecting human rights, fundamental freedoms, health and safety and the environment and the structure and functioning of its Duty of Care program. It provides guidance to Imerys employees regarding their Duty of Care responsibilities and identifies how Duty of Care is to be managed within the Group.

## 2.1. Governance

Every Imerys employees, officers and directors have a key role to play in preventing and detecting human rights, health and safety and environmental risks related to Imerys' operations and its Suppliers in their daily work. In addition, a clear allocation of responsibilities has been established to design, implement and monitor an adequate and effective Duty of Care program.

- Audit Committee: every year, the Audit Committee reviews the performance and effectiveness of the Duty of Care program through the Ethics Committee's Report.
- Executive Committee: the Executive Committee has established the Ethics Committee to assist the Executive Committee in ensuring the Group's operations are conducted ethically, in particular in accordance with Duty of Care regulations. It is regularly informed of the performance and effectiveness of the Duty of Care program by the Chair of the Ethics Committee.
- Ethics Committee: it is accountable for the design and monitoring of the Duty of Care program. This includes ensuring that the Duty of Care policy and related documents are adequate, monitoring the Duty of Care risk mapping, validating the Vigilance Plan, monitoring training plans and other awareness-raising measures, ensuring that sufficient human and financial resources are available to efficiently implement the program, assessing the performance and effectiveness of the program, and identifying new ideas to improve this program. The Ethics Committee reports on an annual basis to the Audit Committee of the Board of Directors.
- Antitrust & Compliance General Counsel: the Antitrust & Compliance General Counsel reports to the Group General Counsel & Group Secretary and is responsible for the Duty of Care program. This includes defining and rolling out the Duty of Care policy and related procedures, defining and implementing the Duty of Care objectives which are part of the ethics & compliance roadmap, monitoring training and communication plans, providing the Ethics Committee with indicators to assess the performance and effectiveness of the program. S/he is supported by the Group Chief Sustainability Officer, the Group Chief Human Resources Officer, the Group Health and Safety Vice President and the Group Sustainable Purchasing Director in the designing and monitoring of the Duty of Care program.
- Sustainable Purchasing Committee: it is responsible for ensuring the completion of the Duty of Care risk mapping of Suppliers and ensuring the development and implementation of the responsible purchasing program. The Committee is chaired by the Group Purchasing Vice President and is coordinated by the Group Sustainable Purchasing Director. The Group Chief Sustainability Officer, Antitrust & Compliance General Counsel, and Climate and Portfolio Vice president are part of this committee, who meet monthly, to steer the Responsible Purchasing program.

## 2.2. Duty of Care Risk Mapping Process

As part of its Vigilance Plan, the Group has established a specific risk mapping process to identify, assess and prioritize, human rights, health, safety and environmental risks within its operations and those of its subsidiaries as well as those of its Suppliers in different geographical areas, herein referred to as the "Duty of Care risk mapping process". The results of the Duty of Care risk mapping process are integrated as appropriate with the Group overall risk mapping as presented in Chapter 2, section 2.1 of the Universal Registration Document.

In 2018, Imerys drew up its first Duty of Care risk map. Between 2019 and 2021, using a regional "workshop technique", a full cycle of updates was completed covering all the regions in which the Group operates (Asia-Pacific, Europe 1 (European countries with CPI > 50), Europe 2 (European countries with CPI < 50), Middle East & Africa, North America, and South America). Thanks to these yearly regional workshops, all functions, business areas, levels in the hierarchy and countries in the region were duly represented.

In 2023 and 2024, the Group revised certain aspects of its Duty of Care risk mapping process to align with the requirements of the Corporate Sustainability Reporting Directive standards on impact materiality assessment, to increase the level of granularity of its risk map and involve more experts in the process. As a result the Duty of Care risk map was also updated in 2023 and 2024.

The Duty of Care risk map is based on a list of risk scenarios identifying actual or potential impacts on human rights, health, safety and the environment. This was reviewed centrally by the sustainability, compliance and responsible purchasing functions, and it reflects the list of sustainability matters covered by the CSRD. This Duty of Care risk register (covering impacts on human rights, health, safety and the environment) includes 41 potential risk scenarios related to Imerys' operations and 13 potential risk scenarios related to its suppliers.

The scenarios for operations are classified into six categories:

- working conditions: insecure employment, inadequate working time, inadequate wages, inadequate social dialogue, including collective bargaining, inadequate freedom of association, inadequate work-life balance;

- equal treatment: gender discrimination, non-development of employees skills, non-inclusion of persons with disabilities, violence and harassment, lack of diversity in the workplace,
- other human rights: child labor, forced labor, inadequate housing, inadequate facilities, non-protection of employee personal data;
- affected communities: negative impacts on safety, living conditions (water accessibility, food, housing) and property of local communities, negative impacts on land rights and land access restrictions (including resettlement), negative impacts on local communities related to security arrangements, violation of the civil and political rights among local communities, violation of the particular rights of indigenous people;
- health and safety: occupational illness, occupational injury;
- climate change and environment: climate change mitigation, climate change adaptation, pollution of air, pollution of water, water depletion, pollution of soil, pressure on biodiversity, impact/loss of biodiversity, production of mineral waste, industrial waste, inadequate management of substances of concern and inadequate management of substances of very high concern.

The scenarios for suppliers are classified into three categories:

- human rights: inadequate working conditions, discrimination and harassment, child labour, forced labour, inadequate access to water and sanitation (including inadequate housing);
- health and safety: occupational illness, occupational injury;
- climate change and environment: climate change, pollution of air, pollution of water, water depletion, loss of biodiversity, production of waste.

Following a “workshop technique”, as in past risk mappings, two sets of expert workshops covering all geographic areas where the Group operates were organized: the first to assess risks stemming from Imerys’ operations, the second to assess risks related to Imerys’ suppliers. The “operations workshop” brought together senior representatives from the Human Resources, Diversity Equity & Inclusion, Health and Safety and Sustainability functions (the later covering the topics of environment, climate change and affected communities), while the “Supplier workshops” included members of the Purchasing function selected in order to achieve representativeness of all purchasing categories and geographies.

In 2023, as a result, an updated risk map was drawn identifying and hierarchizing the risk scenarios based on their relative severity and likelihood. The severity of a risk scenario results from the scale of its impact on people or the environment (as assessed by workshop participants) and the scope of its impact (based either on objective quantitative data reflecting Imerys’ risk exposure or internationally recognized country risk indexes [1]). The impact’s likelihood is assessed by workshop participants taking into account existing controls and mitigation measures. Qualitative information gathered during workshops is also used to interpret the results and prioritize negative impacts and design action plans. Finally, as in previous years, the Duty of Care risk map was reviewed and approved by the Ethics Committee.

In 2024, the Duty of Care risk map was revised to take into account the finalization of the double materiality analysis, in particular the addition of four new scenarios for operations (pollution of soil, inadequate management of substances of concern, inadequate management of substances of very high concern, and pressure on biodiversity). It was reviewed and approved by the Ethics Committee.

*For more information on the Group risk management process, see chapter 2 of the Universal Registration Document.*
*For more information on the evaluation of climate-related risks related to Group operations, refer to [ESRS 2 IRO-1 E1] of the present chapter.*

## 2.3. Assessment and main controls

The Group assesses its operations and the situation of its suppliers taking into account, inter alia, the Duty of Care risk maps developed through the risk management process.

### Imerys operations and Group subsidiaries assessments and main controls

The Group assesses human rights, health and safety and environmental risks identified as a result of the Duty of Care risk mapping. This assessment includes identification, analysis and ranking processes. The Duty of Care risk map indicates that potential risks include health and safety, environment, climate change and some specific human rights topics. The 2023 and 2024 updates are in line with past risk maps. To mitigate and prevent these risks, Imerys implements high standards and strict rules relating to human rights, health and safety and the environment (amongst other themes) in all Group operations across the globe. These standards and rules are expressed in the Imerys Code of Business Conduct and Ethics and in the Sustainability Charter, completed by policies and procedures. This framework defines clear requirements for all Group operations. Implementation of Group policies and procedures are the responsibility of all business and support functions. The effectiveness of these control measures is regularly assessed as part of the Duty of Care risk mapping process. In addition, the Group assesses its sustainability policies, actions and results annually through a comprehensive independent sustainability assessment, sharing the results with internal and external stakeholders.

Details on the management of occupational safety & health risks are presented in [ESRS S1] of the present chapter, management of human rights risks is presented in [ESRS S2] of the present chapter and management of environmental risks is presented in [ESRS E2] and [ESRS E4] of this present chapter.

### Imerys Suppliers assessments

1 Indexes include, but are not limited to, the Yale University Environmental Performance Index, the International Labour Organization Child Labour Index, the Global Slavery Index, the Ecovadis Country Risk Score, the World Resources Institute Aqueduct Index.

Based on the Duty of Care risk mapping process described previously, the Group has identified potential salient human rights, health, safety and environmental risks within its value chain. In line with previous risk maps, at Group level, the 2023 risk map, which was not updated in 2024 with respect to suppliers, indicated three potential salient risks including:

- potential impacts on Supplier workers exposed to occupational injury or illness risks;
- potential impacts on Supplier workers related to inadequate working conditions, including wages, working time, social dialogue, collective bargaining and freedom of association; and
- potential increases in air or water pollution, and potential impacts on climate change and biodiversity due to Supplier operations.

In addition, the 2023 risk mapping enabled the Group to assess specific risks for each of the seven purchasing categories, thus enabling the Group to have a more informed vision of the risks faced in its upstream value chain.

Following the assessment of each purchasing category, for all the human rights, health, safety and environmental scenarios assessed, the "most-at-risk" Supplier category is considered the raw material Supplier category related to the supply of talc, bauxite and mica.

At the individual Supplier level, the Group regularly assesses its Suppliers at the onboarding stage and throughout the business relationship, focusing on most-at-risk and strategic Suppliers.

The individual Supplier assessment process comprises:

- the assessment of Suppliers at the onboarding stage. This process is defined in the Group purchasing policy. It includes a Suppliers' compliance due diligence procedure to decide whether or not to enter or renew a business relationship with a Supplier. The procedure takes into account the result of the Duty of Care risk mapping and Supplier's sustainability rating (e.g. EcoVadis score). This procedure has been applied to the existing most-at-risk Suppliers above a certain spend;
- the assessment of Imerys' Supplier panel above a certain spend through a sustainability rating scheme (e.g. Ecovadis). The Group Sustainable Purchasing Director is in charge of designing and monitoring the deployment of this process.

At the end of 2024, 70% of Group Suppliers by spend have been assessed. These assessments cover over 1,699 Suppliers and represent all categories of Suppliers, including over 98% of raw material Suppliers by spend.

### Imerys Suppliers risk prevention and mitigation measures

The Group implements prevention and mitigation measures, in particular:

- Suppliers are required to acknowledge and comply with the Group Imerys Supplier ESG Standards and the Supplier EHS Policy; Suppliers are excluded from contracting if they cannot achieve minimum ESG (environment, social , including occupational health and safety) requirements, as outlined in our ESG Supplier Standards;
- In case of doubt on compliance with Imerys Supplier ESG Standards, Imerys may verify the alignment of Suppliers with the Supplier ESG Standards through the use of self-declaration, self-assessments, or assessments by Imerys teams;
- Imerys is fully committed to support Suppliers' development and continuous improvement and has a Supplier development process in place, which includes information and trainings for Suppliers on how to build capacity and improve sustainability performance as well as access to sustainability benchmarks against peers;
- Suppliers must be able to demonstrate that they can meet the minimum criteria and where any gaps are identified, through formal or informal assessments or audits, Suppliers must be willing to develop and implement a corrective action plan within an agreed timeframe;
- In the case Imerys has a reasonable suspicion that Supplier is directly committing a serious violation of the Standards, or sourcing from any party committing a serious violation of the Standards, Imerys may suspend or terminate the relationship with Supplier, without any liability toward the Supplier;
- The Group conducts audits focusing on Suppliers ranked as "most-at-risk" based on the Group risk mapping and assessment process described above. In specific cases the Group may conduct additional due diligence or specialized external third-party audits prior to or after contract award;
- Imerys buyers are trained on key aspects of the responsible purchasing program to support its implementation, recognize risks and develop mitigation actions. 70% of buyers were trained on sustainability topics in 2024.

Within the most-at-risk category of raw material Suppliers, the purchasing organization has launched an audit program with both internal and external auditors. Internal auditors have been trained and completed SA8000 Social Accountability [1] Auditing training. External third party audits are conducted by certified auditors against SA8000 Standard.

In 2024, two new audits were carried out on targeted most-at-risk suppliers, in addition to the five others already carried out in 2023.

1 The SA8000 Standard is an auditable certification standard that measures the performance of companies in eight areas of social accountability in the workplace: child labour, forced labour, health and safety, free association and collective bargaining, discrimination, disciplinary practices, working hours and compensation. https://sa-intl.org/programs/sa8000/.

## Alert mechanism

The Group's whistleblowing system, Speak up!, operated by an independent qualified third party and open to all employees and external parties is designed to collect and manage reporting of any suspected violations of the Group Code. For more information on Imerys' whistleblowing system Speak up! (see section 1.4.1.2, paragraph "Alert system and protection of whistleblowers" of the present chapter).

The Group Community Grievance Mechanism is another mechanism for external stakeholders to voice their concerns and grievances, including potential violations of the Group Code, directly at site level.

*For more information on Imerys' Community Grievance Mechanism, refer to [ESRS G1] of this chapter.*

## Monitoring and evaluation of the effectiveness of control measures

In 2024, 40 cases of suspected violations of the Group Code were reported through Speak up!, and five of these cases were reported by external stakeholders. The reported cases were thoroughly reviewed and investigated as per the Group policy. Following investigation, 19 of the reported cases were confirmed to be cases of violations of the Group Code. The confirmed violations related to suspicions of behavioral misconducts and harassment (14), non-compliance with Group policies (3), unreported safety accident (1) and misappropriation of assets (1). Once the reported cases are confirmed, appropriate remedial actions are defined, implemented and are monitored by the Internal Audit and Control department.

Verification of compliance with the Group Code and other Group policies and procedures is conducted through various internal assessment processes at both local and Group level. Such processes are led by different functions within the Group organization, including but not limited to Legal, Sustainability, Health and Safety, Mining and Resources Planning and Internal Control as described in Chapter 2, section 2.2 of the Universal Registration Document.

*For more information with regards to the requirements of the "Duty of Care" law, see the correlation table included in section 9.5.5.2 of the Universal Registration Document.*

# PART 3 MINERAL RESERVES AND RESOURCES

The Mineral Reserves and Resources data published in this present chapter have been prepared in alignment with the Pan-European Standard for reporting of Exploration Results, Mineral Resources and Reserves 2021 (PERC Reporting Standard 2021), which is an internationally recognized reporting standard for mineral assets and a member of the CRIRSCO group of codes [1]. In accordance with Group procedures, the Group's Mineral Reserves and Mineral Resources are regularly audited by internal and external auditors.

## 3.1. Mineral Asset reporting

The Group Mineral Assets are composed of both Mineral Reserves and Mineral Resources. Mineral Reserves correspond to the portions of a deposit that are demonstrably economic to extract given the prevailing or reasonably forecast regulatory and economic climate at the time of estimation. Mineral Reserves are subdivided into Proven or Probable to reflect the level of certainty in the geological understanding of the deposit, Proven being the higher level. Mineral Resources include deposits or portions of deposits for which extraction has yet to be demonstrated as economically profitable, but it is reasonable to expect that extraction will be viable in the future. These assets typically lack the detailed (mining, processing, marketing and/or legal) technical studies required to demonstrate their economic viability. Mineral Resources are classified in ascending order of geological confidence as Inferred, Indicated or Measured.

The Group's processing operations consume its Mineral Reserves. Imerys continuously undertakes initiatives to compensate for the consumption of these Mineral Reserves in order to maintain a mineral inventory equivalent to around 20 years' worth of production. On existing sites, this involves the collection and analysis of additional data and detailed modeling of already identified Mineral Resources to confirm the potential for exploitation based on quality, quantity, mining parameters, available markets and costs as well as consideration of any potential environmental and social impacts. Where these studies lead to a positive conclusion, Imerys seeks to obtain the necessary exploitation rights (outright ownership, long-term lease or concession), permits and official authorizations. If these elements can be obtained, the Mineral Resources may be converted into Mineral Reserves. Group Mineral Reserves can also be replaced or increased through acquisitions from third parties or acquisitions of companies as part of the Group's external growth operations.

## 3.2. Mineral Asset audits

To ensure consistent reporting across all Group entities and alignment with all relevant standards, internal and external audits are conducted over a three to six-year cycle. Internal audits are conducted by experienced geologists and mining engineers who are independent of the sites they audit. Each internal audit is conducted by two people using standard assessment matrices. The internal reporting and internal audit system undergoes a third party audit at least every five years. Audit results are published in a report setting out any comments and improvement requirements, the implementation of which is then tracked. These audits are an opportunity to share best practices and drive continuous improvement in Mineral Asset management and exploitation. The results of the Mineral Reserves and Mineral Resources reporting and auditing are assessed by the Audit Committee.

1 CRIRSCO: Committee for Mineral Reserves International Reporting Standards.

## 3.3. Key Minerals

1. **Ball clays** are very fine-grained sedimentary clays with high plasticity. Once extracted, clays are selected, processed and blended to achieve the desired properties, such as rheological stability, high resistance and mechanical strength.
2. **Bentonite** is an alumino-silicate clay formed from altered volcanic rocks, it has high rheological and absorbent properties.
3. **Calcium carbonates** include marble, limestone and chalk. Processed carbonates are used in different forms. Ground natural calcium carbonate (GCC) is used for its whiteness and alkaline properties. Precipitated calcium carbonate (PCC) is a synthetic product obtained from natural limestone that contributes excellent optical properties to finished products.
4. **Diatomite** is a sedimentary mineral composed of the silicon-rich skeletons of diatoms – unicellular algae present in marine and lake environments. It is known for its low density, high surface area, high porosity and mattifying properties.
5. **Feldspars** are naturally occurring alumino-silicate minerals containing varying concentrations of potassium, sodium, calcium and/or lithium, and are used for their fusing properties at high and low temperatures.
6. **Kaolin** is composed predominantly of kaolinite, a white hydrated alumino-silicate clay produced by the geologic alteration of granite and similar types of rock. The high temperature (7001,200°C) to which it is subjected during the calcination process transforms kaolin into a whiter and more inert mineral. The kaolin family of minerals also includes halloysite, prized -in fine porcelain manufacture for its whiteness and translucence.
7. **Perlite** is a very specific type of volcanic rock with a natural water content of between 2% and 5%. Perlite is a low-density, high-porosity mineral. Processed and subsequently heated, perlite expands up to 20 times its original volume, creating a multi-cellular material with a large specific surface area at low density.
8. **Refractory minerals** are valued for their resistance to extreme temperatures, mechanical stresses and corrosion. They include refractory clays (transformed by calcination to chamotte), bauxite and andalusite.
9. **Talc** is a very soft hydrated magnesium silicate with properties unique to the deposit from which it is extracted.
10. **Wollastonite** is a metamorphic calcium mineral associated with skarns. Its elongated crystal structure and thermal properties are utilized in ceramics, cements, paints and plastics
11. **Lithium** is the third element of the periodic table. This light metal has a high charge density making it a key component of modern batteries.

Imerys extracts many other minerals, including bauxite, moler (a natural blend of diatoms and clays with highly absorbent properties), mica and zeolite. Imerys also produces high-quality quartz minerals required to produce silicon metal and ferro-silicon, both of which are used in special steel alloys. Imerys produces a range of high-quality synthetic graphites and talcs as well as the highest quality of fused magnesia, carbon black and zirconia.

## 3.4. Mineral Reserves and Resources

For the clarity and materiality of reporting its "Industrial Mineral" Reserves and Resources, Imerys has grouped mineral category estimates together. This also protects commercially sensitive information related to individual extraction sites. This practice is in accordance with the "Reporting of Industrial Minerals, Dimension Stone and Aggregates" section of the PERC Reporting Standard.

Industrial minerals "Mineral Resources" are reported separately from "Mineral Reserves". Product mass is expressed in thousands of metric tons of minerals marketable in dry form. The corresponding estimates at December 31, 2023 are presented for the purpose of comparison. Changes in estimates of mineral reserves and mineral resources between December 31, 2023 and December 31, 2024 correspond to minerals used in production, the ongoing exploration and assessment of new and existing assets, technical studies, changes in ownership and mining rights, as well as acquisitions and disposals made as part of normal business. Mining assets totaled €422.3 million at December 31, 2024 (€391.1 million at December 31, 2023).

In accordance with accounting rules, the mineral reserve and mineral resource assets are recognized at historical cost. They are initially measured at acquisition cost, and subsequently at historical cost minus any accumulated depreciation and impairment. Depreciation is estimated on the basis of actual extraction.

Mineral Reserves and Mineral Resources described in the table below are estimates of the size and quality of deposits based on the technical, regulatory and economic parameters available at a given point in time. Due to unpredictable changes in these parameters and the natural uncertainty associated with such assessments, estimates of Group Mineral Reserves and Resources presented in below table may vary over time. Over the course of geological exploration and assessment, Mineral Reserves and Mineral Resources may change significantly, either positively or negatively. At this point in time, Imerys has no knowledge of any environmental, legal, political or other factors that may adversely affect the estimates presented in these tables in any material way.

## 3.4.1. Industrial Minerals

### Industrial Mineral Reserves Estimates (at Dec. 31, 2024 vs Dec. 31, 2023)

| Product | Region | 2024 (ktonnes) | | | 2023 (ktonnes) | | |
|---|---|---|---|---|---|---|---|
| | | Proven | Probable | Total | Proven | Probable | Total |
| Ball Clays | Europe | 1,511 | 1,928 | 3,439 | 1,846 | 2,987 | 4,833 |
| | Americas | 3,353 | 134 | 3,487 | 3,560 | 111 | 3,671 |
| | Asia-Pacific | 778 | 0 | 778 | 676 | 0 | 676 |
| | Africa & Middle East | 0 | 58 | 58 | 0 | 472 | 472 |
| | Total | **5,642** | **2,120** | **7,762** | **6,082** | **3,570** | **9,652** |
| Bentonite | Europe | 5,295 | 779 | 6,074 | 5,679 | 1,038 | 6,717 |
| | Americas | 0 | 0 | 0 | 0 | 0 | 0 |
| | Africa & Middle East | 149 | 0 | 149 | 176 | 0 | 176 |
| | Total | **5,444** | **779** | **6,223** | **5,855** | **1,038** | **6,893** |
| Carbonates | Europe | 884 | 5,702 | 6,586 | 1,007 | 6,241 | 7,248 |
| | Americas | 35,954 | 100,596 | 136,550 | 34,818 | 100,675 | 135,493 |
| | Asia-Pacific | 0 | 17,811 | 17,811 | 0 | 18,311 | 18,311 |
| | Africa & Middle East | 0 | 0 | 0 | 0 | 0 | 0 |
| | Total | **36,838** | **124,109** | **160,947** | **35,825** | **125,227** | **161,052** |
| Feldspar | Europe | 1,770 | 474 | 2,244 | 3,227 | 1,179 | 4,406 |
| | Africa & Middle East | 0 | 0 | 0 | 0 | 0 | 0 |
| | Total | **1,770** | **474** | **2,244** | **3,227** | **1,179** | **4,406** |
| Kaolin | Europe | 2,452 | 2,863 | 5,315 | 2,886 | 1,872 | 4,758 |
| | Americas | 1,904 | 1,104 | 3,008 | 6,432 | 2,721 | 9,153 |
| | Asia-Pacific | 224 | 16 | 240 | 245 | 29 | 274 |
| | Total | **4,580** | **3,983** | **8,563** | **9,563** | **4,622** | **14,185** |
| Minerals for Refractories | Europe | 141 | 1,176 | 1,317 | 313 | 3,326 | 3,639 |
| | Americas | 3,668 | 883 | 4,551 | 3,718 | 880 | 4,598 |
| | Africa & Middle East | 1,371 | 932 | 2,303 | 574 | 586 | 1,160 |
| | Total | **5,180** | **2,991** | **8,171** | **4,605** | **4,792** | **9,397** |
| Perlite & Diatomite | Europe | 6,990 | 2,585 | 9,575 | 7,327 | 2,916 | 10,243 |
| | Americas | 19,986 | 10,926 | 30,912 | 20,056 | 11,153 | 31,209 |
| | Africa & Middle East | 0 | 422 | 422 | 0 | 435 | 435 |
| | Total | **26,976** | **13,933** | **40,909** | **27,383** | **14,504** | **41,887** |
| Talc | Europe | 5,460 | 5,471 | 10,931 | 369 | 12,925 | 13,294 |
| | Asia-Pacific | 1,641 | 655 | 2,296 | 1,703 | 663 | 2,366 |
| | Total | **7,101** | **6,126** | **13,227** | **2,072** | **13,588** | **15,660** |
| Other minerals | Europe | 856 | 75 | 931 | 1,088 | 77 | 1,165 |
| | Americas | 0 | 3,692 | 3,692 | 0 | 3,815 | 3,815 |
| | Africa & Middle East | 0 | 104 | 104 | 0 | 104 | 104 |
| | Total | **856** | **3,871** | **4,727** | **1,088** | **3,996** | **5,084** |

*Note: In addition to the normal activities of production, significant changes in the Mineral Reserves occurred due to the sale of paper related kaolin assets in South America and bauxite in Europe. There were reassessments in Feldspar and Talc in Europe, and Ball Clays in Americas.*

## Industrial Mineral Resources Estimates (at Dec. 31, 2024 vs Dec. 31, 2023)

| | | 2024 (ktonnes) | | | | 2023 (ktonnes) | | | |
|---|---|---|---|---|---|---|---|---|---|
| Product | Region | Measured | Indicated | Inferred | Total | Measured | Indicated | Inferred | Total |
| **Ball Clays** | Europe | 361 | 2,447 | 1,704 | 4,512 | 8,873 | 1,924 | 1,219 | 12,016 |
| | Americas | 4,424 | 7,327 | 9,134 | 20,885 | 4,637 | 8,503 | 6,645 | 19,785 |
| | Asia-Pacific | 31 | 0 | 0 | 31 | 31 | 0 | 0 | 31 |
| | Africa & Middle East | 0 | 0 | 277 | 277 | 0 | 0 | 0 | 0 |
| | Total | **4,816** | **9,774** | **11,115** | **25,705** | **13,541** | **10,427** | **7,864** | **31,832** |
| **Bentonite** | Europe | 36,228 | 10,768 | 5,967 | 52,963 | 43,358 | 14,679 | 1,068 | 59,105 |
| | Americas | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Africa & Middle East | 242 | 7 | 302 | 551 | 237 | 7 | 301 | 545 |
| | Total | **36,470** | **10,775** | **6,269** | **53,514** | **43,595** | **14,686** | **1,369** | **59,650** |
| **Carbonates** | Europe | 0 | 2,688 | 4,679 | 7,367 | 0 | 2,754 | 4,811 | 7,565 |
| | Americas | 14,436 | 68,138 | 124,645 | 207,219 | 14,505 | 65,795 | 125,952 | 206,252 |
| | Asia-Pacific | 10,095 | 0 | 1,194 | 11,289 | 10,095 | 0 | 512 | 10,607 |
| | Africa & Middle East | 0 | 4,651 | 0 | 4,651 | 0 | 4,651 | 0 | 4,651 |
| | Total | **24,531** | **75,477** | **130,518** | **230,526** | **24,600** | **73,200** | **131,275** | **229,075** |
| **Feldspar** | Europe | 2,232 | 1,700 | 5,634 | 9,566 | 468 | 1,278 | 5,637 | 7,383 |
| | Africa & Middle East | 0 | 151 | 0 | 151 | 0 | 151 | 0 | 151 |
| | Total | **2,232** | **1,851** | **5,634** | **9,717** | **468** | **1,429** | **5,637** | **7,534** |
| **Kaolin** | Europe | 2,058 | 2,373 | 7,899 | 12,330 | 1,456 | 2,546 | 13,490 | 17,492 |
| | Americas | 16,362 | 40,615 | 13,986 | 70,963 | 30,333 | 63,094 | 40,983 | 134,410 |
| | Asia-Pacific | 199 | 958 | 237 | 1,394 | 881 | 372 | 35 | 1,288 |
| | Total | **18,619** | **43,946** | **22,122** | **84,687** | **32,670** | **66,012** | **54,508** | **153,190** |
| **Minerals for Refractories** | Europe | 125 | 1,771 | 876 | 2,772 | 103 | 3,910 | 3,112 | 7,125 |
| | Americas | 4,967 | 2,930 | 2,395 | 10,292 | 5,012 | 2,941 | 2,398 | 10,351 |
| | Africa & Middle East | 0 | 450 | 1,312 | 1,762 | 450 | 600 | 1,004 | 2,054 |
| | Total | **5,092** | **5,151** | **4,583** | **14,826** | **5,565** | **7,451** | **6,514** | **19,530** |
| **Perlite & Diatomite** | Europe | 17,819 | 10,513 | 16,179 | 44,511 | 16,117 | 12,232 | 16,665 | 45,014 |
| | Americas | 15,636 | 16,140 | 24,226 | 56,002 | 18,860 | 15,856 | 23,937 | 58,653 |
| | Africa & Middle East | 0 | 842 | 3,347 | 4,189 | 0 | 352 | 6,209 | 6,561 |
| | Total | **33,455** | **27,495** | **43,752** | **104,702** | **34,977** | **28,440** | **46,811** | **110,228** |
| **Talc** | Europe | 1,766 | 3,314 | 1,289 | 6,369 | 150 | 1,594 | 6,137 | 7,881 |
| | Asia-Pacific | 2,845 | 1,458 | 1,638 | 5,941 | 2,845 | 1,458 | 1,638 | 5,941 |
| | Total | **4,611** | **4,772** | **2,927** | **12,310** | **2,995** | **3,052** | **7,775** | **13,822** |
| **Other minerals** | Europe | 2,009 | 6,590 | 2,645 | 11,244 | 1,998 | 6,304 | 2,645 | 10,947 |
| | Americas | 6,357 | 5,822 | 30,502 | 42,681 | 6,357 | 5,710 | 34,644 | 46,711 |
| | Africa & Middle East | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Total | **8,366** | **12,412** | **33,147** | **53,925** | **8,355** | **12,014** | **37,289** | **57,658** |

*Notes: In addition to the normal activities of exploration, resource development and transfer of resources to reserves, in 2024 there were significant changes in Mineral Resources due to sale of paper related kaolin assets in South America, reassessments of kaolin and talc sites in Europe.*

### 3.4.2. Lithium

Imerys currently has two active lithium exploration projects which have the potential to make the Group the largest integrated lithium supplier in Europe, representing more than 20% of the European lithium output by 2030.

#### France – Project EMILI

During 2022, Imerys completed an initial exploration drilling program (EMILI Project Phase 1) to determine if the Beauvoir Granite, one of three granites present at the current Beauvoir kaolin operations, has the potential to be developed into an underground lithium mine. The exploration program has shown that the Beauvoir Granite contains lithium mineralization, in the form of lepidolite, in sufficient amounts and concentration to demonstrate that there are "Reasonable Prospects For Eventual Economic Extraction" (RPEEE), as referred to in the PERC (2021) reporting standard.

Imerys commissioned the consultancy firm AMC [1] to prepare a maiden Mineral Resource Estimate (MRE) for the areas of the Project that demonstrate RPEEE.

Consistent with normal industry practice for the reporting of metalliferous Mineral Resources, Imerys reports the resource in terms of tonnes and grade of in-situ material rather than tonnes of final product as is the normal practice with industrial minerals.

AMC has classified the resource at an Inferred level of confidence and reported it in accordance with the PERC (2021) Reporting Standard requirements. The results of the MRE are presented below. Drilling has continued through 2023 and 2024 supporting the completion of a Pre-Feasibility study.

*For further details on the EMILI project, see Chapter 1, section 1.2.2 of the Universal Registration Document.*

EMILI Project Phase 1 Mineral Resources summary

| Classification | Volume (000,000' m³) | Tonnage (000,000' t) | Density (t/m³) | Li2O (%) | Sn (%) | Ta (%) |
|---|---|---|---|---|---|---|
| Inferred | 44.1 | 116.8 | 2.65 | 0.90 | 0.13 | 0.02 |

- Mineral Resources are not Mineral Reserves until they have demonstrated economic viability based on a feasibility study or pre-feasibility study.
- The effective date of the Mineral Resources is June 7, 2022.
- Mineral Resources are reported exclsive of any Mineral Reserves.
- The contained Li2O, Sn and Ta represents estimated contained metal in the ground and has not been adjusted for metallurgical recovery.
- Mineral Resources are reported assuming mining via underground or open pit methods at a cut-off grade of 0.5% Li2O based on a LiOH price of €21,450/t. Concentrate recovery used is 75% and refining recovery from concentrate is 87%.
- Mineral Resources are reported inclusive of ground support pillars.
- The Mineral Resource has been compiled in accordance with the PERC Reporting standard (2021).
- The Competent Person (CP) responsible for reporting the EMILI Mineral Resource is an AMC Principal Geologist, who is a Chartered Geologist with the Geological Society of London and has over five years of experience in estimates of lithium and granite hosted deposits.

1 AMC is an internationally recognized mining consultancy https://www.amcconsultants.com/.

## United Kingdom – British Lithium

In July 2023, Imerys acquired an 80% stake in British Lithium, which has developed a processing route to produce battery-grade lithium from Cornish granite. In November 2024 Imerys acquired full ownership of Imerys British Lithium. Over the previous five years, British Lithium completed a series of drilling programmes on prospective parts of Imerys' land holding within the Saint Austell area. This culminated in the reporting of a maiden Mineral Resource Estimate (MRE) in May 2023. British Lithium has classified the resource at an Inferred level of confidence and reported it in accordance with the JORC (2012) Code[1]. The results of the MRE are presented below with further details available on the Imerys British Lithium website.

### Imerys British Lithium Mineral Resources Summary

| Classification | Volume (000,000' $m^3$) | Tonnage (000,000' t) | Density ($t/m^3$) | Li2O (%) |
|---|---|---|---|---|
| Inferred - G5 Granite | 50.4 | 131.0 | 2.6 | 0.57 |
| Inferred - Lode | 11.6 | 29.7 | 2.55 | 0.39 |

- Mineral Resources are not Mineral Reserves until they have demonstrated economic viability based on a feasibility study or pre-feasibility study.
  - The effective date of the Mineral Resources is May 18, 2023.
  - Mineral Resources are reported exclusive of any Mineral Reserves.
  - The contained Li2O represents estimated contained metal in the ground and has not been adjusted for metallurgical recovery.
  - Mineral Resources are reported assuming mining via an open pit method at a cut-off grade of 0.15% Li2O based on a LCE price of US$25,000/t. global plant metal recovery of 72%
  - The Mineral Resource has been compiled in accordance with the 2012 JORC Code.
  - The Competent Person (CP) responsible for reporting the Imerys British Lithium Mineral Resource is a Member of the Australasian Institute of Mining and Metallurgy and has over five years of experience in estimates of lithium and granite hosted deposits.

1 The Australasian Code for Reporting of Exploration Results, Mineral Resources and Ore Reserves ('the JORC Code') is a professional code of practice that sets minimum standards for Public Reporting of minerals Exploration Results, Mineral Resources and Ore Reserves. The JORC Code provides a mandatory system for the classification of minerals Exploration Results, Mineral Resources and Ore Reserves according to the levels of confidence in geological knowledge and technical and economic considerations in Public Reports.

# 7.5 Statutory Auditor's report

## LIMITED ASSURANCE REPORT OF THE STATUTORY AUDITOR TO THE GENERAL SHAREHOLDERS' MEETING ON THE CONSOLIDATED SUSTAINABILITY STATEMENT OF GROUPE BRUXELLES LAMBERT SA/NV FOR THE ACCOUNTING YEAR ENDED ON 31 DECEMBER 2024

We present to you our statutory registered auditor's report in the context of our legal limited assurance engagement on the consolidated sustainability statement of Groupe Bruxelles Lambert SA/NV (the « Company ») and its subsidiaries (jointly « the Group »). The consolidated sustainability statement of the Group is included in Chapter 7 of the annual report (volume 2) on 31 December 2024 and for the year then ended (hereafter « the consolidated sustainability statement »).

We have been appointed by the general meeting d.d. 2 May 2024, following the proposal formulated by the board of directors and following the recommendation by the audit committee of Groupe Bruxelles Lambert SA/NV to perform a limited assurance engagement on the consolidated sustainability statement of the Group.

Our mandate will expire on the date of the general meeting which will deliberate on the annual accounts for the year ended 31 December 2024. We have performed our assurance engagement on the consolidated sustainability statement for 1 year.

### Limited assurance conclusion

We have conducted a limited assurance engagement on the consolidated sustainability statement of the Group.

Based on the procedures we have performed and the assurance evidence we have obtained, nothing has come to our attention that causes us to believe that the consolidated sustainability statement of the Group, in all material respects:

- Has not been prepared in accordance with the requirements of article 3:32/2 of the Companies' and Associations' Code, including compliance with the applicable European Sustainability Reporting Standards (ESRS).
- Is not in accordance with the process (the « Process ») carried out by the Group, as disclosed in sections 7.3.2.1. « General information » and 7.3.2.2. « Consolidated double materiality analysis » to identify the information reported in the consolidated sustainability statement on the basis of ESRS.
- Does not comply with the requirements of article 8 of EU Regulation 2020/852 (the « Taxonomy Regulation ») disclosed in section 7.3.2.3.3. « Part II - GBL consolidated - Consolidated environmental disclosures - Taxonomy ».

### Basis for conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance engagements other than audits or reviews of historical financial information* (« ISAE 3000 (Revised) »), as applicable in Belgium.

Our responsibilities under this standard are further described in the « Responsibilities of the statutory registered auditor on the limited assurance engagement on the consolidated sustainability statement » section of our report.

We have complied with all ethical requirements that are relevant to assurance engagements of sustainability statements in Belgium, including those related to independence.

We apply International Standard on Quality Management 1 (ISQM 1), which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have obtained from the board of directors and Company officials the explanations and information necessary for performing our limited assurance engagement.

We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

PwC Bedrijfsrevisoren BV - PwC Reviseurs d'Entreprises SRL - Financial Assurance Services
Maatschappelijke zetel/Siège social: Culliganlaan 5, B-1831 Diegem
T: +32 (0)2 710 4211, F: +32 (0)2 710 4299, www.pwc.com
BTW/TVA BE 0429.501.944 / RPR Brussel - RPM Bruxelles / ING BE43 3101 3811 9501 - BIC BBRUBEBB /
BELFIUS BE92 0689 0408 8123 - BIC GKCC BEBB

## Emphasis of matter - sustainability statement structure

We draw attention to section 7.1.4 « GBL's sustainability statement structure » of the Basis of Preparation Statement, which explains how:

(i) The structure of the consolidated sustainability statement (« GBL Holding », « GBL Consolidated », and an appendix with detailed information specific to controlled portfolio companies), and

(ii) The principle of double materiality applied at consolidated and different levels,

make the information more understandable in light of the Company's approach and ESG integration process (« GBL acting as a responsible company » and « GBL acting as a responsible investor »), while respecting the general presentation and structure requirements (ESRS 1 §8) and the qualitative characteristics of the information (ESRS 1 §8, Appendix B). Our conclusion is not modified in respect of this matter.

## Other matter

The scope of our work is limited to our limited assurance engagement regarding the consolidated sustainability information of the Group. Our limited assurance engagement does not extend to information related to the comparative figures included in the consolidated sustainability statement.

## Responsibilities of the board of directors relating to the preparation of the consolidated sustainability statement

The board of directors is responsible for designing and implementing a Process and for disclosing this Process in sections 7.3.2.1. « General information » and 7.3.2.2. « Consolidated double materiality analysis » of the consolidated sustainability statement. This responsibility includes:

- Understanding the context in which the activities and business relationships of the Group take place and developing an understanding of its affected stakeholders.
- The identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long- term.
- The assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds.
- Making assumptions that are reasonable in the circumstances.

The board of directors is further responsible for the preparation of the consolidated sustainability statement, which includes the information established by the Process:

- In accordance with the requirements referred to in article 3:32/2 of the Companies' and Associations' Code, including the applicable European Sustainability Reporting Standards (ESRS).
- In compliance with the requirements of article 8 of EU Regulation 2020/852 (the « Taxonomy Regulation ») disclosed in section 7.3.2.3.3 « Part II - GBL consolidated - Consolidated environmental disclosures - Taxonomy ».

This responsibility comprises:

- Designing, implementing and maintaining such internal control that the board of directors determines is necessary to enable the preparation of the consolidated Sustainability Statement that is free from material misstatement, whether due to fraud or error.
- The selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

The audit committee is responsible for overseeing the Group's sustainability reporting process.

## Inherent limitations in preparing the consolidated Sustainability Statement

In reporting forward-looking information in accordance with ESRS, the board of directors is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. Actual outcomes are likely to be different since anticipated events frequently do not occur as expected and the deviation from that can be of material importance.

## Responsibilities of the statutory auditor on the limited assurance engagement on the consolidated sustainability statement

Our responsibility is to plan and perform the assurance engagement with the aim of obtaining a limited level of assurance about whether the consolidated sustainability statement contains no material misstatements, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or errors and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of the consolidated sustainability statement.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), as applicable in Belgium, we apply professional judgment and maintain professional scepticism throughout the engagement. The work performed in an engagement aimed at obtaining a limited level of assurance, for which we refer to the section « Summary of work performed », is less in scope than in an engagement aimed at obtaining a reasonable level of assurance. Therefore, we do not express an opinion with a reasonable level of assurance as part of this engagement.

As the forward-looking information in the consolidated sustainability statement and the assumptions on which it is based, are future related, they may be affected by events that may occur in the future and possible future actions by the Group. Actual outcomes are likely to be different from the assumptions, as the anticipated events frequently do not occur as expected, and the deviation from that can be of material importance. Therefore, our conclusion does not provide assurance that the reported actual outcomes will correspond with those included in the forward-looking information in the consolidated sustainability statement.

Our responsibilities regarding the consolidated sustainability statement, with respect to the Process, include:

- Obtaining an understanding of the Process, but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process.
- Designing and performing work to evaluate whether the Process is consistent with the description of the Process by the Group, as set out in sections 7.3.2.1. « General information » and 7.3.2.2. « Consolidated double materiality analysis ».

Our other responsibilities regarding the sustainability statement include:

- Acquiring an understanding of the entity's control environment, the relevant processes, and information systems for preparing the sustainability information, but without assessing the design of specific control activities, obtaining supporting information about their implementation, or testing the effective operation of the established internal control measures.
- Identifying where material misstatements are likely to arise, whether due to fraud or error, in the consolidated sustainability statement.
- Designing and performing procedures responsive to where material misstatements are likely to arise in the consolidated sustainability statement. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

## Summary of work performed

A limited assurance engagement involves performing procedures to obtain evidence about the consolidated sustainability statement. The procedures carried out in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing, and extent of procedures selected depend on professional judgment, including the identification of areas where material misstatements are likely to arise in the consolidated sustainability statement, whether due to fraud or errors.

In conducting our limited assurance engagement with respect to the Process, we have:

- Obtained an understanding of the Process by:
  - Performing inquiries to understand the sources of the information used by management (e.g., stakeholder engagement, business plans and strategy documents).
  - Reviewing the Group's internal documentation relating to its Process.
- Evaluated whether the evidence obtained from our procedures with respect to the Process implemented by the Group was consistent with the description of the Process set out in sections 7.3.2.1. « General information » and 7.3.2.2. « Consolidated double materiality analysis ».

In conducting our limited assurance engagement, with respect to the consolidated Sustainability Statement, we have:

- Obtained an understanding of the Group's reporting processes relevant to the preparation of its consolidated Sustainability Statement by obtaining an understanding of the Group's control environment, processes and information system relevant to the preparation of the consolidated sustainability statement, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.
- Evaluated whether the information identified by the Process is included in the consolidated Sustainability Statement.
- Evaluated whether the structure and the presentation of the consolidated Sustainability Statement is in accordance with the ESRS.
- Performed inquiries of relevant personnel and analytical procedures on selected information in the consolidated sustainability statement.
- Performed substantive assurance procedures on selected information in the consolidated sustainability statement.
- Evaluated the methods/assumptions for developing estimates and forward-looking information as described in the section « Responsibilities of the statutory auditor on the limited assurance engagement on the consolidated sustainability statement ».
- Obtained an understanding of the Group's process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the consolidated sustainability statement.

## Statement related to independence

Our registered audit firm and our network did not provide services which are incompatible with the limited assurance engagement, and our registered audit firm remained independent of the Group in the course of our mandate.

Diegem, 1 April 2025

**The statutory auditor**

PwC Bedrijfsrevisoren BV/PwC Reviseurs d'Entreprises SRL

**Represented by**

Alexis Van Bavel*
Bedrijfsrevisor/Réviseur d'Entreprises

*Acting on behalf of Alexis Van Bavel SRL

**Groupe Bruxelles Lambert**
Avenue Marnix 24 - 1000 Brussels - Belgium
Tel.: +32 2 289 17 17
RLE: Brussels
VAT: BE 0407 040 209

www.gbl.com