

Sustainability Statement 2024

Excellence in Detail. Responsibility in All We Do.

Dear Readers,

For over 130 years, the LEHVOSS Group has stood for reliability, innovation and sustainable growth. In a rapidly changing world, we embrace responsibility—for our employees, our business partners, society, and the environment.

As a family-owned business now in its fourth generation, sustainability is not a passing trend for us but a fundamental part of our corporate strategy. We firmly believe that only those who act with foresight today will be successful tomorrow. That is why we consistently integrate ecological, social, and ethical principles into every aspect of our operations from procurement and production to our collaborations with partners worldwide.

This report illustrates how sustainability is embedded at LEHVOSS: we reduce emissions, increase resource efficiency, promote the circular economy, and are committed to fair working conditions. At the same time, we actively address the challenges posed by new legal requirements, global supply chains, and the need to protect people and the environment.

Our goal is to work together with you – our employees, customers, suppliers, and partners – to develop sustainable solutions and actively shape the future. We are grateful to everyone who joins us on this journey for their commitment, their ideas, and their willingness to take responsibility.

Let us continue to strive for excellence in detail and responsibility in all we do.

Yours sincerely,



Soenke Thomsen

Chair of the Executive Board

General Disclosures	5
Basis for preparation	5
General basis for preparation of the Sustainability Statement	5
Disclosures in relation to specific circumstances	6
Governance	6
The role of the administrative, management and supervisory bodies	6
Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies	7
Statement on due diligence	8
Risk management and internal controls over sustainability reporting	9
Strategy	10
Strategy, business model and value chain	10
Sustainability strategy	11
Stakeholder interests and views	12
Management of impacts, risks and opportunities	13
Description of the process for identifying and assessing material impacts, risks and opportunities	13
Inventory analysis	13
Impact materiality	14
Financial materiality	14
Stakeholder engagement	15
Consolidation	15
Disclosure requirements included in ESRS and covered by the Sustainability Statement	16
Environment	18
Climate change	18
Material impacts, risks and opportunities	19
Policies relating to climate change mitigation	19
Management of impacts, risks and opportunities	20
Actions in relation to climate change mitigation	20
Ambitions in terms of climate change mitigation	21
Metrics	22
Energy consumption and energy mix	22
Gross GHG emissions (Scope 1, 2 and 3) and total GHG emissions	23
Pollution	25
Material impacts, risks and opportunities	25
Policies related to pollution	25
Management of impacts, risks and opportunities	26
Actions relating to pollution	26
Ambitions in relation to pollution	27
Metrics	28
Microplastics	28
Substances of concern and substances of very high concern	28
Water	29
Material impacts, risks and opportunities	29
Policies related to water	29
Management of impacts, risks and opportunities	30
Actions relating to water	30
Ambitions with regard to water	30
Metrics	31
Water consumption and water intensity	31

Circular economy	32
Material impacts, risks and opportunities	32
Policies related to resource utilisation and circular economy	32
Circular economy in the value chain	33
Management of impacts, risks and opportunities	33
Actions and resources related to resource use and circular economy	33
Ambitions in terms of resource use and the circular economy	33
Metrics	34
Resource inflows	34
Resource outflows	34
Social	35
Our Policy Statement	35
Own Workforce	36
Material impacts, risks and opportunities	36
Policies relating to the company's own workforce	37
Management of impacts, risks and opportunities	38
Processes for engaging with own workforce and workers' representatives about impacts	38
Procedures to address negative impacts and channels through which employees can raise concerns	38
Actions in relation to own workforce	39
Ambitions in relation to the company's own workforce	41
Metrics	41
Employee characteristics	41
Characteristics of the non-employee workforce	42
Collective bargaining coverage and social dialogue	42
Diversity parameters	42
Social protection	43
People with disabilities	43
Training and skills development	43
Health protection and safety	43
Compensation metrics (pay gap and total compensation)	44
Incidents, complaints and severe impacts related to human rights	44
Value chain	45
Material impacts, risks and opportunities	45
Policies related to the value chain	45
Management of impacts, risks and opportunities	46
Processes to remediate negative impacts and channels for value chain workers to raise concerns	46
Actions in relation to the value chain	46
Ambitions in relation to the value chain	47
Governance	48
Material impacts, risks and opportunities	48
Policies in connection with business conduct policies and corporate culture	49
Identification and investigation of indications of breaches of regulations	49
Risk management	50
Management of impacts, risks and opportunities	50
Corporate culture	50
Management of relationships with suppliers	50
Prevention and detection of corruption and bribery	52
Incidents of corruption and bribery	53
Ambitions with regard to corporate policy and culture	53

General Disclosures

Basis for preparation

General basis for preparation of the Sustainability Statement

ESRS 2-BP-1-5-(a); ESRS 2-BP-1-5-(b)-i; ESRS 2-BP-1-5-(b)-ii; ESRS 2-BP-1-5-(c); ESRS 2-BP-1-5-(d); ESRS 2-BP-1-5-(e)

The ultimate parent company of the LEHVOSS Group (hereinafter: LEHVOSS) is Lehmann&Voss&Co. KG (hereinafter: LuV KG), headquartered in Hamburg, Germany. LuV KG is fully active in production, distribution, and trading, and also manages the Group's holding activities. The subsidiaries are responsible for specific functions in their respective local markets.

Within the Group, LuV KG holds 100 per cent of the shares in LEHVOSS Beteiligungsgesellschaft mbH (hereinafter: the holding company), which in turn holds 100 per cent of the shares of all other subsidiaries. The holding company serves as an intermediate holding for the LEHVOSS companies. With the exception of one subsidiary in Solingen, Germany, all subsidiaries are based abroad. There is also a 49 per cent stake in an associated company in Denmark (Engredo ApS).

As the ultimate parent company, LuV KG prepares and publishes this consolidated Sustainability Statement in alignment with the requirements of the Corporate Sustainability Reporting Directive (CSRD). Since LuV KG does not fall within the scope of the CSRD, this reporting is voluntary. All subsidiaries are included, meaning the scope of consolidation for the Sustainability Statement is identical to that of the consolidated financial statements of LuV KG:

- LEHVOSS Beteiligungsgesellschaft mbH, Hamburg, Germany
- LEHVOSS France S.a.r.l., Dreux, France
- LEHVOSS UK Ltd., Macclesfield, Cheshire, United Kingdom
- LEHVOSS Italia S.r.l., Milan, Italy
- LEHVOSS Nederland B.V., Rotterdam, Netherlands
- LEHVOSS North America Holding Inc., Pawcatuck, Connecticut, USA
- LEHVOSS North America Inc. (formerly: Performance Compounding Inc.), Pawcatuck, Connecticut, USA
- LEHVOSS (Shanghai) Chemical Co., Ltd., Shanghai, China
- LEHVOSS New Material (Kunshan) Co. Ltd., Kunshan, China
- LEHVOSS Polska Sp. z o.o., Warsaw, Poland
- LEHVOSS C.D. IBERIA S.L.U, Sant Just Desvern (Barcelona), Spain
- LEHVOSS Schweiz GmbH, Frauenfeld, Switzerland
- WMK PLASTICS GmbH, Solingen, Germany
- LEHVOSS Korea Ltd., Seoul, Korea

The LEHVOSS Sustainability Statement extends beyond our own operations to include processes associated with our products, services, and business relationships throughout the upstream and downstream value chain. In presenting these processes, we have chosen not to exercise the option to a) exclude any competitively sensitive information regarding intellectual property, know-how, or innovation results, or b) omit information on forthcoming developments or ongoing negotiations.

This report covers the 2024 financial year (calendar year); in addition, certain actions from the first quarter of 2025 are mentioned. The document was finalised on 22 August 2025, with an editorial deadline of 15 August 2025. The Executive Board reviewed and approved the 2024 Sustainability Statement on 4 September 2025.

Note on inclusive language: For reasons of readability, gendered forms are not used throughout this report. All personal designations are intended to be inclusive of all genders.

Disclosures in relation to specific circumstances

ESRS 2-BP-2-10-(a); ESRS 2-BP-2-10-(b); ESRS 2-BP-2-10-(c); ESRS 2-BP-2-11-(a); ESRS 2-BP-2-11-(b)-i; ESRS 2-BP-2-11-(b)-ii; ESRS 2-BP-2-15; ESRS 2-BP-2-16

The data and metrics disclosed in the Sustainability Statement 2024 relate to the entire LEHVOSS Group. However, in some cases, data and metrics for individual subsidiaries were not fully available. In such instances, the scope of information was limited and any deviations are indicated at the relevant points.

The data disclosed in the report were collected for the period from 1 January to 31 December 2024. Employee-related metrics generally refer to the reporting date of 31 December 2024. Any deviations are reported accordingly.

The metrics are primarily based on analyses of data from our enterprise resource planning systems. Exact values were generally used; where this was not possible, this is explicitly noted. In certain cases, estimates or extrapolations were necessary in preparing the report; these are documented internally. For example, generalised information from databases was sometimes used for data relating to the upstream and downstream value chain. Actual values may differ from these estimates.

Apart from the European Sustainability Reporting Standards (ESRS) under the CSRD, no other frameworks were considered in the preparation of this report. No information from other sources has been incorporated by reference in this report.

Governance

The role of the administrative, management and supervisory bodies

ESRS 2-GOV-1-21-(a); ESRS 2-GOV-1-21-(b); ESRS 2-GOV-1-21-(b); ESRS 2-GOV-1-21-(c); ESRS 2-GOV-1-21-(d); ESRS 2-GOV-122-(a); ESRS 2-GOV-1-22-(b); ESRS 2-GOV-1-22-(c); ESRS ESRS 2-GOV-1-22-(c)-i; ESRS 2-GOV-1-22-(c)-ii; ESRS 2-GOV-1-22-(c)-iii; ESRS 2-GOV-1-22-(d); ESRS 2-GOV-1-23; ESRS 2-GOV-1-23-(a); ESRS 2-GOV-1-23-(b); ESRS G1-ESRS 2 GOV-1-5-(a); ESRS G1-ESRS 2 GOV-1-5-(b)

Ultimate responsibility for the management of material impacts, risks, and opportunities lies with the highest governance body of the LEHVOSS Group, namely the Executive Board of LuV KG. This body exercises oversight of the Group's sustainability strategy, policies, and targets, ensuring their implementation and adaptation in close cooperation with the respective executive management teams of the subsidiaries. The subsidiaries provide the relevant data and actively support the operational implementation of actions to achieve LEHVOSS's sustainability goals.

The Executive Board of LuV KG consists of the three general partners Knut Breede, Dr Thomas Oehmichen, Soenke Thomsen, and the Chief Financial Officer Aage Barfuß. There is also an Advisory Board comprising Matthias Schneider, Angela Cackovich (until 30 June 2025) and Karsten Beckmann. The two bodies therefore comprise four executive and three non-executive members. The proportion of female members on the Executive Board is 0 per cent; the proportion on the Advisory Board is one third. This results in a ratio of around 14 per cent female to 86 per cent male members for both bodies. While the Executive Board is responsible for the strategic implementation of corporate decisions and risk management, the Advisory Board has a supervisory and advisory function.

The Executive Board and the Advisory Board possess appropriate basic knowledge of sustainability. In addition, the members of these bodies have access to training courses and internal training programmes, including on business ethics (details can be found in the section on preventing and detecting corruption and bribery in the chapter on corporate governance). This training and the expertise available ensure that the Executive Board and other management functions have the necessary competence to effectively monitor and manage corporate policy. Through their role in adopting the Code of Conduct as a corporate guideline for the LEHVOSS Group, the members of the Executive Board embed our commitment to ethical business behaviour within the company. In addition, the sustainability team includes internal sustainability experts and there is access to external specialists who support sub-projects as part of the Group project. In future, we want to align the expertise of managers more closely with the key impacts, risks and opportunities so that they can make effective sustainability related decisions. Managers at the subsidiaries also receive regular training to expand their expertise in sustainability. The development of managers' skills in sustainability was significantly advanced in 2024 through webinars, internal presentations and workshops, but remains a strategic goal.

Our sustainability targets are monitored through structured information processes, consultations and clear decision-making mechanisms. The targets are proposed by LuV KG's specialist departments in consultation with the Legal & Sustainability department and approved by the Executive Board. The Controlling and Sustainability departments monitor progress towards achieving the targets and report on this to the Executive Board. To ensure responsible corporate governance in the area of sustainability, LEHVOSS has a sustainability team and topic managers in the specialist departments who assess regulatory developments and define or propose operational actions. The sustainability team consults the LuV KG works council as required in order to include the interests of employees in sustainability work.

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

ESRS 2-GOV-2-26-(a); ESRS 2-GOV-2-26-(b); ESRS 2-GOV-2-26-(c)

In 2024, LEHVOSS performed a double materiality analysis and a comprehensive due diligence review. The identified material impacts, risks and opportunities (IROs) were presented to the Executive Board and the Advisory Board of LuV KG by the Legal & Sustainability department. The two bodies took the main IROs into account when formulating the sustainability strategy and deriving targets and actions. A detailed overview of the IROs is provided at the beginning of each individual topic chapter.

The Executive Board has overall responsibility for the human rights obligations of LEHVOSS. Implementation is the responsibility of the subsidiaries, business units, Purchasing and the Human Resources service unit of LUV KG.

Monitoring is carried out in accordance with the dual control principle by an independent committee consisting of the Legal & Sustainability department and Internal Audit, which reports directly to the Executive Board. In addition, our internal control system (ICS) ensures high data quality and compliance with relevant standards.

We rely on regular reporting to inform the Executive Board and the Advisory Board about the implementation of due diligence obligations and the results and effectiveness of the policies, targets, actions and metrics adopted in the area of sustainability. This takes place primarily in meetings of the Steering Committee approximately every two months, through annual departmental reports and through supplementary ad hoc reports and risk workshops.

Statement on due diligence

The following table provides an overview of how the core elements of due diligence are embedded within the LEHVOSS Sustainability Statement, in accordance with ESRs 2-GOV-4-32

Core elements of due diligence	Paragraphs in the Sustainability Statement
Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies ESRS 2 SBM-2 Interests and views of stakeholders ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities E2-1 Policies related to pollution E3-1 Policies related to water E5-1 Policies related to resource use and circular economy S1-1 Policies related to own workforce S2-1/S3-1 Policies related to the value chain G1-1 Policies related to business conduct and corporate culture
Identifying and assessing adverse impacts	ESRS 2 IRO-1 Description of the process for identifying and assessing material impacts, risks and opportunities E1 SBM-3 Material impacts, risks and opportunities E2 SBM-3 Material impacts, risks and opportunities E3 SBM-3 Material impacts, risks and opportunities E5 SBM-3 Material impacts, risks and opportunities S1 SBM-3 Material impacts, risks and opportunities S2/S3 SBM-3 Material impacts, risks and opportunities G1 SBM-3 Material impacts, risks and opportunities
Taking actions to address those adverse impacts	E1-3 Actions related to climate change E2-2 Actions related to pollution E3-2 Actions related to water E5-2 Actions and resources related to resource use and circular economy S1-4 Actions relating to own workforce S2-4/S3-4 Actions relating to the value chain G1-2 Management of relationships with suppliers G1-3 Prevention and detection of corruption and bribery
Tracking the effectiveness of these efforts and communication	Targets: E1-4 Ambitions related to climate change E2-3 Ambitions related to pollution E3-3 Ambitions related to water E5-3 Ambitions related to resource utilisation and circular economy S1-5 Ambitions related to own workforce S2-5/S3-5 Ambitions related to the value chain G1 Ambitions related to corporate policy and culture Metrics: E1-5 Energy consumption and energy mix E1-6 Gross GHG emissions in Scope 1, 2 and 3 categories and total GHG emissions E2-4 Air, water and soil pollution E3-4 Water consumption E5-4 Resource inflows E5-5 Waste S1-6 Characteristics of the organisation's employees S1-7 Characteristics of non-employees in the company's own workforce S1-8 Collective bargaining coverage and social dialogue S1-9 Diversity parameters S1-12 People with disabilities S1-13 Training and skills development S1-14 Health and safety S1-17 Incidents, complaints and severe impacts related to human rights G1-4 Incidents of corruption and bribery

Risk management and internal controls over sustainability reporting

ESRS 2-GOV-5-36-(a); ESRS 2-GOV-5-36-(b); ESRS 2-GOV-5-36-(c); ESRS 2-GOV-5-36-(d); ESRS 2-GOV-5-36-(e)

LEHVOSS has established a comprehensive risk management system that is continuously expanded to include sustainability risks. Overall responsibility for the risk management system rests with the Executive Board of LuV KG. This responsibility includes, above all, defining the risk strategy and establishing the framework for appropriate control actions within the risk management system. In addition, the Head of Legal & Sustainability supports risk owners, including department heads and managing directors, in identifying, assessing and managing risks. The Risk Management Officer plays a key role and reports directly to the Executive Board as part of the annual legal report, among other things.

In order to identify sustainability risks at an early stage, LEHVOSS conducted a broad-based risk analysis in 2024. The risk analysis is described in detail in the Management of impacts, risks and opportunities section in the Value chain chapter. Based on this analysis, we pursue targeted mitigation strategies differentiated by areas of action:

- In the areas of climate change and environmental pollution, we focus on flood protection actions, CO₂-reduction, the development of more environmentally friendly products and the introduction or further development of an ISO 14001-certified environmental management system in our production sites. A climate risk analysis will also help us to identify our climate-related physical and transitory risks and opportunities.
- For our supply chain and procurement management, we plan to establish a risk-based due diligence process, sustainable procurement guidelines and regular supplier audits.
- We want to reduce risks associated with working conditions and human rights through an occupational health and safety management system, targeted training and an anonymous whistleblower system, among other things.
- To prevent corruption, we have set up mandatory training courses and regular due diligence audits. We also use our anonymous whistleblower channel for this purpose.

The internal control system (ICS) is used to systematically manage sustainability activities. Its overarching aim is to ensure that legal and internal company regulations are complied with, corporate values are protected, risks are recognised and managed at an early stage and operational processes function efficiently and without error. Within this framework, we assign clear roles and responsibilities to our specialists and managers and monitor the extent to which sustainability aspects are integrated into the strategy and business model. In addition, we have established a systematic procedure for identifying and managing impacts, risks and opportunities and have set up processes to regularly review key performance indicators and targets.

The results of the risk analyses and internal controls are also systematically incorporated into the Sustainability Statement. To ensure the quality and reliability of our sustainability data, we have implemented detailed process descriptions for data collection, validation and reporting. Specific control mechanisms are also designed to ensure that our reporting contains relevant, precise, comparable and verifiable information. Our sustainability team coordinates the reporting process together with the topic managers, with data entry and validation organised according to the dual control principle. This is accompanied by training and a methodology manual to ensure the quality and consistency of reporting. Further information about our sustainability organisation can be found in the section *The role of the administrative, management and supervisory bodies*.

Strategy

Strategy, business model and value chain

ESRS 2-SBM-1-40-(a)-i; ESRS 2-SBM-1-40-(a)-ii; ESRS 2-SBM-1-42; ESRS 2-SBM-1-42-(a); ESRS 2-SBM-1-42-(b); ESRS 2-SBM-1-42-(c)

LEHVOSS is a company with over 130 years of experience in the procurement and distribution of chemical and mineral specialities. In addition to the traditional trading business, we offer customised solutions, including logistical services and product-related developments. Our own laboratories, technical development resources and production capacities are available for this purpose.

Our business model is based on the three pillars of trading, distribution, and production, and is divided into the business areas of plastics and rubber, speciality chemicals, industrial minerals and life science. LEHVOSS markets over 6,500 products to more than 7,000 customers. Headquartered in Hamburg, the company has 14 subsidiaries worldwide, including four production sites in Germany, China and the USA, and employs more than 600 people. The following table shows the number of LEHVOSS employees by country:

Total number of employees by head count (HC)¹

ESRS 2-SBM-1-40-(a)-iii; ESRS 2-SBM-1-40-(g)

Country	Number of employees in HC
Germany	444
China	60
Italy	52
United Kingdom	43
France	25
USA	19
Spain	9
Netherlands	3
Switzerland	3
Poland	2
South Korea	2
Total employees	662

¹ Including inactive employees, employees on long-term sick leave and employees on parental leave

Our value chain encompasses all stages from procurement and production through to distribution, utilisation, and application of our products. Upstream, we procure over 350 product groups — including petrochemical and mineral products, packaging materials, and services—from more than 1,300 suppliers in Europe and beyond.

LEHVOSS produces materials and additive preparations in its own operation according to customer requirements. We offer a wide range of products and services for various industries. The main product groups include thermoplastic compounds, plastic additives, magnesia and industrial minerals, cosmetic raw materials, raw materials for lubricants, rubber chemicals and materials for paints, coatings and construction chemicals. Our portfolio also includes products from the pharmaceutical, nutritional supplements and food sectors as well as filter aids. In-house production accounts for around 30 per cent of our turnover.

In addition to our extensive product portfolio, we offer various services. These include the development of application-specific formulations according to individual customer requirements, targeted research and development as well as comprehensive advice and support for the introduction of new products. Our business model also includes chemical trading, in which raw materials are sold unchanged under our own brand, and chemical distribution, in which we have (mostly) exclusive agreements with supply partners and market products under their brand.

Downstream, the products are used as mixtures in the processing industry, for example in the manufacture of plastics, rubber and paints, as well as in applications such as lubricants, adhesives and cosmetics. LEHVOSS serves more than 80 customer groups

from industry, the manufacturing sector and the chemicals trade. Consumers and end customers are not part of this group. The largest customer industries include cosmetics, plastics, food supplements, lubricants and pet food. We are active in 87 countries; our most important sales markets are Germany, Italy and China.

Substances from the LEHVOSS portfolio that are significantly related to sustainability aspects include substances of very high concern (SVHC), microplastics and perfluorinated and polyfluorinated alkyl substances (PFAS). We are currently preparing a quantitative analysis of these substances within our portfolio. The handling of SVHC is the subject of ongoing regulatory processes. However, their use is not currently subject to a ban in our sales markets. The same applies to microplastics, the use of which as an industrial product is currently neither restricted nor prohibited. The planned EU restriction on PFAS is currently in the decision-making phase. PFAS play a particularly important role in the areas of filtration, CPM (customised polymer materials), plastics and additives, as well as in subsidiaries that offer plastic products.

Sustainability strategy

ESRS 2-SBM-1-40-(e)

We aim to achieve profitable growth in harmony with ecological, social and ethical principles. The seamless integration of sustainability into our strategy and management processes takes centre stage. The Executive Board has established a clear framework for the consistent implementation of our sustainability strategy, which defines targets and actions for strategic management.

The sustainability strategy includes our various business activities and geographical regions, customer groups and other stakeholders. Our sustainability managers are responsible for the ongoing monitoring of regulatory requirements so that our focus can be adjusted if necessary. They record and evaluate the achievement of targets in the business and service units as well as in the subsidiaries and document the results in regular reports. At the same time, they manage all processes relating to the LEHVOSS Sustainability Statement. In order to systematically record and continuously optimise our sustainability performance, we want to introduce comprehensive, standardised and automated processes for data collection and assessment. Our existing ICS is intended to ensure the quality and reliability of all reports.

In terms of content, our sustainability strategy focuses on the following areas of action:

- Climate change mitigation and resource efficiency: reducing CO₂ emissions, preventing pollution, promoting the circular economy and increasing resource efficiency.
- Attractive working conditions: Strengthening fair and forward-looking working conditions and responsibility towards the workforce.
- Sustainable procurement: Implementing a sustainable supply chain strategy.
- Portfolio analysis: assessing our products from a sustainability perspective.

At this point, we would like to emphasise various key priorities that we have recently prioritised. For example, a central goal of our sustainability strategy is the consistent reduction of our specific CO₂-emissions across all three scopes. To this end, we have set various milestones for the entire LEHVOSS Group, which we aim to achieve by focusing on renewable energies and energy-efficient renovations, among other things. Further information on this can be found in the Climate change chapter.

For a circular economy, we have set ourselves the goal of increasing the proportion of renewable raw materials in our portfolio and significantly intensifying the use of recycled materials. More information on this can be found in the section Ambitions in relation to resource utilisation and the circular economy under Circular economy. In order to also make our procurement processes more sustainable, we want to adopt a Group-wide guideline and introduce a risk-based due diligence process along our value chain. Details on this can be found in the section Ambitions in relation to the value chain in the Value chain chapter.

At the same time, we focus on the well-being of our employees, which is why we want to optimise working conditions with further health actions, training opportunities and initiatives for equal opportunities and diversity. Specific information on this can be found in the Own Workforce chapter.

Turnover by sector (in € thousand)¹

ESRS 2-SBM-1-40-(b)

Sector according to financial reporting	Turnover in k€	Turnover in%
CPM	93,512	20.8%
Magnesia	78,800	17.5%
Personal Care	58,324	13.0%
Functional Fluids	49,916	11.1%
Plastic Additives	42,911	9.5%
LUVOMAXX	39,414	8.8%
Coating Solutions	34,434	7.7%
Nutrition	32,929	7.3%
Filtration	18,636	4.1%
Other	694	0.2%
Total	449,570	100.0%

¹ The sectors listed in the table correspond to those used in LEHVOSS's financial reporting, not the ESRS sector definitions.

Stakeholder interests and views

ESRS 2-SBM-2-45-(a); ESRS 2-SBM-2-45-(a)-i; ESRS 2-SBM-2-45-(a)-ii; ESRS 2-SBM-2-45-(a)-iii; ESRS 2-SBM-2-45-(a)-iv; ESRS 2-SBM-2-45-(a)-v; ESRS 2-SBM-2-45-(d)

We regard stakeholder engagement as a dynamic process, which we are continuously developing. As part of our materiality analysis, we conducted and evaluated surveys and interviews with our key stakeholders. The purpose of this engagement is to understand their perspectives and expectations, and to integrate them into the company's decision-making processes.

Our most important internal and external stakeholders:

Employees and employee representatives: Communication with employees and members of the works council takes place via the intranet, the LEHVOSS environmental blog, emails, staff meetings and regular meetings between Executive Board and the works council.

Shareholders and Advisory Board: These are regularly informed about sustainability aspects, goals, targets and actions. Communication occurs via emails, telephone and meetings.

Financial institutions and insurance companies: We regularly provide these groups with information on current developments and requirements in order to strengthen LEHVOSS's financial stability and risk management strategies.

Legislators and authorities: Direct communication on regulatory requirements and current issues is carried out by site managers via e-mail, telephone, by post and during on-site meetings

Customers and suppliers: These stakeholders are involved in dialogue through company visits, trade fairs, and digital platforms to ensure their requirements and expectations are considered.

Public and press: Project and event-related communication takes place via publications and media activities to keep the public informed.

Neighbours and residents: Transparency and acceptance are to be promoted through targeted information channels and the company website.

The administrative, management and supervisory bodies are regularly informed about the views and interests of stakeholders with regard to the company's sustainability-related impacts. Regular meetings and reports are an important part of this information flow. The Steering Committee, which meets approximately every two months and includes sustainability managers and the Executive Board, plays a key role in integrating relevant findings into corporate strategy. Information is also incorporated into strategic decision-making via works meetings and meetings of the Economic Committee of the LuV KG Works Council, which are held two to three times a year. Customers and suppliers are supported by the operational departments, which gather key expectations and communicate these to the Executive Board in summarised form.

In addition, reporting on sustainability aspects is carried out once a year as part of existing specialised reports to the administrative, management and supervisory bodies. They include reports from the areas of legal, human resources (HR), hazardous goods, safety and environmental protection as well as data protection. They include, for example, information on accident statistics, training and compliance violations.

Management of impacts, risks and opportunities

Description of the process for identifying and assessing material impacts, risks and opportunities

ESRS 2-IRO-1-53-(a); ESRS 2-IRO-1-53-(b); ESRS 2-IRO-1-53-(b)-i; ESRS 2-IRO-1-53-(b)-ii; ESRS 2-IRO-1-53-(b)-iii; ESRS 2-IRO-1-53-(b)-iv; ESRS 2-IRO-1-53-(c); ESRS 2-IRO-1-53-(c)-i; ESRS 2-IRO-1-53-(c)-ii; ESRS 2-IRO-1-53-(c)-iii; ESRS 2-IRO-1-53-(d); ESRS 2-IRO-1-53-(e); ESRS 2-IRO-1-53-(f); ESRS 2-IRO-1-53-(g)

LEHVOSS conducted its first double materiality analysis in accordance with the European Sustainability Reporting Standards (ESRS) in 2024. We considered both impact materiality and financial materiality. The aim was to prepare LEHVOSS for the requirements of the Sustainability Statement in accordance with the Corporate Sustainability Reporting Directive (CSRD) involving relevant internal departments and external stakeholders and to fulfil the associated ESRS requirements for dual materiality. In accordance with the requirements of the CSRD and ESRS, we intend to review the relevance and currency of the materiality analysis and its results annually with regard to significant changes and update them if necessary. The reviews relate to changes in the organisational and operational structure of LEHVOSS or to external factors that have an influence, such as those affecting our supply chains. Regardless of significant changes, the materiality analysis will be comprehensively reviewed approximately every five years. The double materiality analysis carried out in 2024 extended over several phases. Its overall process and the methodology used are described below.

Inventory analysis

In a first step, we conducted an initial inventory and compiled a list of relevant topics and developed a value chain profile. The aim was to gain an overview of existing guidelines and actions relating to sustainability and to obtain information on LEHVOSS's most important suppliers and customers, the locations and associated activities.

The documents were provided by our responsible specialists and served as a key information basis for creating the profile of the value chain and analysing the impacts, risks and opportunities (IROs).

LEHVOSS took the entire value chain into account when determining and assessing the IROs. Due to the diversity of our business areas and product groups, we focused on those activities with the greatest economic and social impact. We used two criteria for prioritisation: the importance of the activities for the business model and their relevance for the environment and society. Smaller product groups that tend to have a major impact were also included. A detailed description of our value chain can be found in the Strategy, business model and value chain section.

Based on the value chain profile and the inventory analysis, we have drawn up a list of topics in accordance with ESRS 1 Annex C, which is intended to cover the various dimensions of sustainability as part of the materiality analysis. In carrying out the materiality process, LEHVOSS considered all of the topics identified by the ESRS in order to identify those with the highest relevance in terms of

impact and financial risks and opportunities for reporting. During the process described here, all identified IROs were assigned to the ESRS topic set.

Impact materiality

The subsequent assessment of impact materiality was designed to capture both actual and potential impacts of LEHVOSS on the environment, society and human rights across the entire value chain. For the systematic assessment, we used an Excel-based analysis tool that structured the various ESRS sub-topics and stages of the value chain.

The mapping of the value chain profile which was defined and validated at the beginning of the process, formed the basis for identifying the impacts of LEHVOSS: The most relevant and/or high-risk raw materials and commercial products, production sites, best-selling products and key customer industries and customer countries listed there defined the focus of the analysis. In addition to the value chain profile, LEHVOSS used all of its primary data from the inventory analysis as well as supplementary secondary literature, e.g. scientific publications, NGO reports or sector and association reports, to determine the impacts. We also included the results of the stakeholder engagement process, which is described in more detail below. The risk analysis carried out in parallel to the materiality analysis looked at country and sector risks in the upstream value chain and also served to identify our impacts.

Based on the information available, we categorised each impact as positive or negative and actual or potential. We categorised potential impacts as having a time horizon in which they could occur. We categorised them as short-term (up to one year), medium-term (two to five years) and long-term (over five years).

To assess the identified impacts, at least one specialist from the LEHVOSS departments was assigned to each impact. The specialist areas assessed the impact in terms of severity and probability of occurrence. The degree of severity refers to the negative impacts and is determined on the basis of extent, scope and remediability. Positive impacts, on the other hand, were assessed solely on the basis of extent and scope. The probability of occurrence was determined for potential impacts, but not for actual impacts, as these have already occurred. The assessment scheme followed the ESRS guidelines and used a five-point scale for severity and probability of occurrence. The values determined served as the basis for determining materiality and were further processed in a structured analysis process.

Financial materiality

The subsequent analysis of financial materiality was conducted to identify and assess financial risks and opportunities that arise for LEHVOSS in connection with sustainability issues. In doing so, we analysed which sustainability-related aspects could affect the company's enterprise value in the short, medium or long term. The risk management analysis also helped to take ESG risks into account in business planning.

The presentation of the value chain profile which was defined and validated at the beginning of the process, formed one of the foundations for the assessment of financial materiality. Central internal sources were the LEHVOSS risk inventory and the results of the impact materiality. We used these to derive financial risks and opportunities that resulted or could result from the negative or positive impacts. In addition, we used information from interviews with financial institutions and secondary literature such as scientific publications, NGO reports and sector and association studies to identify further risks and opportunities.

The structured assessment according to ESRS subtopics and stages of the value chain was again carried out using an Excel-based analysis tool. We integrated the identified risks and opportunities into LEHVOSS risk management and assigned them to our existing risk and opportunity categories. In addition, we estimated the time horizon in which the risks and opportunities could be expected to materialise based on the available information. The definitions followed those of the time horizons in the context of impact materiality.

The risks and opportunities were assessed using a standardised scoring model. Each identified risk or opportunity was assessed by LEHVOSS risk management in terms of its extent and probability of occurrence. A threshold value of € 750,000 was used as the threshold for materiality. Risks and opportunities that reached this value were classified as material and validated by the Executive Board. The assessment scheme for financial materiality was taken from LEHVOSS risk management and corresponded to our corporate guidelines. We used a five-point scale to assess the extent of the financial effects, while the probability of occurrence was

assessed using a six-point scale. The assessment of risks and opportunities was carried out by the Head of Legal & Sustainability, the Head of Finance and a member of the Executive Board.

Stakeholder engagement

As part of the materiality analysis steps described above, LEHVOSS engaged a range of stakeholder groups. This engagement served both to identify potential and actual negative and positive impacts, as well as financial opportunities and risks, and to assess and validate the results.

During the identification phase, we involved various internal and external stakeholders in the assessment of impacts, risks and opportunities via an online survey. The survey enabled broad involvement, including external business partners such as customers and suppliers as well as internal stakeholders such as subsidiaries and business unit management. The anonymous responses served as a starting point for analysing the value chain. In addition, we conducted four interviews - three with financial institutions to identify financial risks and opportunities and one with LuV KG's works council to assess the social and environmental impact on the workforce. The interviews followed a guideline, took place online and were documented. The findings from the survey and the interviews were used to identify the material impacts, risks and opportunities.

We involved internal experts from the LEHVOSS business and service units in the assessment of the impacts. Assignment was based on the respective responsibilities, with several experts usually involved. Prior to the assessment, the participants received a briefing on the methodology and exchanged information in several meetings.

Once the impacts, risks and opportunities had been assessed, validation was carried out by internal and external stakeholders. Firstly, the LEHVOSS Advisory Board discussed the results of the materiality analysis in an interview. In a subsequent workshop with the Executive Board and the heads of the business and service units, the results were presented again and jointly revised. The aim was to refine the materiality results and adapt them to the LEHVOSS business model. The final findings were documented and integrated into the assessment.

Consolidation

In the final step, we consolidated material impacts identified. This was only undertaken where impacts related to the same ESRS subtopic and shared the same root causes. The material risks and opportunities were not consolidated. The final material IROs of LEHVOSS are presented at the beginning of the respective topic chapters.

Disclosure requirements included in ESRS and covered by the Sustainability Statement

ESRS 2-IRO-2-56

The following table lists the ESRS disclosure requirements applied by LEHVOSS in preparing this Sustainability Statement, as determined by the materiality analysis.

ESRS disclosure requirement	Description	Page
ESRS 2 BP-1	General principles for the preparation of the sustainability statement	5
ESRS 2 BP-2	Disclosures in relation to specific circumstances	6
ESRS 2 GOV-1	The role of the administrative, management and supervisory bodies	6
ESRS 2 GOV-2	Information and sustainability matters addressed by the organisation's administrative, management and supervisory bodies	7
ESRS 2 GOV-4	Statement on due diligence	8
ESRS 2 GOV-5	Risk management and internal controls over the sustainability statement	9
ESRS 2 SBM-1	Strategy, business model and value chain	10
ESRS 2 SBM-2	Stakeholder interests and views	12
ESRS 2 IRO-1	Description of the process for identifying and assessing material impacts, risks and opportunities	13
ESRS 2 IRO-2	Disclosure requirements included in the ESRS that are covered by the organisation's sustainability statement	16
ESRS E1 Climate Change		
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	19
ESRS E1-1	Transition plan for Climate change mitigation	20
ESRS E1-3	Actions and resources related to climate action plans	20
ESRS E1-4	Targets related to climate change mitigation and adaptation	21
ESRS E1-5	Energy consumption and energy mix	22
ESRS E1-6	Gross GHG emissions in Scope 1, 2 and 3 categories and total GHG emissions	23
ESRS E2 Pollution		
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	25
ESRS E2-1	Policies related to pollution	25
ESRS E2-2	Actions and resources related to pollution	26
ESRS E2-3	Pollution-related targets	27
ESRS E2-4	Air, water and soil pollution	28
ESRS E2-5	Substances of concern and substances of very high concern	28
ESRS E3 Water & marine resources		
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	29
ESRS E3-1	Policies related to water and marine resources	29
ESRS E3-2	Actions and resources related to water and marine resources	30
ESRS E3-3	Targets related to water and marine resources	30
ESRS E3-4	Water consumption	31
ESRS E5 Resource use & circular economy		
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	32
ESRS E5-1	Policies related to resource use and the circular economy	32
ESRS E5-2	Actions and resources related to resource use and circular economy	33
ESRS E5-3	Targets related to resource use and the circular economy	33
ESRS E5-4	Resource inflows	34
ESRS E5-5	Resource outflows	34
ESRS S1 Own Workforce		
ESRS 2 SBM 3	Material impacts, risks and opportunities and their interaction with strategy and business model	36
ESRS S1-1	Policies related to own workforce	37
ESRS S1-2	Procedures for involving own workforce and employee representatives in relation to impacts	38
ESRS S1-3	Processes for improving adverse impacts and channels through which the own workforce can raise concerns	38
ESRS S1-4	Actions taken regarding material impacts and approaches to managing material risks and capitalising on material opportunities related to the own workforce, and the effectiveness of those actions and approaches	39
ESRS S1-5	Targets related to managing material negative impacts, promoting positive impacts and managing material risks and opportunities	41
ESRS S1-6	Characteristics of the own workforce	41
ESRS S1-7	Characteristics of the organisation's external workforce	42
ESRS S1-8	Collective bargaining coverage and social dialogue	42
ESRS S1-9	Diversity parameters	42
ESRS S1-11	Social protection	43

General Disclosures		Environment	Social	Governance
ESRS S1-12	People with disabilities			43
ESRS S1-13	Metrics for training and skills development			43
ESRS S1-14	Metrics for health and safety			43
ESRS S1-16	Compensation metrics (pay gap and total compensation)			44
ESRS S1-17	Incidents, complaints and severe impacts related to human rights			44
ESRS S2 Workers in the value chain				
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model			45
ESRS S2-1	Policies related to workers in the value chain			45
ESRS S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns			46
ESRS S2-4	Actions taken regarding material impacts and approaches to managing material risks and capitalising on material opportunities related to workers in the value chain, and the effectiveness of those actions and approaches			46
ESRS S2-5	Targets related to managing material negative impacts, enhancing positive impacts and managing material risks and opportunities			47
ESRS S3 Affected Communities				
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model			45
ESRS S3-1	Policies related to affected communities			45
ESRS S3-4	Actions taken regarding material impacts on affected communities and approaches to managing material risks and capitalising on material opportunities related to affected communities, and the effectiveness of those actions			46
ESRS S3-5	Targets related to managing material negative impacts, enhancing positive impacts, and addressing material risks and opportunities			47
ESRS G1 Governance				
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model			48
ESRS G1-1	Policies relating to business conduct and corporate culture			49
ESRS G1-2	Management of relationships with suppliers			50
ESRS G1-3	Prevention and detection of corruption and bribery			52
ESRS G1-4	Incidents of corruption and bribery			53

Environment

As a manufacturer in the chemical industry, LEHVOSS bears significant responsibility for climate change mitigation and environmental protection. Upstream processes under our direct control require substantial amounts of energy and water, produce wastewater and waste, and consume resources. Accordingly, the topics of climate change, pollution, water, and the circular economy are material for LEHVOSS and are addressed in the following sections.

In the area of pollution and energy management, we have established clear management and organisational structures at all levels and in all companies in order to ensure the transparency of our commitment. The basis for this includes the requirements of DIN EN ISO 14001:2015, which have already been implemented as a certified environmental management system at LuV KG and at our production sites in China and the USA, taking into account relevant norms, standards and binding obligations. ISO 14001 has also covered the topic of climate change since 2024. At our Solingen site, we use an energy management system in accordance with DIN ISO 50001. The Group-wide introduction of energy management systems in accordance with this standard will also be an integral part of our planned policies in connection with Climate change mitigation and adaptation to climate change.

German and European legal requirements on pollution and occupational safety as well as plant and product safety also apply. Responsibility for environmental management at LuV KG lies with the Management Representative for Environment (MRE) and the Environment Management Representative. (EMR). They are currently supported by the internal 14001 team. The subsidiaries are each responsible for their own environmental management within the Group structure.

In order to keep an eye on environmental risks, we have created the necessary organisational resources for environmental and energy management at site and Group level. In addition, we have set up planning, assessment and documentation procedures and have a direct reporting chain to the respective executive management of the sites. There are Environment Management Representatives (EMR) and Energy Management Officers (EMO) at the sites, who report regularly to the respective management teams, e.g. in the form of annual reports. If necessary, EMR and EMO are supported by external consultants. The Safety and Environment service group at LuV KG is responsible for collecting metrics and reports from the subsidiaries for the Executive Board.

Detailed information on how LEHVOSS addresses the environmental and climate impact in the upstream value chain can be found in the section Policies related to the Value Chain.

Climate change

LEHVOSS's activities are associated with significant greenhouse gas (GHG) emissions, both from our own operations and across the value chain. In the upstream value chain, emissions primarily arise from the extraction and production of petrochemical and mineral substances, as well as agricultural products. Emissions from upstream and downstream logistics processes are also material. The same applies to our own operations and the downstream use of our products in energy-intensive industries. Furthermore, we have identified the use of fossil energy sources as a key driver of negative climate impacts throughout our value chain.

In order to mitigate these negative impacts, we are committed to the consistent reduction of our greenhouse gas emissions. Our goal is to address all relevant areas and to take concrete steps towards effective decarbonisation.

Our company is also increasingly affected by the consequences of climate change. For example, there are negative effects on the manufacture of primary products in the upstream value chain. There are also climate-related risks for their storage. The infrastructure used by our own operations is also exposed to climate risks, which we have to take into account in our investments.

Material impacts, risks and opportunities

ESRS 2-SBM-3-48-(a); ESRS 2-SBM-3-48-(b); ESRS 2-SBM-3-48-(c)-i; ESRS 2-SBM-3-48-(c)-ii

The following table shows the material impacts, risks and opportunities of LEHVOSS in connection with the topic of climate change that were identified as part of the dual materiality analysis.

ESRS E1 Climate change – Adaptation

Description of risk	Type	Value chain	Time horizon
Actual negative impact on climate change adaptation due to the continued extraction of oil and gas for the production of petrochemical precursors in the upstream value chain, e.g. polymers or (industrial) carbon black	Negative impact	Upstream	
Short-term stock shortages and production delays or cancellations due to climate change-induced production outages and disruptions to supply chain infrastructure	Risk	Upstream	Short term
Short-term infrastructure damage due to extreme weather events and the associated investments required to safeguard the company's own infrastructure	Risk	Own operations	Short term

ESRS 1 Climate change – Mitigation

Description of risk	Type	Value chain	Time horizon
Actual negative impacts on climate change due to greenhouse gas emissions caused by the extraction and production of petrochemicals, minerals and agricultural products in the upstream value chain	Negative impact	Upstream	
Actual negative impact on climate change due to greenhouse gas emissions in upstream and downstream logistics	Negative impact	Upstream and downstream	
Actual negative impact on climate change from Scope 1 and Scope 2 emissions (own operations)	Negative impact	Own operations	
Actual negative impact on climate change due to greenhouse gas emissions from downstream use and processing of LEHVOSS products in energy-intensive industries, e.g. the plastics, rubber and chemical industries	Negative impact	Downstream	

ESRS 1 Climate change – Energy

Description of impact	Type	Value chain	Time horizon
Actual negative impact on climate change due to high energy consumption and the use of fossil fuels in the extraction and production of petrochemical products in the upstream value chain	Negative impact	Upstream	
Actual negative impacts on climate change due to high energy consumption and the use of fossil fuels in the extraction of mineral raw materials for the production or further processing of metallic compounds in the upstream value chain	Negative impact	Upstream	
Actual negative impact on climate change due to the high energy consumption of the production and refinement processes in our Own operations	Negative impact	Own operations	
Actual negative impact on climate change due to energy consumption in the utilisation and further processing of LEHVOSS products in energy-intensive industries, e.g. the plastics, rubber and chemical industries	Negative impact	Downstream	
Actual positive impact on the reduction of energy consumption through the use of LEHVOSS Group products in the downstream value chain	Positive impact	Downstream	

Policies relating to climate change mitigation

LEHVOSS is implementing and planning a range of measures as part of its strategy to manage material impacts, risks, and opportunities associated with climate change mitigation and adaptation. The activities already undertaken are detailed in the sections Climate action and Climate ambition within this chapter.

We also intend to integrate the results of our planned climate risk assessment into the product strategies of the LEHVOSS business units and are preparing to develop suitable key performance indicators (KPIs) for this purpose. For example, we are considering introducing an average product carbon footprint for our portfolio.

As previously described, LEHVOSS has established clear management and organisational structures for energy management, which are based, among other things, on specific ISO standards. Further information can be found in the introductory section of this Environment chapter.

Management of impacts, risks and opportunities

Actions in relation to climate change mitigation

E1-3-28;E1-3-29-(a); E1-3-AR 21; E1-1-14;E1-1-16-(a); E1-1-16-(b); E1-1-16-(h); E1-1-16-(i); E1-1-17

In the reporting year, LEHVOSS began to establish a robust data basis for its climate change mitigation activities. As part of the 2023 GHG accounting, we identified several key parameters for reducing Scope 1 and Scope 2 emissions, including the procurement of electricity from renewable sources, heat recovery, and modern lighting solutions. During the reporting year, we adopted a Group-wide reduction plan that sets out the pathway to achieving our Scope 1 and Scope 2 targets. In this context, LuV KG has already allocated and approved €1 million in operating expenditure (OpEx) for the 2025 financial year to implement the first Scope 1 CO₂ reduction projects.

With the transition to 100 per cent electricity from renewable sources at LEHVOSS's German sites from 2022, we had already completed an important step towards reducing Scope 2 emissions prior to the reporting period. Our electricity is sourced from certified suppliers, who regularly confirm the CO₂-free generation of their products, with a preference for renewable energy. During the reporting period, electricity contracts at the subsidiaries LEHVOSS Italia, Iberia, and UK were also amended accordingly.

With regard to Scope 3 emissions, LEHVOSS has identified initial emission hotspots in the areas of procurement and logistics as well as in the downstream value chain as part of its GHG accounting. We plan to establish an initial reduction pathway for Scope 3 emissions by 2027.

A number of additional actions were also launched during the reporting period. For example, we have begun to expand our product portfolio to include more sustainable alternatives, focusing on both renewable raw materials and products from the circular economy. We are also working to improve data quality, particularly in relation to Scope 3.1 (purchased goods and services), as a basis for sustainable corporate management. In the reporting year, we also examined for the first time the extent to which the use of electric lorries in local logistics can be increased by freight forwarders, particularly in the Hamburg metropolitan area. Reviews of other regions are planned.

Furthermore, in the reporting year, we initiated measures at the German LEHVOSS sites to protect production facilities from the anticipated consequences of climate change. At the Wandsbek site, we conducted analyses of the drainage situation during heavy rainfall events. These analyses revealed a concrete need for action: the production halls and cellars require protection by flood barriers. We have identified and ordered suitable equipment and plan to install it at the relevant locations in 2025.

Ambitions in terms of climate change mitigation

E1-4-32; E1-4-33

All GHG scopes

Our Climate change mitigation activities are guided by the following overarching ambition: LEHVOSS aims to become carbon neutral along the entire value chain (Scope 1, Scope 2, Scope 3) by 2050 at the latest.

Scope 1 and 2 emissions

LEHVOSS has set the target of reducing its Scope 1 and Scope 2 GHG emissions by 53 per cent by 2030, with the aim of achieving carbon neutrality in these areas by 2035. The following interim targets have been set:

- By 2026, all subsidiaries will assess the feasibility and cost-effectiveness of switching to electricity from renewable sources.
- By 2035, we aim to install photovoltaic systems on all suitable roof surfaces. The owner of the buildings used by WMK Plastics is planning this for 2025; the electricity generated will be offered to WMK Plastics for its own use.
- By 2030, we intend to switch entirely from heating buildings with fossil fuels to district heating or renewable heating sources. At the Wandsbek plant, we plan to use waste heat from production to support building heating. The owner of the buildings used by WMK Plastics is planning to replace gas heating systems with heat pumps in 2025.
- In 2025, we will also begin refurbishing buildings to improve energy efficiency.
- By 2027, modern, demand-controlled LED lighting will be installed in buildings and outdoor areas at LuV KG and our German sites.
- As early as 2026, we also intend to anchor low-emission mobility as a goal in our company car policy and introduce appropriate incentives.

Scope 3 emissions

For Scope 3 emissions, LEHVOSS aims to develop a realistic reduction pathway by 2027. By then, we intend to:

- Introduce a supplier management system to further enhance data quality.
- Integrate sustainability aspects into our procurement guidelines.
- Establish guidelines to ensure that environmental aspects are systematically incorporated into decision-making processes.

Adaptation to climate change

LEHVOSS intends to make climate risks an integral part of its risk management.

In 2026, we plan to conduct a climate risk analysis for our own most important production and warehouse locations as well as for five to ten selected procurement regions. The results will be evaluated as part of our overall risk management and used to create an action plan if necessary.

By 2027, we aim to develop a concept for rainwater retention at the Wandsbek site to prevent flooding.

Metrics

Energy consumption and energy mix

E1-5-37-(a); E1-5-37-(b); E1-5-37-(c)-i; E1-5-37-(c)-ii; E1-5-37-(c)-iii; E1-5-38-(a); E1-5-38-(b); E1-5-38-(c); E1-5-38-(d); E1-5-38-(e); E1-5-40; E1-5-42; E1-5-43

Change	2023 (MWh)	2024 (MWh)	compared to 2023 (%)
Total energy consumption (direct and indirect)	13,562	13,015	-4%
1.1 Total energy consumption from fossil sources (direct and indirect)	4,824	5,369	11%
1.2 Total energy consumption from nuclear sources (direct and indirect)	133	168	26%
1.3 Total energy consumption from renewable sources (direct and indirect)	8,605	7,478	-13%
1.4 Total energy consumption from direct sources	3,344	3,776	13%
1.4.1 Fossil sources	3,344	3,776	13%
1.4.1.1 Fuel consumption from coal and coal products	n/a	n/a	n/a
1.4.1.2 Fuel consumption from crude oil or petroleum products	1,877	2,257	20%
1.4.1.3 Fuel consumption from natural gas	1,445	1,519	5%
1.4.1.4 Fuel consumption from other fossil sources	21	n/a	n/a
1.4.2 Renewable sources	n/a	n/a	n/a
1.4.2.1 Biomass	n/a	n/a	n/a
1.4.2.2 Biofuel	n/a	n/a	n/a
1.4.2.3 Biogas	n/a	n/a	n/a
1.5 Total energy consumption from indirect sources	10,218	9,239	-10%
1.5.1 Fossil sources	1,480	1,593	8%
1.5.1.1 Purchased electricity from fossil sources	1,480	1,593	8%
1.5.1.2 Purchased heat from fossil sources	n/a	n/a	n/a
1.5.1.3 Purchased steam from fossil sources	n/a	n/a	n/a
1.5.1.4 Purchased cooling from fossil sources	n/a	n/a	n/a
1.5.2 Nuclear sources	133	168	26%
1.5.3 Renewable sources	8,605	7,478	-13%
1.5.3.1 Purchased electricity from renewable sources	8,605	7,473	-13%
1.5.3.2 Purchased heat from renewable sources	n/a	n/a	n/a
1.5.3.3 Purchased steam from renewable sources	n/a	n/a	n/a
1.5.3.4 Purchased cooling from renewable sources	n/a	n/a	n/a
1.5.3.5 Purchased hydrogen from renewable sources	n/a	n/a	n/a
1.5.3.6 Consumption of self-generated renewable energy	n/a	5	n/a
2. Energy intensity (in MWh/million €)¹	26.3	29.0	10%
2.1 Net sales (in € million)	515	449	-13%

¹ Energy intensity is calculated based on total sales revenue for the respective year (no reconciliation statement required). In-house production (compounding) is indirectly assigned to the chemical industry, and the trade in speciality chemicals and (calcined) minerals (comparable to cement) is also considered a climate-intensive sector. Thus, LEHVOSS's entire business model is based on economic activities within these sectors.

Gross GHG emissions (Scope 1, 2 and 3) and total GHG emissions

E1-6-48-(a); E1-6-49-(a); E1-6-49-(b); E1-6-51; E1-6-52-(a); E1-6-52-(b); E1-6-53;

The following table presents the Group's gross greenhouse gas (GHG) emissions in accordance with ESRS E1-6, including Scope 1, Scope 2, and Scope 3 emissions, as well as total GHG emissions. The data are reported both on a market-based and location-based approach.

	2023 (tonnes CO ₂ e)	2024 (tonnes CO ₂ e) ¹	Change (%) ²
1a Total GHG emissions (market-based)	412,617.60	371,815.60	-10%
1b Total GHG emissions (location-based)	415,414.70	374,055.70	-10%
1.1 Scope 1 GHG gross emissions	797.50	908.3	14%
1.1.1 Stationary combustion	336.6	341.8	2%
1.1.2 Mobile combustion	460.9	566.3	23%
1.1.3 Fugitive emissions	n/a	0.3	n/a
1.2a Scope 2 GHG gross emissions (market-based)	1,105.00	1,143.60	3%
1.2a.1 Electricity consumption	1,105.00	1,143.60	3%
1.2a.2 District heating consumption	n/a	n/a	n/a
1.2b Scope 2 GHG gross emissions (location-based)	3,902.10	3,383.70	-13%
1.2b.1 Electricity consumption	3,902.10	3,383.70	-13%
1.2b.2 District heating consumption	n/a	n/a	n/a
1.3 Scope 3 GHG gross emissions	410,715.10	369,763.70	-10%
1.3.1 Purchased goods and services	322,820.80	292,599.00	-9%
1.3.2 Capital goods	800.6	645	-19%
1.3.3 Fuel- and energy-related activities (not included in Scope 1 or 2)	677.7	718.4	6%
1.3.4 Upstream transportation and distribution	22,150.80	38,979.00	76%
1.3.5 Waste generated in operations	326.7	70	-79%
1.3.6 Business travel	808.2	852.8	6%
1.3.7 Employee commuting	712.6	670.6	-6%
1.3.9 Downstream transportation and distribution	8,529.60	12,299.00	44%
1.3.12 End-of-life treatment of sold products	53,888.10	22,929.90	-57%
2a Greenhouse gas intensity (market-based, t CO₂e/million €)	801.20	828.10	3%
Greenhouse gas intensity (location-based, t CO₂e/million €)	806.63	833.09	3%
2.1 Net sales (in € million)	515	449	-13%

¹ The 2024 accounting was carried out using emission factors from 2023.

² The 2024 accounting was carried out using emission factors from 2023. Changes to the 2023 accounting result, among other things, from a revision of the emission factors in category 3.1 (Purchased goods and services) and the use of sea freight routes instead of air freight routes in categories 3.4 (Upstream transport and distribution) and 3.9 (Downstream transport and distribution). LEHVOSS aims to optimise its accounting methodology in the coming reporting year and to standardise it over time.

E1-6-AR 41

2024

Entity	Total GHG emissions (market-based)	Scope 1 GHG gross emissions	Scope 2 GHG gross emissions (location-based)	Scope 2 GHG gross emissions (market-based)	Scope 3 GHG gross emissions
LEHVOSS	371,815.70	908.30	3,383.70	1,143.60	369,763.70
Lehmann&Voss&Co. KG	254,891.70	578.00	1,499.40	1.70	254,312.00
WMK Plastics GmbH	15,543.70	65.10	356.40		15,478.60
LEHVOSS North America Inc. (PCI)	9,021.30	17.90	281.70	258.70	8,744.70
LEHVOSS New Material (Kunshan) Co. Ltd.	12,026.30		977.90	856.30	11,170.00
LEHVOSS UK Ltd.	21,606.50	12.50	6.60		21,594.00
LEHVOSS Italia S.r.l.	29,506.20	90.50	40.10	16.20	29,399.50
LEHVOSS France S.A.R.L.	16,546.00	96.10	0.40	0.10	16,449.80
LEHVOSS (Shanghai) Chemical Co. Ltd.	11,842.30		10.80	9.40	11,832.90
LEHVOSS Korea Ltd.	12.00	0.60	0.70	0.70	10.80
LEHVOSS C.D. IBERIA S.L.U.	733.70	14.10	0.40	0.10	719.50
LEHVOSS Nederland B.V.	15.70	5.00	0.20		10.60
LEHVOSS Schweiz GmbH	15.90	6.20			9.70
LEHVOSS Polska Sp. z. o.o.	19.80	5.00	0.50	0.50	14.30
Easicomp GmbH	34.70	17.40	208.40		17.30

Pollution

The responsible use of resources and raw materials is a fundamental aspect of our environmental management. Although we are committed to strict due diligence obligations and safety standards, substances of concern and other environmentally harmful substances may still be released into soil, air, and water in our own operations as well as in upstream and downstream processes. These include exothermic propellant products, perfluorinated and polyfluorinated chemicals (PFAS), and microplastics.

We are actively committed to controlling and reducing the associated impacts of pollution and strive to identify solutions to optimise our procedures and processes through Group-wide dialogue. At the same time, we are continuously working to develop environmentally friendly and resource-efficient products, and to substitute problematic substances in our product portfolio. We maintain intensive communication along our value chain to raise awareness among suppliers and customers and to minimise negative effects on air, water, and soil at all stages.

Material impacts, risks and opportunities

ESRS 2-SBM-3-48-(a); ESRS 2-SBM-3-48-(b); ESRS 2-SBM-3-48-(c)-i; ESRS 2-SBM-3-48-(c)-ii

The following table shows the material impacts, risks and opportunities of LEHVOSS in connection with the topic of environmental pollution that were identified as part of the double materiality analysis.

ESRS E2 Pollution - Substances of concern and substances of very high concern

Description	Type	Value chain	Time horizon
Potential short-term negative impacts on the environment and human health from the use of perfluorinated and polyfluorinated chemicals (PFAS) in the extraction of fossil and mineral resources in the upstream value chain	Negative impact	Upstream	Short term
Potential medium-term negative impacts on the environment and humans due to the use of perfluorinated and polyfluorinated chemicals (PFAS) in production and application development, particularly at the production and production and finishing site in the USA	Negative impact	Own operations	Medium term
Potential medium-term negative impact on the environment and people due to the use of exothermic substances in application development and in the production of blowing agents for plastics	Negative impact	Own operations	Medium term
Potential short-term negative impact on the environment and people due to the release of perfluorinated and PFAS during the utilisation phase, e.g. of plastic products	Negative impact	Downstream	Short term
Medium-term market changes due to legal regulations (e.g. restrictions or authorisations under the EU REACH Regulation) of substances or substance groups	Risk	Downstream	Medium term

ESRS E2 Environmental pollution - microplastics

Description	Type	Value chain	Time horizon
Actual negative impact on the environment from the release of microplastics in the utilisation phase of LEHVOSS products	Negative impact	Downstream	

Policies related to pollution

E2-1-14; E2-1-15-(b); E2-1-15-(c)

We are committed to systematically addressing the impacts of our business activities on ecosystems and therefore take a structured approach to pollution. Our sustainability strategy focuses on climate, substances of concern, microplastics, and the circular economy. We follow the principles of this strategy to prevent pollution and to manage hazardous substances and microplastics responsibly.

Our certified environmental management system (EMS) forms the foundation for the ongoing improvement of our environmental performance and for the systematic recording, evaluation, and management of environmentally relevant processes. The EMS was

revised in 2024, during which we re-examined the fundamental elements of our environmental management and defined new priorities. As a result, we developed updated environmental targets.

A core element of environmental and chemical management at LEHVOSS is the responsible handling of substances of very high concern (SVHC), PFAS, and microplastics. Our objective is to minimise risks along the value chain, comply with legal requirements, and – where technically and economically feasible – assess sustainable alternatives. In line with regulatory requirements, we are not currently obliged to substitute SVHC or microplastics at our sites. We continuously monitor relevant developments at European and international level and adapt our policies as necessary.

One of our key raw materials, the blowing agent azodicarbonamide (ADCA), is classified as a SVHC under the European Chemicals Regulation on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). Due to its specific technical properties and functionality, the substance is currently almost impossible to replace and continues to play an important role in our supply chain. Our market partners have also not expressed any concerns regarding its use to date. Possible alternatives for PFAS and related substance groups are currently under development, with internal working groups carefully examining their use and substitution in terms of technical feasibility, safety and sustainability.

A comprehensive analysis of restrictions and bans outside Europe is planned from 2026. Microplastics are currently defined as various products in the EU and worldwide. However, they are not subject to any restrictions, as they are industrially manufactured products that typically acquire their microplastic status through customer use, for example, through remodelling. The LEHVOSS Group takes a responsible approach to the issue of microplastics and is constantly developing its processes and actions to minimise microplastic emissions.

We have implemented strict internal regulations regarding the storage of hazardous substances. Although our companies are not classified as hazardous incident facilities (as defined, for example, by German legislation), we have established processes to monitor air and soil pollution and to regularly review our status as a non-incident facility. These processes – such as increased cleaning frequencies or sealing measures – are described in an internal procedure and primarily relate to the quantities of substances stored, ensuring that LEHVOSS remains below the legal thresholds.

In addition to our environmental management, we also follow clearly defined quality management processes for product development and the introduction of new products. These are designed to ensure that we systematically review and take into account regulatory requirements as well as environmental and sustainability aspects.

Management of impacts, risks and opportunities

Actions relating to pollution

E2-2-18

LEHVOSS uses targeted actions to protect the environment and comply with the associated regulatory requirements. No violations of legal regulations, reportable pollution or leaks were recorded at any site during the reporting period. We have been introducing safety precautions in the relevant facilities for the manufacture and provision of our products for several years in order to prevent critical substances from leaking into the soil, water and/or air in the event of a spill. All employees working in this area are trained at least once a year in dealing with operational incidents. We also carry out regular drills at the sites, also involving the local emergency services.

With regard to the EU's REACH regulation, LEHVOSS has implemented various measures to ensure the compliance of imported and supplied materials. For example, the company operates a system for monitoring and controlling the quantities of chemical substances to ensure that imports meet REACH requirements.

Information on certain regulated substances is already communicated via our supplier self-disclosure process or through customer-specific statements containing statements on substances of very high concern. We also proactively engage with suppliers on REACH-related matters on a regular basis. In addition to a wide range of specific regulatory topics, our supplier questionnaire

also includes queries on conflict minerals, as appropriate. The introduction of an IT-supported supplier relationship management tool is intended to automate and streamline these queries.

Substances of concern and substances of very high concern

Transparent communication with our customers is an important part of our responsible chemicals management. Upon request, LEHVOSS provides comprehensive information on the use of PFAS and shares knowledge of the alternatives currently under development. In this way, we respond specifically to the information needs of our customers and further strengthen the careful management of substances of concern and substances of very high concern.

LEHVOSS also proactively distributes out safety data sheets in various languages, both for substances of very high concern and for products not classified as hazardous.

The safety data sheets are available to all employees across the Group, alongside operating instructions for substances of (very) high concern. We also keep and update a register of hazardous substances. Our control processes also identify SVHC and CMR substances i.e., substances classified as carcinogenic, mutagenic, or toxic to reproduction ensuring that development and product management are made aware of these substances and are encouraged to assess their substitution.

To ensure the safe and environmentally responsible disposal of hazardous substances and mixtures, LEHVOSS works with certified waste management companies throughout the Group.

Microplastics

The LEHVOSS product portfolio includes plastic-based products such as masterbatches and compounds, some of which fall under the definition of microplastics in the current European regulation on the restriction of microplastics (Regulation (EU) 2023/2055). As an extension of the REACH Regulation, it prescribes certain information and reporting obligations for our production sites and requires the development and implementation of procedures for the quantitative analysis and reporting of microplastics. As LEHVOSS products are manufactured or processed in production sites, they are only subject to the information and reporting obligations to the European Chemicals Agency from 2026 onwards regarding substances placed on the market and losses and may continue to be used without restriction.

We prepare Group-wide safety data sheets for every product that meets the definition of microplastics. In future, these will be supplemented with additional information in order to fulfil the REACH requirements in connection with the handling of microplastics.

With regard to microplastics, we also inform our customers about chemical regulations and product properties, for example via product statements.

Ambitions in relation to pollution

E2-3-22; E2-3-23-(d); E2-3-25

Substances of concern and substances of very high concern

We focus on identifying and reducing potentially harmful substances in our production processes and products through innovative approaches, with the aim of promoting more environmentally friendly alternatives over the long term. To this end, we have set ourselves the following (voluntary) target:

By the end of 2028, we aim to establish systematic processes for the robust assessment and identification of substances of concern and substances of very high concern. These processes will also serve as the basis for developing alternative options.

To ensure compliance with applicable requirements, since 2025 we have been developing processes to assess the Group's portfolio of traded and distributed products as well as raw materials, thereby strengthening the long-term resilience of our business model. As part of this, we analyse regulatory developments and compare them with commercial product information. If critical products are

identified as a result of current or anticipated regulatory changes, we will intensify our dialogue with suppliers to explore potential alternatives, substitution options, and related commercial opportunities.

From 2026, we also plan to implement a Group-wide standardised and documented process for evaluating the substitution of substances of very high concern, taking into account both commercial and regulatory aspects and prioritising the development of safer alternatives.

Microplastics

To reduce the negative effects of microplastics on people and the environment, we require sound knowledge of their occurrence. We have therefore set the following (voluntary) targets:

- By the end of 2025, we aim to systematically identify and analyse microplastic products across the LEHVOSS Group through a new Group-wide process. This process is designed not only to improve the identification of relevant materials, but also to enhance our understanding of their impacts (including emissions during processing and transport). In this way, we aim to ensure greater internal transparency and, at the same time, fulfil the REACH requirements for microplastics.

The next step will focus on the effects of plastic granulate:

- By the end of 2028, we have set the (voluntary) goal of developing processes to identify and minimise environmental releases from microplastic products, thereby laying the foundation for more extensive (binding) regulatory reporting and information obligations.

To achieve this, we plan to establish internal process descriptions and procedures at LuV KG from the end of 2025 and to implement awareness-raising and training measures. In doing so, we will be guided by the requirements of the Operation Clean Sweep® (OCS) programme to prevent the loss of plastic particles along the downstream supply chain. From 2026 and 2027, these processes will be extended to relevant subsidiaries (WMK Plastics and LEHVOSS in China and the USA).

The ambitions described here regarding substances of (very) high concern and microplastics are voluntary and not mandated by statutory regulations. However, our microplastics-related initiatives are aligned with the REACH restriction requirements for microplastics (see the Actions section in this chapter).

Metrics

Microplastics

Quantity of microplastics produced and used (tonnes, t)

E2-4-28-(b)

Microplastics produced	17,797.00
Microplastics used	11,332.00

¹ The reported quantities include microplastic products sold by the LEHVOSS Group, excluding LEHVOSS UK. For certain sites, the data are based on estimates. LEHVOSS is committed to optimising the data collection process in the coming reporting year.

Substances of concern and substances of very high concern

E2-5-34; E2-5-35

Currently, no data are available for substances of concern or substances of very high concern. In the reporting year, LEHVOSS prepared an internal working paper to establish the necessary processes for collecting the missing data on these substance groups. This includes specific steps and assigned responsibilities to address the data gaps.

Water

Water is of great importance to our value chain. Our in-house production is relatively water-efficient and fully compliant with legal requirements, thereby avoiding environmental pollution. However, activities along our value chain are more significant: the extraction of raw materials—including crude oil and natural gas—for mineral, petrochemical, or agricultural products that we trade, sell, or produce is associated with high water consumption in countries of the global South.

In regions of South America and Asia where LEHVOSS sources its raw materials, water extraction for these processes can have negative environmental impacts. We are aware of our responsibility and strive to implement sustainable procurement practices. However, due to the complexity of supply chains, LEHVOSS has only indirect influence and cannot fully prevent the sourcing of raw materials from water-stressed areas with limited water reserves. We therefore require our business partners to take responsibility for the water footprint of their supply chains and leverage our strong trading relationships to promote responsible water management.

Material impacts, risks and opportunities

ESRS 2-SBM-3-48-(a); ESRS 2-SBM-3-48-(b); ESRS 2-SBM-3-48-(c)-i; ESRS 2-SBM-3-48-(c)-ii

The following table shows the material impacts, risks and opportunities of LEHVOSS in connection with the topic of water that were identified as part of the double materiality analysis.

ESRS E3 Water and marine resources - Water

Description	Type	Value chain	Time horizon
Actual negative impacts on water availability for local ecosystems and communities resulting from the extraction and production of petrochemical, mineral, and agricultural products in countries experiencing extreme water stress.	Negative impact	Upstream	

Policies related to water

E3-1-11

LEHVOSS is preparing a Group-wide water strategy for the coming year, which will provide the framework for our ongoing and future actions. The main focus will be on our own operations (see also the section Ambitions in relation to water in this chapter).

We manage water consumption in the upstream value chain through our Code of Conduct for Business Partners, which is publicly available on the LEHVOSS website and presented to new suppliers during contract negotiations. LEHVOSS encourages suppliers to explicitly commit to this code upon signing a contract or to apply an equivalent set of rules of their own. By signing, our suppliers undertake, among other things, to consciously control and monitor their water consumption as part of an appropriate environmental management system.

Wherever possible, they are expected to minimise consumption and effectively reuse or recycle water.

Wastewater must be managed responsibly, and measures must be taken to prevent the potential impact of flooding from stormwater runoff, as required by applicable law. Wastewater from operations, manufacturing processes, and sanitary facilities must be classified, monitored, inspected, and treated as required before discharge or disposal. All individuals must have access to safe drinking water and sanitary facilities at all times. Further information on this policy can be found in the section on managing relationships with suppliers.

Management of impacts, risks and opportunities

Actions relating to water

E3-2-17

The LEHVOSS Group operates in accordance with all applicable legal requirements relating to water. It monitors the discharge of wastewater into the public sewage system (including water treatment) and any impurities it may contain, ensuring full compliance with local regulations.

LuV KG's production site in Wandsbek and the LEHVOSS plants in the USA and China are certified to ISO 14001, with the aim of continuously reducing the impact of water use.

At all production sites, the LEHVOSS Group uses only water from public supply networks. There are no other sources, such as rainwater or wells. Most of the water used is sanitary wastewater, which is discharged into the public sewage system. Water contaminated with pollutants from production is disposed of in accordance with regulations.

Our production plants use tap water exclusively for direct product cooling in a closed-loop system. Cooling water that comes into direct contact with the product must be clean and free from additives to ensure hygiene standards and prevent product contamination. To avoid cross-contamination during production changes, the cooling water is replaced, especially when products are changed.

No water withdrawal is required for process cooling, which is handled via closed cooling circuits (chillers).

Ambitions with regard to water

E3-3-22; E3-3-23-(a); E3-3-23-(c)

Our ambition for water and marine resources, as set out in our current sustainability strategy, is to use water as efficiently as possible and to be committed to continuously reducing specific water use.

A detailed concept for more sustainable water management is currently being developed at site level and is scheduled for implementation by the end of 2026. To this end, we aim to define ambitious and measurable targets that will realistically optimise our business operations and, by achieving them, contribute to reducing negative impacts. A regional focus will be on solutions for LEHVOSS sites located in areas of high water stress. To manage these actions, we are planning to introduce a specific metric to track water consumption per tonne of product manufactured (m³/tonne). At our Kunshan production site in China, such a metric is already being collected. For LuV KG and our subsidiary in the USA, we also plan to define this key figure in 2025 and set initial reduction targets.

In 2025, we will also introduce a supplier relationship management tool, which will, among other things, provide the basis for collecting information from our suppliers about their water consumption in the future.

Production managers are responsible for identifying and designing appropriate actions. The scope of the strategy and the defined targets will primarily cover LEHVOSS Group's own operations, including all sites in water-stressed regions.

Metrics

Water consumption and water intensity

Water consumption in cubic metres (m³) ¹

E3-4-28-(a); E3-4-28-(b); E3-4-28-(c); E3-4-28-(d); E3-4-28-(e)

Category	Value (m ³)
Total water consumption	13,266.00
of which from water-stressed areas	5,659.00
Reclaimed and reused water	0.00
Stored water	0.00
Changes in water storage	0.00

¹ The water consumption figures are based on actual consumption data. Only for the LEHVOSS site Pawcatuck in the USA did estimates have to be used. Water stress areas were determined using the World Resources Institute (WRI).

Water intensity

E3-4-29

Water intensity (m³ per € million revenue)

Category	Value
from sites located in water-stressed areas ¹	12.59
from all sites ²	29.51

¹ Water intensity of sites in water-stressed areas: water consumption of sites in water-stressed areas in m³ (5,659.00) / sales revenue in € million (€449,570,269.00/1,000,000)

² Water intensity of all sites: water consumption of all sites in m³ (13,266.00) / sales revenue in € million (€449,570,269.00/1,000,000)

Circular economy

At a time when global supplies of raw materials are under increasing pressure and the environmental impact of waste is steadily rising, it is particularly important for LEHVOSS to promote the recyclability of its own products and minimise waste volumes.

The LEHVOSS product range includes plastic products and additives such as thermoplastic compounds, masterbatches, and additives. The recyclability of plastics is a key issue in this context. However, the required use of various additives makes recycling plastic compounds particularly complex. Furthermore, there are currently no legal requirements for take-back of plastics by manufacturers. Even though many of the materials we use are generally suitable for high-quality reuse in the post-consumer phase, we rarely receive any compounds back after use. As a result, many plastics are typically either disposed of as hazardous waste or incinerated. The same applies, for example, to polymer-, oil-, and carbon black-bound chemicals, which we process alongside a variety of other raw materials.

LEHVOSS addresses the challenges of the circular economy with a range of policies and actions.

Material impacts, risks and opportunities

ESRS 2-SBM-3-48-(a); ESRS 2-SBM-3-48-(b); ESRS 2-SBM-3-48-(c)-i; ESRS 2-SBM-3-48-(c)-ii

The following table shows the material impacts, risks and opportunities of LEHVOSS in connection with the topic of circular economy that were identified as part of the double materiality analysis.

ESRS E5 Circular economy – Resource inflows, including resource utilisation

Description	Type	Value chain	Time horizon
Short-term uncertain raw material extraction and volatile purchase prices	Risk	Own operations	Short term

ESRS E5 Circular economy – Resource outflows associated with products and services

Description of	Type	Value chain	Time horizon
Actual negative impacts on resource outflows due to insufficient or uneconomical recyclability of plastic products	Negative impact	Own operations	

ESRS E5 Circular economy – waste

Description of waste	Type	Value chain	Time horizon
Actual negative impacts on the environment due to the generation of hazardous and non-hazardous waste in the production process production	Negative impact	Upstream	
Actual negative impact on the generation of waste due to insufficient recyclability of end products	Negative impact	Downstream	
Potential short-term positive impact on the generation of waste in the downstream use and further processing of LEHVOSS products	Positive impact	Downstream	Short term

Policies related to resource utilisation and circular economy

E5-1-14

We address our resource-related negative impacts resulting from insufficient or uneconomical recyclability of our plastic products in our Code of Conduct, which is explained in detail in the Corporate Governance chapter. The Code sets out our expectations for employees to always consider resource conservation in their work. Their responsibilities include ensuring that LEHVOSS's business activities have the least possible impact on the environment. This means saving materials where possible, planning projects to save energy, and considering opportunities to minimise and recycle waste. When selecting suppliers, advertising materials or other external services, every employee must take ecological and social criteria into account in addition to economic considerations.

In our statement of principles, we are also committed to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. Further information on the scope of our statement of principles can be found in the Social section.

Circular economy in the value chain

We also extend our commitment to protecting human health and the environment from the harmful effects of hazardous waste to our business relationships: In our Code of Conduct for Business Partners, we encourage them to take a proactive approach to environmental responsibility. We expect them to apply environmental protection practices, conserve natural resources, and minimise the environmental footprint of their production, goods, and services throughout their entire life cycle.

We also require our suppliers to take a systematic approach to identifying, handling, reducing and responsibly disposing of or recycling solid waste. They must also observe the bans on the export of hazardous waste in the current version of the Basel Convention. Chemicals or other materials that pose a risk when released into the environment must be identified by our business partners and handled in a manner that ensures safety during handling, transport, storage, use, recycling or reuse, and disposal.

We also require our business partners to promote closed-loop systems by supporting the use of sustainable, renewable natural resources while minimising waste and increasing the reuse and recycling of their products.

Further details on the Code of Conduct for LEHVOSS business partners can be found in the chapter on the value chain in the section on managing relationships with suppliers.

Management of impacts, risks and opportunities

Actions and resources related to resource use and circular economy

E5-2-19

An important step on our path towards a circular economy is to increase the proportion of recycled materials in our own products, thereby counteracting the depletion of raw materials and reducing waste volumes. Until now, the reliable availability of high-quality recycle has been a limiting factor for its use in our own production. Our current focus is therefore on identifying additional reliable suppliers of more sustainable alternatives that meet our technical requirements.

In addition to using alternative materials, we aim to fundamentally reduce our resource requirements and consumption. We are therefore working to increase the efficiency of our production processes. To this end, we are increasingly cooperating with our customers to create closed loops: for example, we take back residual materials from LEHVOSS-supplied compounds in order to reintroduce them into the production cycle.

We are also planning to optimise our formulations by the end of 2026. Through new developments and adjustments, we aim to reduce the use of required raw materials and increase their durability (i.e., the time until replacement is required due to wear). With these adapted formulations, we aim not only to reduce overall material use, but also, where possible, to substitute particularly critical raw materials and extend the service life of our products. Adjustments already successfully implemented include the replacement of polytetrafluoroethylene (PTFE) in tribologically treated compounds and the integration of halogen-free flame retardants in masterbatches.

Ambitions in terms of resource use and the circular economy

E5-3-24-(b);E5-3-24-(d);E5-3-24-(e)

To fulfil our ambitions regarding the responsible use of resources, we intend to reduce the proportion of fossil, non-renewable raw materials. Accordingly, LEHVOSS has set itself the goal of steadily increasing the proportion of raw materials from renewable sources. Reducing our waste volumes is also a key ambition.

Metrics

Resource inflows

Resource inflows in kilograms (kg) E5-4-31-(a); E5-4-31-(b);

E5-4-31-(c)

Description	Unit	Value
Total weight of products and technical and biological materials used	kg	16,850,400.00
Percentage share of biological materials	%	n/a
Total weight of recycled materials used for product manufacturing	kg	6,749,000.00
Percentage share of reused or recycled secondary materials in products	%	40%

Resource outflows

Resource outflows in kilograms (kg)

E5-5-37-(a); E5-5-37-(b); E5-5-37-(c); E5-5-37-(d); E5-5-39

Description	Value (kg)
Total amount of waste generated	2,026,848
Total amount of waste diverted from disposal	436,665
of which hazardous waste	10,900
of which non-hazardous waste	425,765
of which prepared for recycling	0
of which recycling	436,665
of which other recovery processes	0
Total amount of waste forwarded for incineration	1,486,752
of which hazardous waste	638,280
of which non-hazardous waste	848,472
Total amount of waste diverted to landfill	103,431
of which hazardous waste	0
of which non-hazardous waste	103,431
Total amount of waste from other types of disposal	0
of which hazardous waste	0
of which non-hazardous waste	0
Total amount of non-recycled waste	1,590,183
Proportion of non-recycled waste (%)	78%
Total amount of hazardous waste	649,180
Total amount of radioactive waste	0

Social

Our Policy Statement

S3-1-17; S1-1-20-(a); S1-1-20-(b); S1-1-20-(c); S1-1-21; S1-1-22

LEHVOSS regards the protection of human rights and the environment as a central element of corporate responsibility. In our Declaration of Principles on Human Rights and the Environment, we reaffirm our commitment to these values throughout our value chain. The statement describes our commitment to compliance with international standards and the implementation of due diligence processes to identify and minimise risks. The statement is available on the LEHVOSS website and can also be provided to customers upon request. Our approach to identifying human rights and environmental risks along our value chain is described in the section Risk analysis and evaluation in the Value Chain chapter.

We do not tolerate any form of discrimination or violation of human and labour rights and base our commitment to respecting human rights on the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We are committed to respecting internationally recognised human rights and upholding them in our business activities and along our value chain. This includes in particular:

- Prohibition of child labor and forced labor,
- Prohibition of all forms of slavery and discrimination,
- Strengthening of freedom of association,
- Compliance with occupational health and safety,
- Payment of adequate and fair wages and salaries,
- Prohibition of forced eviction and the use of security forces where such use may lead to human rights violations.
- Respect for human rights remains at the heart of our corporate policy and culture. More information on this can be found in the section Policies in connection with corporate policy and corporate culture.

As a signatory and member of the UN Global Compact, we are committed to supporting its Ten Principles in the areas of human rights, labour standards, environment and anti-corruption and to integrating them into our corporate strategy, culture, and day-to-day business. We therefore base our actions on

- the UN Guiding Principles on Business and Human Rights,
- the OECD Guidelines for Multinational Enterprises
- the Sustainable Development Goals (SDGs) under the 2030 Agenda.

In accordance with the UN Global Compact, we are also committed to following the precautionary principle in environmental matters and promoting environmental awareness and sustainable innovation. We also participate in cooperation projects that promote the general goals of the UN, in particular the SDGs. The principles of the UN Global Compact apply to all companies and therefore to all LEHVOSS employees.

Furthermore, LEHVOSS is committed to compliance with occupational health and safety, the payment of fair and adequate wages and salaries as well as the prohibition of environmental pollution, forced eviction and the use of security forces if their use involves the risk of disregarding or restricting human rights. We are also committed to the Minamata Convention on Mercury, the Stockholm Convention on POPs (persistent organic pollutants) and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

The scope of the Declaration of Principles covers the business activities of the entire LEHVOSS Group. In addition, we expect our suppliers and other business partners to commit to upholding the principles set out in the Declaration of Principles and to implementing appropriate processes to respect human rights and protect the environment.

The entire Executive Board is responsible for compliance with the human rights obligations set out in the Declaration of Principles. All subsidiaries are required to ensure that the Declaration of Principles is incorporated into local policies and guidelines. They also establish adequate controls to ensure compliance, identify risks, and develop process and improvement proposals.

Own Workforce

As a family business, we bear a great responsibility for our employees, who are crucial to the success of our company. Ensuring safe, favourable, and future-oriented working conditions with fair wages and a wide range of opportunities for further development is therefore a top priority for us. We also strive to promote a trusting working environment in which every employee feels seen and respected. We continue to face challenges during implementation. To address these, we have conducted a double materiality analysis to identify our main impacts, risks, and opportunities regarding working conditions, equal treatment, equal opportunities, and other labour-related rights.

Material impacts, risks and opportunities

ESRS 2-SBM-3-48-(a); ESRS 2-SBM-3-48-(b); ESRS 2-SBM-3-48-(c)-i; ESRS 2-SBM-3-48-(c)-ii; S1-ESRS 2 SBM-3-14; S1-ESRS 2 SBM-3-14-(a); S1-ESRS 2 SBM-3-14-(b); S1-ESRS 2 SBM-3-14-(c); S1-ESRS 2 SBM-3-14-(d); S1-ESRS 2 SBM-3-15; S1-ESRS 2 SBM-3-16

The following table shows the material impacts, risks and opportunities of LEHVOSS in connection with the topic of Own Workforce that were identified as part of the double materiality analysis.

ESRS S1 Own workforce – Working conditions

Description	Type	Value chain	Time horizon
Potential short-term negative impacts on the health of LEHVOSS employees due to occupational accidents and the risk of occupational diseases related to chemical production	Negative impact	Own operations	Short term
Actual positive impact on the skills and development of the LEHVOSS workforce in Germany through access to education, and training programmes	Positive impact	Own operations	
Higher personnel costs in the short term due to collective labour agreements	Risk	Own operations	Short term

ESRS S1 Own workforce – Equal treatment and equal opportunities for all

Description of	Type	Value chain	Time horizon
Potential short-term negative impact on gender equality and equal opportunities for women and others affected by systemic discrimination in the LEHVOSS workforce due to insufficient diversity management and lack of targeted recruitment and promotion policies for these groups, as well as failure to address the gender pay gap	Negative impact	Own operations	Short term
Actual negative impact on equal treatment and equal opportunities for employees with disabilities due to lack of employment at the LEHVOSS Group	Negative impact	Own operations	

The LEHVOSS workforce consists predominantly of permanent employees; in exceptional cases, employees on fixed-term contracts are also employed. Temporary workers are rarely engaged. The material impacts identified in our double materiality analysis affect all individuals within this group, although in some cases the impacts are limited to specific subgroups. For example, certain occupational accidents and illnesses can only occur at our production sites in Germany, China and the USA, and therefore only affect employees working in production at those locations. These potential negative impacts are associated with individual incidents and

cannot be entirely avoided in production environments. Our actual negative impacts in the area of equality and equal opportunities are systemic and affect all sites, but not the entire workforce. In particular, these relate to women, people with disabilities, and other groups affected by systemic discrimination due to the physical nature of production work.

We provide our employees with extensive access to training and further education programmes, which has a positive impact on our workforce. Temporary workers are generally excluded from these programmes due to the typically short duration of their assignments, but they do receive the necessary mandatory training and instruction.

The risk of higher personnel costs due to collective labour agreements currently applies only to LuV KG in Germany, where such agreements are in place for the workforce, which mainly comprises commercial and industrial employees.

Policies relating to the company's own workforce

S1-1-23

In order to address our impacts and risks relating to our employees, we have various policies in place, including our policy statement described above.

In addition, we have maintained a Code of Conduct for several years, which applies to all LEHVOSS employees. At the same time, we comply with local laws and labour regulations. Further information on our Code of Conduct can be found in the section on policies relating to corporate policy and corporate culture in the Governance chapter.

We have also established a global whistleblower channel to report and address any violations of human and labour rights (see the section on procedures for involving our own employees and employee representatives). In addition to the whistleblower channel, we also monitor compliance with human and labour rights at LuV KG through internal bodies such as the works council and the representative body for employees with severe disabilities. Employees may contact the works council or the representative body for employees with severe disabilities if, for example, they suspect unlawful working conditions or discrimination. This option is now also available to employees in France, where a works council was established in November 2024.

LuV KG operates an occupational health and safety management system at its German sites, which is subject to external audit approximately every three years. The management system takes into account both the safety of employees in the workplace and the protection of their health, as well as the safety and health of external parties entering the sites. It also covers safety requirements for the planning, construction and operation of technical facilities.

LEHVOSS also has a Group-wide environmental and safety guideline (Corporate Guideline Safety and Environment). This guideline sets out the responsibilities and working relationships between LuV KG and the LEHVOSS subsidiaries on the topics of product safety, occupational safety and environmental protection. Each subsidiary prepares an annual report, which is incorporated into the annual report of the Safety and Environmental Protection department and submitted to the Executive Board of LuV KG by the end of March of the following year. The reports include:

- operational incidents, accidents at work and preventive actions taken;
- internal and external training courses on safety and environmental matters; and
- safety and environmental audits and the actions derived from them.

Each LEHVOSS subsidiary has its own guidelines on occupational health and safety and environmental protection, based on the relevant national regulations. At the production site in China, the occupational health and safety management system is certified to the international standard ISO 45001.

Management of impacts, risks and opportunities

Processes for engaging with own workforce and workers' representatives about impacts

S1-2-27; S1-2-27-(a); S1-2-27-(b); S1-2-27-(c); S1-2-27-(d); S1-2-27-(e)

LEHVOSS has a decentralised structure: each subsidiary operates as an independent unit and actively involves its workforce in operational decision-making. In all LEHVOSS companies, the respective executive management is closely involved in day-to-day operations and maintains an ongoing dialogue with the workforce. They communicate key Group decisions directly to their respective workforces. To promote information-sharing and workforce integration, annual appraisals and regular staff meetings are held. Subsidiaries can seek advice on inclusion structures and tools from the HR department at LuV KG.

At LuV KG and LEHVOSS France, a works council also represents the rights and interests of the workforce. In close cooperation with the employer, it is committed to ensuring attractive and fair working conditions and is actively involved in processes such as recruitment and operational integration.

At LuV KG, the works council is involved in accordance with the German Works Constitution Act (BetrVG), which defines clear rights and obligations. These rights and obligations must be consistently upheld to ensure fair and transparent co-determination. The Works Council maintains regular dialogue with the Executive Board and holds monthly meetings to discuss current employee issues. Weekly meetings are also held, with participation from HR and specialist departments as needed. This is intended to strengthen employee involvement in relevant decision-making processes.

The Works Council systematically documents employee concerns and addresses them in meetings or formal hearings as required. To enable effective representation, at least one full-time member is released from their regular duties to serve on the Works Council, as required by the BetrVG. Currently, this release is shared among several members, allowing the committee to remain connected to various operational topics, benefit from diverse perspectives and expertise, and work more flexibly and efficiently. Works council members receive specialised training and legal advice to support them in their duties. Dedicated financial resources ensure the operational capacity of the committee and promote effective co-determination.

Procedures to address negative impacts and channels through which employees can raise concerns

S1-3-32-(a); S1-3-32-(b); S1-3-32-(c); S1-3-32-(d); S1-3-32-(e); S1-3-33

The aim of our responsible HR management is to mitigate any significant negative impacts on the workforce and foster a corporate culture based on openness, mutual trust and active participation.

We take a range of actions to achieve this, such as minimising stress through risk assessments. Further details can be found in the section on actions relating to our own workforce in this chapter. LEHVOSS also pursues an integrated approach, which includes both internal and external grievance mechanisms, comprising a global whistleblower system (the whistleblower channel) and the local expertise of the works councils at LuV KG and LEHVOSS France.

The whistleblower channel is the backbone of our internal reporting system. It is used to report criminal offences, compliance violations and other breaches of the LEHVOSS Code of Conduct. To foster a culture of trust, we encourage all employees to report concerns and misconduct in the workplace, anonymously if they wish. Reports can be made in any language. Employees may also contact managers, the Works Council, HR, Internal Audit or the Legal & Sustainability department directly. The whistleblower channel is actively promoted and is accessible via the LEHVOSS website and the intranet. A dedicated whistleblower policy ensures that all employees are informed about their rights and the available reporting channels at all times. The whistleblower channel is explained in detail during onboarding and reinforced through regular mandatory training sessions. This ensures that the entire workforce is aware of the relevant structures and processes. In addition to employees, business partners such as service providers, suppliers and other external parties may also raise concerns anonymously and in writing.

To ensure confidentiality, only five designated functions have access to incoming reports. Every report is carefully reviewed. In the event of serious breaches, an investigation is initiated immediately – for example by Internal Audit or local legal advisors – to effectively prevent unlawful behaviour.

Whistleblowers must not suffer any disadvantage. If a whistleblower suspects discrimination, they should contact the responsible manager immediately. If this does not lead to a satisfactory solution, a formal complaint can be submitted. The process also includes disciplinary action against anyone who retaliates or deliberately makes false accusations for personal gain.

The Works Council and HR department represent employees' concerns on site and work proactively to resolve grievances. To further strengthen internal transparency, the Works Council and the representative body for employees with disabilities actively communicate their roles within the workforce – for example, to new employees during quarterly onboarding events, via information boards at sites, at quarterly works meetings and on the intranet as required. This ensures that all employees are familiar with the complaints and reporting channels.

Actions in relation to own workforce

S1-4-37; S1-4-38-(a); S1-4-38-(b); S1-4-38-(c); S1-4-38-(d); S1-4-39; S1-4-40-(a); S1-4-41; S1-4-43

Working Conditions and Occupational Health & Safety

To prevent workplace accidents and occupational illnesses, the German and international companies provide annual mandatory training on occupational health and safety, as well as workplace-specific instructions and, where necessary, hazardous substance training. Regular risk assessments of work areas are conducted and preventative measures are implemented, for example in the areas of ergonomics or health services. At LuV KG, the Safety and Environmental Protection service group conducts internal audits according to an annual audit plan to review aspects of occupational safety; individual departments are selected at random.

Regular occupational health and safety compliance checks are conducted by external experts, covering both systemic and operational aspects of occupational health and safety management (most recently in February 2025). The Safety and Environmental Protection service group also supports and advises LEHVOSS subsidiaries on matters relating to occupational and product safety, as set out in the Corporate Guideline Safety & Environment.

LEHVOSS plans to expand existing reporting structures by the end of 2025, so that internal reporting on relevant safety topics and metrics is extended globally and the safety concept is further developed in the long term. In particular, this includes defining, introducing and continuously collecting TRIR (Total Recordable Injury Rate) and LTIFR (Lost Time Injury Frequency Rate) by the end of 2025 as key metrics for evaluating occupational health and safety management.

To review the effectiveness of our health and safety actions, the occupational safety committees at LuV KG and WMK Plastics analyse accidents at the German production sites and, where necessary, initiate appropriate actions. Quarterly meetings are held, and safety tours of the sites are also conducted at least once a quarter. These are attended by site management, production management, the occupational safety specialist, the fire safety officer and others as appropriate. If a reportable workplace accident occurs despite all precautions, an accident analysis is carried out on a case-by-case basis, documented, and appropriate actions are taken. This also includes updating the risk assessment.

Equality and equal opportunities

To promote equality and equal opportunities within the LEHVOSS workforce, we are taking action to strengthen our diversity management, improve recruitment and promotion policies for the relevant groups, and address the gender pay gap. By the end of 2025, we plan to develop a Group-wide HR guideline with policy standards that address equal treatment, among other aspects. Further information can be found in the section Ambitions in relation to our own workforce in this chapter. We also intend to expand our whistleblower channel during this period and communicate more prominently that discrimination and human rights violations can be reported through this channel. As part of this, we will provide training to HR managers by 2027 on setting salaries more effectively based on tasks and qualifications.

At LEHVOSS, we also focus on equal treatment and opportunities for employees with disabilities. To this end, we engage in dialogue with the representative body for employees with severe disabilities to discuss the extent to which such individuals are eligible for vacant positions on a case-by-case basis. The HR service department must inform the representative immediately if a person with a severe disability applies for a vacant position. Where candidates have equal qualifications, preference is given to people with severe disabilities.

Training and Skills Development

We place great importance on continuously promoting the skills and development of our workforce. Within the LEHVOSS Group, employees have access to a range of training and development programmes. In addition to mandatory training on our ethical principles and other compliance-related topics (see the section on corporate governance), we also offer training on intercultural skills, public speaking and resilience. Employees can also participate in training to improve their technical skills, such as digital skills. There are also special programmes for managers and various department-specific training sessions, arranged individually. Onboarding events are designed to support familiarisation and employee engagement with the company. We are currently expanding the training programme at LuV KG and its subsidiaries to include topics such as occupational health and safety, working methods and sustainability, in addition to specialist training.

We also intend to introduce annual documented employee appraisals in all companies, during which career paths and individual development are discussed. This will be accompanied by appropriate training for managers by the end of 2026 to enable them to conduct these appraisals competently.

Remuneration and Collective Bargaining

We aim to offer our employees fair and appropriate pay. Collective agreements (not of a statutory nature) currently apply only to employees of LuV KG. This covers 47.13 per cent of all LEHVOSS employees. These collective labour agreements entail a short-term risk of higher personnel costs. For this reason, LuV KG conducts annual personnel cost and budget planning, which takes regular pay increases into account. If no specific percentage figures are available for existing contracts, assumptions are made based on estimates and comparative company data. Where possible, we also apply the provisions of the collective agreement to non-tariff and executive employees.

Roles and responsibilities

We provide both financial and human resources for the management of our material impacts relating to our workforce. A responsible person from the relevant department is assigned to each sustainability topic, ensuring effective internal management.

The Executive Board and the Advisory Board are also involved in strategic decisions. The resources allocated by LuV KG to health and safety management include, for example, health budgets for medical examinations, courses and preventive programmes.

We aim to ensure that our own practices do not have or contribute to any significant negative impacts on our employees. The policies described in the section on policies relating to corporate policy and corporate culture, as well as those in our policy statement (such as the Code of Conduct), therefore apply. In addition, the mandatory principles of the UN Global Compact and our selection guidelines and partnership-based behaviour regulations apply. To prevent negative impacts on our employees, LuV KG always reviews whether jobs will be affected by implemented actions, for example whether positions will be cut or newly created.

Before any dismissals are announced, the company first examines whether a transfer or retraining of the affected employee is possible, as part of a social selection process and in cooperation with the works council.

LuV KG complies with the provisions of the German Works Constitution Act (BetrVG) and also proactively discusses possible changes with the works council.

Ambitions in relation to the company's own workforce

S1-5-46

Our ambition is to shape working and employment conditions at LEHVOSS in a future-oriented and responsible manner. In doing so, we go beyond legal compliance by placing the well-being of our employees at the centre, supporting them to perform at their best. We continuously strive to create safe and attractive working conditions for our workforce and take responsibility for employee health through regular analysis and targeted measures.

At a global level, we are aiming to develop a comprehensive HR guideline with key focus areas and recommendations for our subsidiaries. In the area of working conditions, safety and health protection, this guideline will provide guidance for internal safety and health concepts. With frameworks for equal opportunities and fair pay, we also want to enable employees and managers to prevent discrimination and foster diversity. The guideline should also include provisions to ensure fair remuneration. Finally, it will address training and skills development and provide new impetus for professional qualifications and knowledge development.

We have also set ourselves a clear deadline: by the end of 2027, we aim to introduce a strategy to combat discrimination and unequal treatment based on various dimensions of diversity, such as gender, age, origin and disability.

Metrics

Employee characteristics

S1-6-50-(d); S1-6-50-(d)-i; S1-6-50-(d)-ii

All employee indicators are reported by the subsidiaries to the LEHVOSS Group on a quarterly basis. The reporting date for the analysis is 31 December 2024. All employee data are reported on a headcount basis.

Total number of employees by headcount (HC)¹

S1-6-50-(a)

Category	Headcount
LEHVOSS Total	662
of which male	404
female	258
of which diverse	0
in Germany ¹	444
in China ¹	60
in Italy ¹	52

¹ In accordance with ESRS S1-6-50, all countries with more than 50 employees are shown.

Information on employees by contract type (headcount)

S1-6-50-(b)

Category	Female	male	diverse	Total
Total number of employees	258	404	0	662
Permanent full-time employees	251	384	0	635
Temporary full-time employees	7	20	0	27
Employees without guaranteed hours	0	2	0	2

Employee turnover rate

S1-6-50-(c)

Category	Value
Number of employees who have left the company	19
Employee turnover rate	3

Characteristics of the non-employee workforce

S1-7-55-(a); S1-7-55-(b); S1-7-55-(b)-i; S1-7-55-(b)-ii

The LEHVOSS Group rarely engages non-permanent employees (temporary workers and freelancers). This only occurs in exceptional cases, such as short-term staff shortages in production, and then only for auxiliary activities. No temporary or freelance staff were engaged during the reporting year.

The figures for external labour are collected quarterly on a headcount basis by LuV KG and its subsidiaries. The data refer to the reporting date of 31 December 2024.

Collective bargaining coverage and social dialogue

S1-8-60-(a); S1-8-60-(b); S1-8-60-(c); S1-8-63-(a); S1-8-63-(b)

47.13 per cent (312 employees) of all LEHVOSS employees are covered by a non-statutory collective labour agreement. In Germany, 70.27 per cent of employees are covered by a collective agreement. There is no European works council. No collective agreements apply outside the European Economic Area.

Diversity parameters

Employees at management level by gender

S1-9-66-(a)

In this context, the top management level includes all persons with personnel responsibility, both professional and disciplinary.

Category	Headcount	Proportion (%)
Total employees at management level	103	
of which female	27	26
of which male	76	74
of which diverse	0	0

Employees by age

S1-9-66-(b)

Category	Headcount	Proportion (%)
Total employees	662	
under 30 years	57	9
between 30 - 50 years	356	54
over 50 years	249	38

Social protection

S1-11-74-(a); S1-11-74-(b); S1-11-74-(c); S1-11-74-(d); S1-11-74-(e); S1-11-75

Group accident insurance is provided for all employees. Loss of earnings due to illness, accident, disability, parental leave, retirement or unemployment is either covered or mitigated by state programmes or supplementary local insurance policies. Currently, no detailed data are available for social protection. The missing information will be collected in the next reporting year.

People with disabilities

S1-12-77

Each subsidiary reports the number of particularly vulnerable individuals in its workforce—such as people with severe disabilities or minors—to the HR department of the parent company on a quarterly basis. However, this only includes those individuals of whom the respective HR managers are aware. For example, in Germany, there is no obligation for employees to inform the employer of any degree of severe disability.

S1-12-79

Proportion of people with disabilities in the total workforce: 3%

Training and skills development

S1-13-83-(a); S1-13-83-(b)

No data are available on performance and career assessments. Employee appraisals are conducted and documented annually or every two years both at LuV KG and at almost all other subsidiaries. All LEHVOSS employees completed an average of 4.72 hours of training in 2024.

Health protection and safety

Percentage of employees covered by a health and safety management system

S1-14-88-(a)

Employees	79.00%
Non-employees ¹	Not applicable
Workers from the supply chain who work at LEHVOSS sites ¹	Not applicable

¹ LEHVOSS had no non-employee workers and no people from the supply chain working at LEHVOSS sites in the reporting year.

Number of fatalities due to work-related injuries¹

S1-14-88-(b)

Employees	0
Non-employees	0
Workers from the supply chain who work at LEHVOSS sites	0

¹ The data for the reporting year is only available for LuV KG and WMK Plastics.**Number of reportable occupational accidents**

S1-14-88-(c)

Employees¹	22	21%
Non-employees	0	- %
Workers from the supply chain who work at LEHVOSS locations	0	- %

¹ Rate of occupational accidents per million hours worked. Based on average working hours per year and employee of 1,585 hours and 662 employees.**Number of notifiable work-related illnesses**

S1-14-88-(d)

Employees	0
Non-employees	0
Workers from the supply chain who work at LEHVOSS sites	0

Number of days lost due to work-related injuries and fatalities resulting from occupational accidents, work-related illnesses or fatalities resulting from work-related illnesses

S1-14-88-(e)

Employees	152
Non-employees	0
Workers from the supply chain who work at LEHVOSS sites	0

Compensation metrics (pay gap and total compensation)

S1-16-97-(a); S1-16-97-(b); S1-16-97-(c)

There is no data available on compensation metrics.**Incidents, complaints and severe impacts related to human rights**

S1-17-103-(a); S1-17-103-(b); S1-17-103-(c); S1-17-103-(d)

No incidents or complaints relating to human rights, discrimination or harassment were reported to the LEHVOSS Group in the reporting year. **There is no information on significant fines, sanctions or compensation payments.**

Value chain

We source raw materials from all over the world in order to offer our customers from various industries and sectors a broad portfolio of chemical and mineral specialities. To this end, we work with numerous partners in our value chain.

In this context, LEHVOSS has both potential and actual negative impacts on the labour-related rights of workers in its value chain and on the economic, social and cultural rights of the communities affected by its business activities.

Material impacts, risks and opportunities

ESRS 2-SBM-3-48-(a); ESRS 2-SBM-3-48-(b); ESRS 2-SBM-3-48-(c)-i; ESRS 2-SBM-3-48-(c)-ii; S1-ESRS 2 SBM-3-14; S1-ESRS 2 SBM-3-14-(a); S1-ESRS 2 SBM-3-14-(b); S1-ESRS 2 SBM-3-14-(c); S1-ESRS 2 SBM-3-14-(d); S1-ESRS 2 SBM-3-15; S1-ESRS 2 SBM-3-16

The following table shows the material impacts, risks and opportunities of LEHVOSS in relation to the topic of value chain that were identified as part of the double materiality analysis.

ESRS S2 Labour in the value chain - Other labour-related rights

Description of rights	Type	Value chain	Time horizon
Potential short-term negative impacts on labour rights due to child labour, forced labour and slavery in supplier countries of the LEHVOSS Group	Negative impact	Upstream	Short term
Potential short-term negative impacts on the rights of workers in the upstream value chain due to child and forced labour in mining, surface mining and agriculture	Negative impact	Upstream	Short term
Actual negative impacts on the rights of children in the upstream value chain due to the prevalence of child labour in artisanal small-scale mining	Negative impact	Upstream	
Potential short-term negative impact on the rights of ethnically or religiously discriminated workers in the upstream and downstream value chain due to the risk of forced labour in China	Negative impact	Upstream and downstream	Short term

ESRS S3 Affected communities - Economic, social and cultural rights of communities

Type communities Description		Value chain	Time horizon
Actual negative impacts on the wellbeing, health, care and rights of local communities through appropriation, use and destruction of land, resources and important livelihoods in connection with the extraction of raw materials in the supply chain	Negative impact	Upstream	

Policies related to the value chain

S2-1-16; S2-1-17-(a); S2-1-17-(b); S2-1-17-(c); S2-1-18; S2-1-19; S3-1-14

The Code of Conduct for Business Partners and our Declaration of Principles on Human Rights and the Environment (details of the Declaration of Principles on Human Rights and the Environment, can be found in the section Our Policy Statement) are key policies for addressing material impacts on people in our value chain associated with our business activities. They set out how LEHVOSS assumes responsibility and the requirements we place on our partners.

The Code of Conduct for Business Partners defines the LEHVOSS Group's expectations regarding social and environmental responsibility. In addition to respect for human rights, the ban on child and forced labour and the prohibition of discrimination, it regulates minimum requirements for working conditions and safety on site, e.g. the provision of necessary protective clothing. The remuneration of the labour force must cover basic needs, enable an appropriate standard of living for employees and their families and take into account local minimum wage and social protection regulations. Our business partners must respect workers' rights to unionise, bargain collectively and represent employees, and allow them to communicate openly about their working lives without fear of negative consequences. Further details on the Code of Conduct for Business Partners can be found in the section on managing relationships with suppliers.

Management of impacts, risks and opportunities

Processes to remediate negative impacts and channels for value chain workers to raise concerns

S2-3-27-(a); S2-3-27-(b); S2-3-27-(c); S2-3-27-(d); S2-4-36

LEHVOSS has set up a whistleblower channel to identify potential grievances and human rights violations at an early stage. The channel and its mechanisms apply equally to external stakeholders in the value chain and to our own workforce. Details on this can be found in the section on procedures for remedying negative impacts and channels through which our own employees can raise concerns in the Own Workforce chapter.

Through our Code of Conduct for Business Partners, we also require partners in our value chain to establish an appropriate grievance mechanism in accordance with the UN Guiding Principles on Business and Human Rights (Principle 31). The mechanism must allow concerns to be raised anonymously, confidentially and without fear of retaliation. Further information on the Code of Conduct for Business Partners can be found in the Supplier Relationship Management section of the Governance chapter.

In cases where we cause or contribute to actual human rights or environmental violations through our business activities, we are committed to implementing effective remedial actions. In the current reporting year, no incidents of violations of the aforementioned international standards were reported or became known.

Actions in relation to the value chain

S2-4-32-(a); S2-4-32-(b); S2-4-33-(a); S2-4-33-(b); S2-4-35; S2-4-38; S2-4-AR 31; S3-4-32-(a); S3-4-32-(b); S3-4-33-(a); S3-4-33-(b); S3-4-33-(c); S3-4-35; S3-4-38; S3-4-AR 37

As a company in the chemical industry, LEHVOSS is aware that human rights and environmental impacts may arise from its business activities. At the same time, however, it also opens up opportunities to strengthen the protection of human rights in a variety of ways, e.g. through careful supply chain management.

Risk analysis and evaluation

In order to identify and evaluate human rights and environmental risks, LEHVOSS carried out a systematic risk analysis for the first time in early 2024.

We initially carried out a risk analysis for direct suppliers at the level of the sourcing countries; this covered five subsidiaries of the LEHVOSS Group. In a two-stage process, the abstract risk relating to human rights and environmental issues, as defined by the German Supply Chain Due Diligence Act, was determined.

LEHVOSS conducted this process using various publicly available quantitative indices, supplemented by extensive qualitative indicators. In the second step, the specific risk at the direct suppliers was determined based on the severity and likelihood of occurrence of a human rights violation or negative environmental impact. The degree of severity was assessed according to the seriousness of the human rights violation, the number of people affected, and the irreversibility of the impact. The likelihood of occurrence of a potential violation or negative environmental impact was determined taking into account the preventive measures already implemented.

We identified the following potential risks as part of the country risk analysis: LEHVOSS's supplier base from Europe has a low risk profile. Only minor actions are required here. There is an increased risk in the sourcing countries China, Brazil, India, Malaysia, Mexico, Saudi Arabia and Turkey. The most common risks in these sourcing countries include unequal treatment, disregard for labour protection, disregard for freedom of association and environmental impacts to the detriment of third parties.

In addition to the country risk analysis, LEHVOSS also carried out a hotspot analysis. This focused on raw materials and commercial products whose procurement and production are potentially associated with particularly high risks in terms of human rights violations and negative impacts on the environment. Based on an internal assessment by our specialist departments, we identified 17 raw materials and commercial products whose human rights and environmental risks were researched in depth in a text-based

analysis. Where information was missing at substance or product level, we analysed the industry as a whole. Mining, the oil and gas industry, agriculture and the chemical industry emerged as particularly high-risk sectors for upstream value creation and, in particular, the raw material extraction stage.

Conflict minerals do not currently make up a deliberately added or known proportion of the LEHVOSS Group's product portfolio. Our purchasing and sales processes are monitored by means of customs tariff numbers and ad hoc checks. To date, all customer enquiries regarding conflict minerals - in particular gold, tantalum, tungsten and tin as well as their ores - have been answered on a product-related basis. This has so far been done by checking the respective material composition of the products. In order to ensure greater transparency and traceability in our supply chain, we have already integrated a basic query on conflict minerals into our supplier self-disclosure.

Preventive actions

A range of measures is required to appropriately address the risks identified in the risk analysis and to implement our due diligence obligations in the supply chain accordingly. Based on the risk analysis described above, a purchasing workshop was held with the Supply Chain Management department in April 2024. The aim of the workshop was to determine the strategic direction of sustainable procurement within LEHVOSS. We identified various objectives as priorities (see section Ambitions in relation to corporate policy and corporate culture in the Corporate Governance chapter). In order to bring the relevance of sustainable procurement into the company and enable our employees to implement it accordingly, we plan to introduce mandatory training for employees with access to supplier management and order processing. This training is intended to provide knowledge of ESG criteria and risk identification in the extended supply chain

In addition to internal processes, LEHVOSS also participates in various initiatives to benefit from dialogue with other industry players on human rights and environmental issues in the value chain. We are a member of the German Chemical Industry Association and its Chemie³ sustainability initiative, the chemical industry's Responsible Care Initiative and a signatory to the UN Global Compact.

Ambitions in relation to the value chain

S2-5-41; S3-5-41; G1-2-15-(b)

LEHVOSS places great emphasis on minimising the negative impacts of its business activities on people and the environment in its value chain. We are therefore continuously developing our strategic orientation. We aim to eliminate the negative impacts identified in our analyses and prevent risks. We are currently establishing processes to integrate sustainability aspects into our procurement activities. We are also implementing due diligence processes in our supply chain and a comprehensive supplier management system (Supplier Relationship Management Tool). Our specific objectives in the context of supplier management are described in the section Ambitions in relation to corporate policy and corporate culture in the Governance chapter.

Governance

The LEHVOSS Group attaches great importance to a strong and positive corporate culture. As a family business, we are guided by ethical values and entrepreneurial ideals. We think and plan for the long term and, in our self-image as LEHVOSS, are always willing to adapt in order to remain successful. Our core principles are mutual respect and solid, legally compliant and socially responsible entrepreneurship. As a chemical company, we aim to increase our value without taking risks that could jeopardise our existence or by overlooking social, legal or environmental aspects. We are convinced that sustainability is therefore a core component of our company.

Material impacts, risks and opportunities

ESRS 2-SBM-3-48-(a); ESRS 2-SBM-3-48-(b); ESRS 2-SBM-3-48-(c)-i; ESRS 2-SBM-3-48-(c)-ii; ESRS 2-SBM-3-48-(c)-iii; ESRS 2-SBM-3-48-(c)-iv

The following table shows the material impacts, risks and opportunities of LEHVOSS in connection with the topic of corporate governance that were identified as part of the double materiality analysis.

ESRS G1 Corporate policy - Corporate culture

Description of	Type	Value chain	Time horizon
Actual positive impact on the shared value formation of the LEHVOSS workforce through social commitment	Positive impact	Own operations	

ESRS G1 Corporate policy - Management of relationships with suppliers; including payment practices

Description of	Type	Value chain	Time horizon
Actual negative impacts on the management of relationships with suppliers due to a lack of strategy and actions for sustainable procurement, e.g. in the form of ESG criteria in supplier evaluation, Group-wide governance structures in purchasing or training of employees.	Negative impact	Own operations	
Medium-term economic consequences of inadequate supplier relationships	Risk	Own operations	Medium term
Medium-term Trade restrictions with China due to geopolitical tensions	Risk	Own operations	Medium term
Medium-term Increasing legal and social requirements for sustainable supplier management	Risk	Own operations	Medium term
Medium-term resilient supply chains through proactive supplier management	Opportunity	Own operations	Medium term

ESRS G1 Corporate policy - Corruption and bribery

Description of	Type	Value chain	Time horizon
Potential short-term negative impact on the prevention and detection of corruption and bribery through cooperation with suppliers from countries particularly affected by corruption	Negative impact	Upstream	Short term
Potential short-term negative impact on the prevention and detection of corruption and bribery through cooperation with business partners from the manufacturing industries and in the pharmaceutical sector	Negative impact	Upstream	Short term
Potential short-term negative impact on the prevention and detection of corruption and bribery in the downstream value chain with business partners in the waste disposal sector	Negative impact	Downstream	Short term
Medium-term avoidance of damage and increase in trust through corruption prevention	Opportunity	Own operations	Medium term

Policies in connection with business conduct policies and corporate culture

G1-1-9; G1-1-10-(a); G1-1-10-(e); G1-1-10-(g); G1-1-10-(h)

Based on our corporate values, we formulated a mission statement back in 2002. It defines the cornerstones of our corporate culture and guides us towards a successful future. The requirements of the mission statement are specified by clear guidelines and standards, as set out in the group-wide LEHVOSS Code of Conduct. The Code of Conduct sets out the behavioural expectations for all employees and obliges them to comply with all relevant laws and internal regulations. It applies equally to all employees of LEHVOSS subsidiaries.

We are committed to respecting internationally recognised human rights and upholding them in our business activities and along our value chain. Respecting and protecting human rights is of great importance to us, which is why we are committed to complying with legal requirements, acting in accordance with ethical principles and adhering to internationally recognised standards and agreements, such as the UN Global Compact and the International Labour Organization (ILO) Declaration, as set out in our Declaration of Principles on Human Rights and the Environment. We refer to this document in detail in the Own Workforce section under our Declaration of Principles.

This commitment is also set out in our Code of Conduct, which explicitly prohibits corruption and bribery as well as discrimination of any kind, and addresses other topics such as resource conservation, data protection, competition law compliance, money laundering, and the prevention and management of personal or professional conflicts of interest.

The LEHVOSS Legal & Sustainability department is responsible for communicating the content of the Code of Conduct within the company. All LEHVOSS employees receive the Code of Conduct to sign as part of their onboarding. The document is also publicly available on our company intranet and on the Internet. We inform our employees about changes to the Code of Conduct by circular mail and have them sign it again if necessary.

In addition to the Code of Conduct, our corporate culture is also characterised by our membership of the global Responsible Care Initiative of the German Chemical Industry Association (VCI). The initiative is committed to continuously improving health, environmental protection and safety for our employees and fellow citizens. The VCI guidelines have been an important component of our processes for years. In line with these, we are committed to responsible behaviour and raise our employees' awareness of the social and environmental impact of our company and our products. We also work continuously to optimise the safety of our products throughout their entire life cycle and provide transparent information about their correct handling, from transport through to disposal.

Identification and investigation of indications of breaches of regulations

Violations of legal regulations can result in considerable reputational damage and legal disadvantages for the employees concerned, their colleagues, managers and LEHVOSS – including fines, criminal proceedings or restrictions on official authorisations. In addition, violations can lead to disciplinary action under employment law by LEHVOSS. LEHVOSS has implemented various mechanisms to ensure compliance with legal and company regulations, to improve business processes and to identify and investigate unlawful behaviour or breaches of internal company guidelines. These mechanisms cover both internal and external stakeholders.

LEHVOSS actively encourages its employees to report possible violations of the Code of Conduct. Our whistleblower system, established in accordance with applicable regulations, provides a secure channel for both employees and external parties to report concerns. This channel is described in detail in the section on procedures for remedying negative impacts and channels through which employees can raise concerns. Employee concerns regarding the company's behaviour on sustainability issues were also highlighted as part of the risk management process and the materiality analysis.

Independent and objective internal audits are another mechanism at LEHVOSS for reviewing the legality of business processes and systematically identifying risks. The Internal Audit department is responsible for this and is authorised to inspect relevant documents and request the information required to fulfil its tasks.

It also has the authority to take immediate action to secure evidence and assets in the event of suspected fraudulent behaviour. Each year, Internal Audit, Quality Management and Export Control draw up audit plans and carry out the relevant audits. Reports document the controls and are discussed by the Executive Board. Any optimisation or remedial actions identified by Internal Audit are also decided upon there.

In addition, the LEHVOSS legal department supports all subsidiaries in complying with legal and ethical standards. It provides legal advice and helps them to identify and report legal violations.

Risk management

In addition to the whistleblower system and the processes for investigating reported information, LEHVOSS has introduced ongoing risk management since 2021. This includes the identification, assessment and management of risks, including risks associated with unlawful behaviour such as corruption. Information on responsibilities and overarching sustainability risks can be found in the Risk management and internal controls section of the Sustainability Statement.

All corporate functions that directly or indirectly make sales or purchasing decisions are subject to an increased risk of corruption and bribery. In our authorisation and signature guidelines as part of the internal control system (ICS), we have therefore established a dual control principle for purchase requisitions and invoice approval. Obligations such as contracts may only be entered into with double authorisation. Additional checks are designed to detect irregularities. We also work according to the principle of segregation of duties. For example, the processes for determining requirements and purchasing are separated. We also use data analysis tools to monitor transactions and recognise anomalies.

Our processes for risk management and for identifying and dealing with violations are designed to ensure that LEHVOSS effectively identifies, reports and investigates potentially unlawful behaviour. In this way, we aim to ensure compliance with regulations and ethical standards and thereby avoid the need for prosecution.

Management of impacts, risks and opportunities

Corporate culture

As a locally rooted family business with over 130 years of company history, we want to give something back to the people and the environment in Hamburg and the surrounding area. This is why we volunteer in the areas of social and health care, culture and nature.

One example is our support for the Sternenbrücke children's hospice. The centre helps children and young people with life-limiting illnesses and their relatives to find a dignified path until the end of life. We also provide financial support to the integrative Hinz & Kunzt project for homeless people, as well as the Hamburger Kunsthalle and the Deutsche Meeresstiftung. We also enable our employees to get actively involved locally and support organisations they know. In the past, for example, our employees in the UK have supported a local organisation that distributes Christmas food parcels to people in need in their community. At the same time, we want to continuously communicate our values and ambitions to our employees so that they can contribute to responsible corporate governance and make ethical, socially responsible and environmentally conscious decisions.

Management of relationships with suppliers

G1-2-15-(a)

To counteract our negative impacts in connection with our value chain, we are committed to respecting human rights, ensuring fair labour conditions and high environmental standards throughout the supply chain. It is therefore important to us to work with suppliers who share our standards and values in terms of quality, sustainability and ethical behaviour. Accordingly, we expect our suppliers to comply with our requirements, relevant environmental and social standards and legal obligations. We also ask them to pass on these requirements throughout their entire value chain.

The applicable requirements are set out in the LEHVOSS Code of Conduct for Business Partners. The aim of the code is to limit potential risks for the company in connection with the supply chain and negative effects on people and the environment by means of appropriate guidelines. The LEHVOSS Code of Conduct for Business Partners is based on fundamental principles of social and environmental responsibility as well as principles of corporate governance that comply with applicable laws and international standards. These international standards include the UN Universal Declaration of Human Rights, the ILO Conventions, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the Rio Statement on Environment and Development and the Paris Climate Agreement. The Code of Conduct explicitly prohibits corruption and bribery, among other things. It also obliges business partners such as suppliers to introduce management systems to monitor processes and actions, achieve set targets and strive for continuous improvement. It contains guidelines on ethical business conduct, human rights and working conditions, including occupational health and safety. The Code of Conduct for Business Partners also addresses environmental aspects such as water consumption, climate change mitigation and environmental pollution. We also encourage our business partners to develop and promote an inclusive corporate culture in which diversity is valued and in which everyone can make their full contribution and realise their full potential. Discrimination on the basis of diversity characteristics such as age, gender, origin, religion, sexual orientation or disability must not be tolerated by our business partners and should be actively addressed.

LEHVOSS informs its business partners about the Code of Conduct that applies to them through the General Terms and Conditions of Purchase and on its website. The reference to the Code of Conduct and the whistleblower channel is already included as a standard clause in our framework purchasing agreements and distribution and agency agreements. We also plan to attach the General Terms and Conditions of Purchase with the linked reference to the Code of Conduct for Business Partners and the whistleblower channel to every order in future.

The Code of Conduct for Business Partners was adopted by the Executive Board. With the support of the Legal & Sustainability department, the operating units are responsible for ensuring that it is implemented.

Compliance with legal regulations and the Code of Conduct for Business Partners is monitored through regular internal audits and self-assessment questionnaires for suppliers. Employees in procurement receive regular training on relevant topics.

As we value long-term and trusting partnerships, close cooperation and open communication with our suppliers is important to us. Through regular discussions and joint projects to improve our sustainability performance, we work with our business partners to achieve the international standards for business integrity and for social and environmental conditions in our supply chains. The joint projects aim, for example, to develop circular material for 3D printing or to produce silica in a more resource-efficient way.

In order to identify and assess potential risks in the supply chain, LEHVOSS carries out regular risk assessments as part of the aforementioned risk management programme. This includes both internal and external risks that could have an impact on business activities. We are currently working on taking greater account of environmental aspects in our analyses. Based on the results, LEHVOSS takes actions to minimise risks in order to reduce the probability and impact of the risks. This includes, among other things, the regular review of suppliers and the introduction of early warning mechanisms. In the business areas with a particularly high product risk, we have special management systems in place, such as the HACCP (Hazard Analysis and Critical Control Points) concept in the food sector and GMP (Good Manufacturing Practice) guidelines in the pharmaceutical sector. The introduction of these systems is based on product-specific risk analyses.

Prevention and detection of corruption and bribery

G1-3-18-(a); G1-3-18-(b); G1-3-20; G1-3-21-(a); G1-3-21-(b); G1-3-21-(c)

In an increasingly interconnected world, companies are required more than ever to ensure that their business practices are transparent and ethical. Corruption and bribery not only pose significant legal and financial risks, but would also undermine the trust of stakeholders and the public in the integrity of a company.

LEHVOSS does not tolerate any form of bribery or corruption, including the acceptance or granting of undue advantages. We have committed ourselves to this by participating in the UN Global Compact, our Code of Conduct and the Code of Conduct for Business Partners. Further details can be found in the sections on policies relating to corporate policy and corporate culture, and on managing relationships with suppliers. With this strict rejection of corrupt behaviour, we want to systematically prevent short-term negative effects that could compromise the detection of corruption and bribery. This primarily affects our supplier relationships in countries with a substantial risk of corruption and with suppliers from the manufacturing industry, the pharmaceutical sector and the waste disposal industry. This approach helps to minimise damage in the medium term, strengthens trust in our corporate actions and therefore represents a financial opportunity.

Our internal control system (ICS) plays a key role in the prevention and detection of corruption and bribery. Among other things, it stipulates that regular compliance and anti-corruption training is carried out to ensure that our guidelines are adhered to. The guidelines on avoiding corruption and bribery are publicly available on the company intranet. Further information on the ICS can be found in the Risk management and internal controls section of the Sustainability Statement.

The regular training courses are designed as eLearning sessions and take place as part of the onboarding of new employees and at least every two to three years. The content varies depending on the area of responsibility and exposure to compliance risks and is constantly kept up to date. All permanent LEHVOSS employees receive training on topics such as compliance, including anti-corruption, the Code of Conduct, data protection and IT security. Managers and functions at risk in sales and procurement in the business and service units and subsidiaries also receive in-depth anti-corruption, export control and antitrust law training. In the reporting year, 100 per cent of all high-risk functions were trained accordingly. 55 per cent of employees received ethics training. Participation is monitored by the Legal & Sustainability department, with responsible managers receiving quarterly evaluations. In addition, all employees are regularly reminded of their obligation to participate by email.

In addition to the employee training described above and the implementation of guidelines, LEHVOSS has various internal precautionary measures in place to prevent the occurrence of corruption or bribery. Details can be found in the Risk Management section. These measures are supported by the whistleblower system. It enables the reporting of relevant offences and is described in more detail in the section on procedures for remedying negative effects and channels through which employees can raise concerns. If a violation is suspected, LEHVOSS will initiate an immediate investigation. Disciplinary action may be taken against any employees involved.

High-risk functions	Covered by training programmes
Procurement	100%
Sales and marketing	100%
Supply chain management	100%
Finance and Controlling	100%
Human Resources	100%

Incidents of corruption and bribery

G1-4-24-(a); G1-4-24-(b)

During the reporting period, no incidents of corruption or bribery were reported, either directly or via the whistleblower system. Accordingly, there was no reason to initiate corrective actions, nor were any fines imposed.

However, a data protection incident was reported in Italy and was swiftly resolved after being reported to the supervisory authority.

Ambitions with regard to corporate policy and culture

G1-2-15-(b)

At LEHVOSS, we want to continue to develop, address the impacts we cause or are associated with, and embed sustainability deeply in our company. For this reason, we have developed specific objectives and various actions in the area of corporate governance across our key topics.

Corporate culture

We have set ourselves the following targets to enable our employees to make socially and environmentally sustainable decisions and to further promote social engagement:

- From July 2025, a regular newsletter on the intranet will report on various ESG topics and projects.
- By the end of 2026, 100% of our employees are to receive basic training on sustainability at LEHVOSS.

Management of relationships with suppliers

We are pursuing specific ambitions to address our impacts, risks and opportunities as part of our supplier management:

- By the end of 2025, we aim to develop and introduce a Group-wide guideline on sustainable procurement and a corresponding governance structure, in order to take defined sustainability criteria into account as early as the procurement stage. The guideline will define system-based minimum standards for supplier evaluation and development and should enable a global view of supplier evaluations. Implementation is scheduled for completion for the European companies by mid-2026.
- We aim to establish a risk-based due diligence process by mid-2026.
- Based on the established due diligence process, we also want to introduce a standardised assessment for suppliers by the end of 2026. This should cover 80% of our global purchasing value volume. In this context, we also want to establish a standardised process by the end of 2026 to take concrete actions as soon as risks are identified.
- By the end of the first quarter of 2027, we aim to have implemented actions to address the first deviations from our requirements identified in the due diligence process. We then plan to require these suppliers to demonstrate their commitment to ethical principles, or at a minimum, to the Ten Principles of the UN Global Compact.

Prevention and detection of corruption and bribery

Our top priority is not to allow or facilitate any cases of corruption involving LEHVOSS employees. In order to further minimise corruption risks, we want to introduce step-by-step due diligence checks:

- By the end of 2030 for strategic suppliers in high-risk regions and/or with an increased risk profile.
- By the end of 2027 for critical disposal channels.

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