

# Modern Slavery Statement 2024/2025



This thyssenkrupp Modern Slavery Statement covers the fiscal year 2024/2025 (ended September 30, 2025). The statement complies with the requirements of the UK Modern Slavery Act (2015), the Australia Modern Slavery Act (2018), Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (2024) and California Transparency in Supply Chains Act (2012). It describes the activities thyssenkrupp Group (thyssenkrupp AG and its affiliated subsidiaries)<sup>1)</sup> have undertaken throughout the financial year to strengthen our processes and better understand the risks of modern slavery and human trafficking in our global operations and supply chains. When we use the term human rights, modern slavery as well as human trafficking are included unless pointed out otherwise. Content specific to the operations and supply chains of the reporting entities under the Australia Modern Slavery Act and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act is reported to the Australian and Canadian Government in separate reports. All general group wide policies and management approaches also cover our Australian, Canadian and UK entities.

<sup>1)</sup> thyssenkrupp AG and its subsidiaries are referred to as a "group". The group comprises the entities included in the legal scope of consolidation. Subsidiaries are companies controlled indirectly or directly by thyssenkrupp AG which are included in the consolidated financial statements.

## Fundamental information about the group

The thyssenkrupp Group is led strategically by thyssenkrupp AG. Founded in 1999 as a stock corporation under German law, the company has registered offices in Essen and Duisburg. Corporate headquarters is located in the ruhr tech kampus in Essen. The Executive Board of thyssenkrupp AG sets the strategy for the Group's development and steers the businesses, the corporate functions, and the service units. The segments are generally divided into business units and operating units. As of September 30, 2025, 320 companies and 15 investments accounted for by the equity method are included in the consolidated financial statements; overall we consolidate companies from 48 countries. In the past fiscal year, our business activities were organized in five segments:

- **Material Services:** Global materials distributor, customer-specific processing, warehousing and logistics services, data-driven solutions for more sustainable, digital supply chains
- **Decarbon Technologies:** Manufacture of slewing rings, antifriction bearings and seamless rolled rings for wind energy and various industrial applications, plant construction and services, including for the chemical and cement industries and provider of technologies for electrolysis plants, in particular for the production of green hydrogen on an industrial scale
- **Automotive Technology:** Volume supplier of chassis and powertrain components, assembly and logistics partner, supplier of body assembly lines and volume producer of lightweight body parts
- **Steel Europe:** Production of flat carbon steel for the automotive industry and many other sectors, establishing climate-neutral steel production as part of the tkH2Steel transformation project, further implementation of Strategy 20-30 with a focus on premium products with higher stability, optimized surfaces and thinner, higher-performance sheets for electromobility
- **Marine Systems:** System provider in submarine and surface vessel construction and in maritime electronics and security technology.

thyssenkrupp AG is responsible for the strategic management of the group. In addition to governance tasks, the allocation of investment funds and management development, it concentrates especially on performance and portfolio management. Alongside the cross-cutting functions of strategy, human resources and finance that are within the remit of the Executive Board, responsibility for the segments is allocated to the individual Executive Board members. Especially in respect of operational management decisions, the individual segments act autonomously under the strong thyssenkrupp umbrella brand.<sup>2)</sup> The members of the Executive Board of thyssenkrupp AG are responsible for ensuring that the management teams achieve the performance targets.

For more information, please see the thyssenkrupp [Annual Report 2024/2025](#).

### Supply chain

In our corporate group, our procurement teams are committed to being a reliable partner for general management and for all parties along the value chain, contributing significant and measurable value to the competitiveness of thyssenkrupp's product and service portfolio and to mitigate risks in the supply chain. As we are committed to highest standards regarding sustainability and compliance, we place utmost importance on responsible procurement practices.

We believe that these are key success factors going forward: Our procurement teams working closely together with their internal partners across multiple functions; applying state-of-the-art procurement methods and tools; and continuing on the journey towards digital procurement processes. All this is driven by the individual companies within thyssenkrupp, in line with their specific business and market requirements. The Procurement & Supply Management service lines provide professional support and create synergy effects from pooling spend and expertise across thyssenkrupp.

## Consultation

This Statement has been prepared by thyssenkrupp's Sustainability department in collaboration with experts from other group functions and service lines, e.g. Legal & Compliance, Controlling, Accounting & Risk, Human Relations Management and Procurement & Supply Management. In addition, a meaningful

dialogue with key functions from the companies that are required to report under the Australia Modern Slavery Act and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act have been conducted.

<sup>2)</sup> thyssenkrupp complies with all local laws applicable to thyssenkrupp group companies. Where local laws and regulations conflict, directly or indirectly, with the initiatives described in this document, thyssenkrupp complies with those laws with a dynamic approach to worldwide compliance.

# Human Rights Due Diligence

## Governance

thyssenkrupp is committed to the highest sustainability standards, which encompass good corporate governance and environmental and social responsibility. For us, the focus is on people. This applies equally to everyone, both our own employees and our suppliers. Our fundamental values naturally include respect for human rights and environmental standards. We respect and support observance of internationally recognized human rights and fair working conditions. For example, we are committed to:

- the United Nations International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights)
- the core labor standards promulgated by the International Labour Organization (ILO)
- the principles of the United Nations Global Compact
- comply with all applicable laws, statutory provisions and standards in countries where we operate or are based
- comply with relevant human rights and environmental obligations
- the implementation of these frameworks throughout the whole group.

These global human and labor rights requirements are the basis for the thyssenkrupp human rights approach. Our approach is a well-established overall process looking back to a long company history. As a global corporate group, we do not only have an impact on the human rights of our own employees but also on the human rights of the employees of our suppliers and the

neighborhoods we operate in. Our holistic approach therefore covers our corporate culture, governance and organization, risk management, measures including communication, monitoring, grievance mechanisms and a continuous improvement process. We view human rights as an interdisciplinary task. Technical experts from various group functions are responsible for different individual human rights aspects. The subject matter experts from different group functions regularly come together to discuss human rights activities and identify cross-functional and multi-stakeholder needs for further enhancements of our human rights approach. Our subject matter experts include representatives from the departments Sustainability, Legal & Compliance, Controlling, Accounting & Risk, Human Relations Management as well as Procurement & Supply Management. In addition, there is a regular exchange between these departments and the experts from our businesses, ensuring that best practice examples are identified and communicated within thyssenkrupp.

Various policies and agreements ensure human rights standards throughout the thyssenkrupp Group. These policies are not only our written commitment but also actively create awareness of human rights within our management boards, the leadership teams and our employees. Our policies and activities are regularly reviewed and advanced where necessary. This becomes even more important as the German Act on Corporate Due Diligence Obligations in Supply Chains which has come into effect on January 1, 2023, has given us another impetus to further strengthen our efforts to safeguard highest standards for our suppliers as well as for our own business operations. More information can be found in the [Human Rights](#) section on our website.

## Risk Management

thyssenkrupp's groupwide risk management system follows a holistic and integrated approach and goes far beyond the early identification of risks required by law. Forward-looking risk management therefore also serves the interests of our stakeholders. Our transparent and systematic risk management system with structured processes contributes to an efficient monitoring and steering of the group's overall risks. Our risk strategy is focused on securing the existence of the company long-term and sustainably increasing the value of the company. The precondition for us to be successful as a company is identifying and evaluating the risks and ensuring that our employees manage them optimally. Our "Governance, Risk and Compliance (GRC) Policy" and the "Risk and Internal Control (RIC) Group Regulation" define basic principles for corporate governance and risk management at thyssenkrupp.

They also describe the group's universally applicable principles of risk policy framework for meeting the requirements of proper, consistent and proactive risk management. The principles are based on the thyssenkrupp mission statement and the strategic goals for the various business models; they serve as guidelines for professional and responsible risk management and thereby contribute to an appropriate reduction of risks. We continuously enhance thyssenkrupp's risk management system, align it with the internationally recognized Committee of Sponsoring Organizations of the Treadway Commission (COSO) model and integrate it with our internal control system and other management systems. The design of our various risk management tools ensures that the sub-processes are integrated in a continuous risk management loop and all risk managers are involved appropriately in the risk management process.

Our methods and tools to identify, assess, control and report risks are implemented throughout the group and we continually develop them when new requirements arise. We have organized risk management at thyssenkrupp as a combined top-down/bottom-up process. Binding process and system standards are formulated centrally at group level and apply to all operating entities. Responsibility for measuring and controlling risks along the value chain lies at local level with the managers in the operating entities. Employees responsible for risk management receive training on a regular basis and as required. We also use our groupwide web-based IT risk management tool to provide targeted information and training material.

Detailed information on thyssenkrupp's risk management system is provided in the [Annual Report 2024/2025](#).

The topic of sustainability has become increasingly important in recent years. Regulatory requirements for non-financial risk management and reporting have changed with great dynamism. Therefore, it is required to develop our risk management system constantly in order to keep pace with regulatory requirements. Thus, risks pursuant to the German Corporate Sustainability Reporting Directive Implementation Act that relate

to environmental, employee and social issues, human rights, anti-corruption and bribery are included in our risk catalogue as well. The so-called inside-out-perspective is also included in our risk definition, focuses on sustainability topics and concentrates on possible negative non-financial impacts in the event of a possible occurrence of risks. In the thyssenkrupp risk catalogue, human rights risks are embedded as part of multiple so-called risk causes, e.g. labor conditions and human rights, social conditions, occupational safety, human resources, qualification and diversity, subcontractor management, conflict minerals or suppliers. Risk effects, e.g. personal injuries or legal- and compliance-related cases, represent the inside-out-perspective – the assessment of our potential impact on society. Our training material for risk managers also covers a further extension of our risk management process with regard to above-mentioned non-financial risks and the assessment of thyssenkrupp's impact on these topics. Hence, the risk of human rights violations in thyssenkrupp's own operations and supply chain is considered to be low. No risks have been identified that need to be prioritized and the identified violations were implemented in a structured corrective action plan and were, or are, addressed by the respective thyssenkrupp Group companies responsible for the supplier.

## Focus on our own operations

At thyssenkrupp our claim "engineering.tomorrow.together." unites us all. We are all committed to the engineering of sustainable solutions, and we are convinced that we can produce the best results by working together. A corporate culture with shared values like team spirit, communication, commitment, a success mindset, and respect for colleagues, customers, investors as well as competitors is one of our key success factors. We live this culture every day and thyssenkrupp has implemented these values in several group policies and regulations:

### Our corporate culture and our mission statement

At thyssenkrupp, we are around 93.400 people with thousands of different lifestyles and cultures, but one thing unites us all: We are a team. We work together, learn from each other, and grow together. We are fair. We respect each other and communicate openly. We do what we say and say what we do. This value structure unites us and makes us successful. Our mission statement is our basic law. We developed it together to describe how we engage with customers, colleagues, investors, and society in general. We are proud that this is reflected in our commitment. We always openly encourage our employees to come to us if there are problems. That is important so that we can continuously improve. We believe in openness, mutual appreciation, and respect.

### Code of Conduct

While the group mission statement describes our goals and standards, the concrete principles and binding basic rules for our work and our behavior towards each other, business partners,

customers and the public are summarized in the thyssenkrupp [Code of Conduct](#). Our Code of Conduct is the standard and reference for employees, managers and board members and includes all basic principles and rules with respect to responsible and ethical conduct towards persons inside and outside of the group. It provides guidelines on topics such as human rights and fair working conditions, forced and child labor, the requirements for compliance, equality and non-discrimination, cooperation with the employee representatives, occupational safety and health, environmental and climate protection, prohibition of corruption and bribery as well as data protection and information security. While the Code of Conduct contains important information and guidelines for all employees to act in accordance with the rules, with integrity and in an ethically correct manner, thyssenkrupp Group Regulations and Instructions contain specific rules and requirements for concrete workplace situations and circumstances. These policies, directives and agreements are unconditionally valid and binding for all employees, managers and board members of the thyssenkrupp Group. In addition, thyssenkrupp has signed the United Nations Global Compact, the Association for Supply Chain Management, Procurement and Logistics (BME) Code of Conduct and the Diversity Charta.

### International Framework Agreement (IFA)

thyssenkrupp has always embraced its responsibility as a fair employer. We are a socially responsible corporate citizen, stand up for good working conditions worldwide. We also expect certain principles and standards from suppliers and business partners. For this, minimum standards are needed. That is why in 2015 thyssenkrupp AG, the Group works council, the metalworkers'

union IG Metall, and the global union federation “IndustriALL Global Union” entered into an International Framework Agreement on global minimum labor standards in the Group. As well as recognizing labor standards and human rights, the IFA includes principles on occupational safety and health, opportunities for career and personal development, the right to fair pay, and the prohibition of child and forced labor and all forms of discrimination. We want these standards and principles to be implemented everywhere throughout the thyssenkrupp Group and expect our suppliers to comply with these standards as well. The responsibility for the implementation of the above-mentioned IFA lies with the management boards of the businesses.

The awareness of responsible persons, such as managers and all employees, shall be raised and employees’ representatives shall be involved in this process. In case of justified complaints responsible directors or management boards, if necessary involving the responsible person in regional headquarters, will take necessary steps to remedy. Here, they as well as employees and employee representatives shall make full use of all possibilities to solve the conflict locally. As part of the IFA we have established an International Committee with the purpose of additional control and for regular exchange on adherence to and implementation of this agreement. The Committee is composed of representatives from the Group Works Council, the European Works Council, IG Metall and the IndustriALL Global Union. If required, further participants can be called in. The CHRO reports to the International Committee on the status of implementation and adherence to the framework agreement at least once a year. The International Committee can propose appropriate measures to be taken to remedy violations, if local or national mediation possibilities have been used without success. It can also make proposals for further measures with the objective to prevent future violations. Additionally, the representatives of the International Committee visit at least one production site of a company or multiple companies of the Group. The region or country is selected annually by the International Committee after consultation with the CHRO. The results of these regular on-site audits are discussed with the CHRO and additional measures are implemented if necessary.

### **Principles of compliance with human rights and environmental due diligence requirements**

Responsibility for and implementation of due diligence obligations for the protection of human rights and the environment in accordance with the German Act on Corporate Due Diligence Obligations in Supply Chains is an integral part of the overarching sustainability strategy and goals of thyssenkrupp. Our understanding of these due diligence obligations are anchored in our [Principles of compliance with human rights and environmental due diligence requirements](#).

### **Occupational Safety & Health standards**

The thyssenkrupp Occupational Safety & Health (OSH) standards are implemented in various group policies and regulations. Most importantly in the Group Mission Statement, the Code of Conduct, the Group OSH Policy and in detail in the Group Regulation “Occupational Safety and Health” in combination with the OSH Management Manual which is in accordance with

the international standard ISO 45001. Topics covered do not only include physical aspects of safety at work but also mental health. The aim of our Occupational Safety & Health standards is to create a consistent groupwide understanding of occupational safety and health management, to define responsibilities, duties, and minimum standards in occupational safety and health management (to supplement the existing statutory regulations), to create an appropriate organizational body for occupational safety and health management for avoiding incidents and work-related illnesses as well as building awareness, motivation, and abilities to promote individual health, and enabling the inclusion of employees with restricted capabilities as much as possible at thyssenkrupp. This applies for our own employees as well as for contractors.

### **Diversity & Inclusion**

Diversity & Inclusiveness Management is a fixed part of our responsible employer policy. This is also demonstrated in our management principles and with our signing of the “Diversity Charta” (Charta der Vielfalt) as well as with our commitment to the “Free & Equal Initiative of the UN Human Rights Office” which we signed as one of the first 100 companies, tackling discrimination against LGBTI people. The working environment at thyssenkrupp is characterized by diversity, which also includes different flexible models for working hours (e.g. part-time, part-time apprenticeships, job sharing). We have increasingly switched to hybrid working wherever this is possible from an operational perspective: working remotely or in the office is a standard element of flexible models for employment and working hours. In addition, thyssenkrupp supports its employees with childcare, company owned kindergartens and support with homework. Internally, we use gender-neutral language and support employee networks (Women’s networks like wow!, women@MX etc., pride@tk network, tk turkish community, power of cultures network). We want everyone who works for us to be able to reach their full potential – irrespective of origin, gender, skin color, religious beliefs, political or other convictions, disabilities, age, sexual orientation and identity and other factors. Important targets of our diversity management are bringing more women in leading positions and enabling compatibility of family and work also for men. Already in 2015, thyssenkrupp also issued a statement expressing its commitment to inclusion. Inclusion is aimed at equal participation and involvement by all people in public life. In the joint statement by the Executive Board and employee representatives, we commit to recruiting and supporting people with disabilities and to reporting regularly on progress with inclusion. Nobody should be excluded from leading a self-determined life because of disability, and this includes the right to an education and the right to work. thyssenkrupp regards workplace inclusion, i.e. self-determined and equal participation by people with disabilities in working life, as a special corporate responsibility.

### **Employee Pulse Check**

Among our fundamental values is a corporate culture that is defined by openness, honesty and mutual respect; it is a vital prerequisite for successful changes. Once a year, the company carries out the groupwide Employee Pulse Check, a brief online survey on employee satisfaction and success factors in change such as leadership and communication.

All segments participated in 2025, giving almost all employees the possibility to provide feedback. As a result, the survey's reach was slightly higher than a year earlier. The main findings are reported to the Executive Board and Supervisory Board of thyssenkrupp AG and to the employee representative body. The business-specific findings are analyzed locally and serve as the basis for a more in-depth dialog aimed at developing

improvement measures. The continuous increase in the response rate in recent years highlights employees' interest and their willingness to provide feedback.

More information can be found in the [Corporate Culture, Compliance, International Framework Agreement](#) and [Responsible Employer](#) sections on our website.

## Focus on the supply chain

As we are committed to treating employees, customers, suppliers and local residents responsibly and fully respect human rights in our internal operations, we expect our business partners, and particularly our suppliers and subcontractors, to share this commitment with us. At thyssenkrupp, acting responsibly is therefore firmly integrated into our procurement processes. The service line Procurement & Supply Management at thyssenkrupp Services provides groupwide harmonized instruments and approaches for sustainability in the supply chain, which are applied and reported by the businesses. Adhering to high ethical standards also plays a vital role in our supply chain management. Since 2011, thyssenkrupp has continuously developed and implemented instruments to ensure sustainability in the supply chain. When awarding contracts, our decisions are not only based on economic criteria: In our procurement activities, we not only observe legal, commercial, technical and process-related criteria, but also consider social and ecological aspects such as human rights, working conditions, anti-corruption, as well as environmental and climate protection. As part of our supplier qualification, we have already established processes to prevent potential negative impacts in respect of human rights and environmental matters. For example, as a matter of principle, we expect potential new suppliers to recognize the requirements of our Supplier code of Conduct and implement the defined standards accordingly. In order to satisfy the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), thyssenkrupp developed a groupwide concept and a corresponding organizational structure to create a sustainable culture for compliance with human rights and environment-related due diligence obligations.

### Human rights and environment-related due diligence

Based on the individual supply chain act (SCA) risks, we subject our direct suppliers including transport and logistics providers to a twice-yearly risk analysis and identify their risk potential. The risk potential identified is an abstract calculation using external risk indices of the potential risk to which the supplier is exposed due to factors such as geographical location and industry. Furthermore, we take into account factors such as the scope of business activities (our purchasing volume), the type of goods supplied and the severity and reversibility of potential events. This abstract risk potential is refined by more in-depth analysis of a supplier-specific risk assessment ("SCA risk category") based on information that is either already available or obtained for this purpose, such as certificates. We distinguish between five SCA risk categories: "very low", "low", "moderate", "high" and "very

high". Our group companies refer to this risk category to take appropriate preventive measures to mitigate the supplier's risk. These measures allow us to mitigate the risk of potential human rights and environmental-related violations at our suppliers. We understand appropriate measures here to also mean that the risks identified as part of the properly conducted risk analysis are recognizable and that reasonable measures are implemented accordingly. Our preventive measures include, for example, the acknowledgment of the thyssenkrupp Supplier Code of Conduct and conducting supplier training courses. Findings on indirect suppliers are included in our risk analysis on an ad hoc basis. If thyssenkrupp becomes aware of any violations of a human rights or environment-related obligation at a direct or indirect supplier, immediate and appropriate measures should be initiated by thyssenkrupp aimed at ending this violation.

### Supplier Code of Conduct

As a central element, our Supplier Code of Conduct formulates the requirements that we place on our suppliers with regard to operating responsibly, lawfully and ethically throughout their business activities and supply chains. It requires suppliers to comply with all applicable laws and internationally recognized standards on human and labor rights, environmental protection, and anti-corruption and must be recognized by our suppliers. In particular, we expect suppliers to exclude child labor, forced labor and trafficking in human beings and to ensure a non-discriminatory working environment and fair working conditions, i.e., adequate wages, working time and safety standards. Environmental protection is also a central component of the Supplier Code of Conduct. Our suppliers are required to comply with applicable environmental regulations, reduce emissions, use resources responsibly and minimize the risks associated with handling hazardous substances. Furthermore, integrity in the business environment is required, including for example zero tolerance for corruption, the prohibition of bribery and prevention of money laundering. To ensure responsible corporate governance aligned to long-term value creation, we include our suppliers directly into our sustainability strategy. As a central element, the thyssenkrupp Supplier Code of Conduct addresses our expectations of suppliers and their subcontractors based on legal requirements, comparable regulations in other countries, international agreements and principles and our own sustainability standards. We expect all our suppliers to acknowledge the Supplier Code of Conduct and to meet the expectations it specifies. The Supplier Code of Conduct addresses possible risks and negative impacts along the supply chain and

requires our suppliers in particular to safeguard human rights, ensure fair working conditions, actively protect the environment and avoid human right violations caused by environmental harm, combat corruption, and create transparency on the origin of conflict minerals.

### **Conflict minerals and high-risk raw materials**

The mining of certain minerals can contribute to significant human rights abuses and to the financing of violent conflicts in the originating regions. Due to the higher risk, the US Conflict Minerals Regulation (Dodd-Frank Act) and the EU Conflict Minerals Regulation set minimum legal due diligence and reporting requirements for the sourcing of these minerals. These regulations also put emphasis on certain regions, e.g. the Democratic Republic of Congo (DRC) and the adjoining countries, where there is a particularly higher risk. Conflict minerals contain tantalum, tin, tungsten (and the ores from which they originate) and gold, regardless of where they are sourced, processed or sold.

thyssenkrupp expects its suppliers to duly exercise their duty of care to promote responsible raw material supply chains and to comply with all applicable statutory rules pertaining to conflict materials – this is also embedded in our Supplier Code of Conduct. We expect conflict minerals to be procured from conflict-free sources. In cases where a product contains one or

several conflict minerals or high-risk raw materials, thyssenkrupp expects its suppliers to assure and provide, on request, transparency of their supply chain all the way to the smelter and origin of the material. The aim is to exclude smelters without an adequate or certified due diligence process. Our businesses bear the responsibility to manage conflict minerals within their company. Additionally, the companies report their annual import volume of conflict minerals to the service line Procurement & Supply Management, to ensure transparency of processes and internal regulations. The goal of the conflict minerals subject matter experts within our groupwide Procurement & Supply Management is to continuously exchange knowledge and better practices to ensure that the sourcing of conflict minerals does not contribute to significant human rights abuses and to the financing of violent conflicts in the originating regions. thyssenkrupp AG (including all its subsidiary companies) does not file reports with the SEC and therefore has no legislative obligations to comply with the conflict minerals requirements covered in Section 1502 of the Dodd-Frank Act. At the same time we recognize the SEC final rule for Section 1502 mandates our direct and indirect customers to undertake due diligence across their global supply chains and thus go beyond legal requirements.

More information can be found in the [Responsible Procurement](#) section on our website.

## **Training and communication**

Human rights are communicated by the various departments multiple times per year and all our policies and guidelines can be accessed via the intranet 24/7. To ensure that all employees at our production sites have access to our communication, wallpapers inform about the values and standards of the IFA. They furthermore explain the grievance mechanism including how potential violations can be reported and where further support can be found.

We use our training formats to raise our employees' awareness of our human rights and environmental due diligence obligations. The training courses explain our due diligence obligations, explain why these due diligence obligations are of importance and how we want to achieve compliance with the due diligence obligations in the thyssenkrupp Group. The training courses also outline the various channels of our complaint's procedure. Employees learn how they can play their part in complying with due diligence obligations – whether in relation to our own business area or in cooperation with our suppliers – and whom they can contact if they become aware of potential breaches of duty. Proof of the effectiveness of the e-learning, whose rollout began on September 30, 2023, is provided in the form of a certificate, which is issued following successful completion of the final test. Up to end of the 2024/2025 fiscal year, we trained around 23,000 employees of thyssenkrupp worldwide on human rights via e-learning.

Communication and information are essential elements for developing a safety and health culture at thyssenkrupp. For many years now, our global programs to promote a culture of safety and health have been running under the motto "we care". One highlight is our "we care" Days event, which takes place every year around April 28 to mark the World Health and Safety Day. Communication campaigns, workshop formats and tools for everyday work help to make occupational safety and health issues an intensive topic of discussion directly at our sites. Occupational safety and health are topics of everyday work. For this very reason, the "we care"-Days are used to focus on various topics in greater depth. For this purpose, concepts, workshop formats and tools are developed that can be used independently in our companies. The main topics were, for example, raising awareness of major accident risks, dealing with unsafe conditions and behavior, and discussing strategies for resilience and stress management. With our OSH standards and our global cultural program "we care", we promote preventive measures and actions so that everyone who works for thyssenkrupp returns home safe and sound.

## Grievance mechanisms

Speaking up and holding others accountable are values that are important for thyssenkrupp. It is essential for us to counteract violations at an early stage and review concerns relating to serious misconduct – with or without revealing their identity. Bona fide reports help reveal suspected wrongdoing at an early stage and limit the damage for our company, our employees, and our business partners. We have set up several channels to contact us and to report possible infringements, including any matters concerning misconduct in the area of human rights violations, not only at thyssenkrupp, but also regarding possible violations at our suppliers. The system for reporting information is open to all thyssenkrupp employees as well as third parties such as customers, suppliers and others.

### Compliance Whistleblowing System

We encourage all our employees to address suspected compliance violations through the grievance or dispute resolution channels. Since an open communication culture is a key component of a functioning compliance program, ideally, our employees can talk openly to their supervisor. Alternatively, contacting our Compliance department is possible and encouraged. Employees of thyssenkrupp can also contact their compliance officer or the compliance manager responsible for their company directly. A detailed list of contacts is available on the intranet. Non-employees should contact their business partner. Additionally, the thyssenkrupp Compliance Whistleblowing System is available to report possible compliance violations of laws or guidelines within the Group – anonymously if required. Possible violations of human rights at suppliers as well as possible environmental issues can also be reported via the thyssenkrupp Compliance Whistleblowing System and will be handled by the responsible departments.

Our [electronic Compliance Whistleblowing System](#) on the internet is available in 34 languages, and is open to all thyssenkrupp employees, customers, suppliers, and other third parties to report cases where compliance standards and principles are not being followed. Reports can also be submitted at any time via a telephone hotline or the Compliance Organization. Reports will generally be reviewed and handled by the Compliance Officers of thyssenkrupp Group. Any necessary follow-up communication between the Compliance Officer and the whistleblower is possible through a secure mailbox and is anonymously if desired.

thyssenkrupp takes the interests of the whistleblower very seriously and will do everything possible to safeguard informants acting in all conscience against potential difficulties resulting

from reporting misconduct. This is done not only through the secure Compliance whistleblowing System, but also by providing assurance that all information received by group function Legal & Compliance at thyssenkrupp AG will be treated as confidential. Therefore, the Compliance Organization at thyssenkrupp comprises its own Investigations Department that – in close collaboration with internal auditing – systematically tracks, investigates and responds to allegations or incidents, explicitly including those reported through our various compliance whistleblowing channels. To always ensure independent investigation, our Investigation Department is strictly separated from the preventive part of our Compliance Organization in charge inter alia for Compliance advice. During its investigations, thyssenkrupp will strive to protect the legitimate interests of other persons affected by a disclosure. Casting suspicion on another person can have serious consequences for that person. It is essential that the Compliance Whistleblowing System is used responsibly, and that strict confidentiality and privacy is maintained throughout the entire process. Further information on the whistleblower system at thyssenkrupp can be found in the [whistleblowing rules of procedure](#). Where legally obliged, separate whistleblowing channels are installed.

### Additional measures for potential human and labor rights violations

In addition to our general Compliance Whistleblowing System, thyssenkrupp offers a whistleblowing system especially focused on potential human labor rights violations that is implemented via the International Framework Agreement on global minimum labor standards in the thyssenkrupp Group. In case of a conflict, the persons concerned can address the responsible person on the site, e.g. supervisors, responsible employees' representatives or compliance managers. Information about possible violations of the provisions of the International Framework Agreement can also be reported via email through internal company communication channels or via an online reporting system that is available in 10 languages. Persons who report violations must not be subject to any disadvantages. All employees and third parties can use the system – with or without revealing their identity – to report cases where standards and principles are not being observed. An International Committee with representatives from the Group Works Council, the European Works Council and the union is authorized to intervene in the event of infringements or disputes that cannot be resolved locally. In accordance with the International Framework Agreement, incoming reports will be processed in consultation between the International Committee and thyssenkrupp.

## Partnerships and stakeholder engagement

For many years, thyssenkrupp has been participating in various working groups and best practice exchanges with regard to business and human rights, e.g. at econsense (German network of internationally operating companies with the goal of shaping the change to a more sustainable economy and society), the UN Global Compact Network, the Human Rights Working Group of the German Institute for Compliance, the Federation of German Industries as well as several other associations and

organizations. We highly appreciate that many of our customers and suppliers come together in industry associations and discuss human rights and supply chain topics since this creates multiplier and leverage effects and can have a material positive impact. In addition, we also have a regular exchange with our customers and discuss their specific human rights requirements from thyssenkrupp as a supplier, the current thyssenkrupp approach as well as further points of action.

## Effectiveness of actions

To ensure that thyssenkrupp's actions to assess and address the risk of human rights in our own operations and supply chain are effective, different processes are implemented. The effectiveness of preventive measures is assessed on an ongoing basis. The key factor here is monitoring whether the measures implemented have reduced the risks identified at our suppliers.

The description of the different processes is integrated in the chapters above:

- The annual update of the thyssenkrupp Modern Slavery Statement includes a feedback process between relevant group functions and service lines as well as with key functions from relevant group companies (so-called reporting entities). Finally, the Modern Slavery Statement is approved by relevant group functions and service lines as well as our Executive Board. For more information please see chapters "Consultation", "Governance" and "Approval of Executive Board".
- Our risk assessment processes are updated at least annually. For more information please see chapter "Risk Management".

- We regularly engage with industry groups and peers in order to ensure that all relevant and new requirements in terms of human rights are adequately assessed and implemented at thyssenkrupp. For more information please see chapters "Focus on our own operations" and "Partnerships and stakeholder engagement".
- Our sustainability reporting that is fully integrated in our Annual Report is externally audited. This reporting includes setting targets, tracking our measures and sustainability linked remuneration. For more information please see chapter "Targets and Results".
- Our due diligence and monitoring approaches for ensuring the effectiveness of activities in our own operations and the supply chain, e.g., exchange with works councils, industry associations or legal experts as well as supplier audits, working with suppliers on preventive and remedial measures or access to remedy, are described in the chapters "Focus on our own operations" and "Focus on the supply chain".

## Targets and Results

Openness, equality of opportunity and mutual respect are among the central values of our corporate culture. thyssenkrupp aims to continuously improve its performance by having set multiple non-financial targets.

With a view to equal representation of women, in 2011 thyssenkrupp set itself a voluntary target to increase the proportion of women in leadership positions. The increase of this share from just 8% in 2011 to 17.5% as of September 30, 2025, shows that thyssenkrupp has made progress. Indeed, it already exceeds the target of 17% by the end of the next fiscal year 2025/2026. At the time the target was set, the figure of 16% was the share of women in thyssenkrupp's total workforce.

In the interest of continuously improving occupational safety, thyssenkrupp monitors the company's accident situation. The accident frequency rate is the key indicator used here. It is recorded each month by all units worldwide and is a regular

subject at Supervisory Board and Executive Board meetings. The value of 2.7 did not meet our target for the past fiscal year. One fatal accident involving a company employee occurred at a third-company site during the reporting period. There was also one fatal accident involving an employee of a partner company. The full investigation of such tragic incidents is aimed at helping to prevent them in the future. In these specific cases, action included amending the operating procedures and safety training.

As an indicator of employee satisfaction, we strive to continuously improve the employee Net Promoter Scores (eNPS) to a positive value by fiscal year 2025/2026. The thyssenkrupp eNPS is part of the annual Employee Pulse Check survey and indicates the willingness of employees to recommend thyssenkrupp as an employer.

Starting in fiscal year 2023/2024, we have included the High Risk Supplier Reduction (HSR) as a key indicator to implement

the annual reduction in the proportion of suppliers still classified as high risk – even after any risk-mitigating measures – relative to the total population of potentially high-risk suppliers in long-term compensation. Risk categorization is based on the risk analysis required by the LkSG. In this way, we aim to achieve a general reduction in the risk of violating the legal provisions of this legislation in respect of environmental protection, human rights and occupational safety within our portfolio of suppliers. Further, if other risks are identified in the annual and ad hoc risk analysis, these must be mitigated as soon as possible by prompt measures that are consistent with the provisions of the legislation.

All four non-financial targets, which reflect the proportion of women in the workforce as a whole, the accident frequency

rate, the employee Net Promoter Score and the High Risk Supplier Reduction (HSR), are a criterion for Executive Board compensation and thus, parameters in the Long-Term Incentive Plan. In fiscal year 2024/25, due to its significance, we have again integrated the continuous improvement of the accident frequency rate into long-term compensation. All established non-financial targets (NFT) are being continued with the aim of continuous improvement and are constantly being adjusted and extended in parallel with our ongoing strategic development.

More information on thyssenkrupp's non-financial targets can be found in the [Sustainability Strategy](#) section on our website and in the [Annual Report 2024/2025](#).

## Continuous Improvement

We are committed to continuous improvement in identifying, reducing, and preventing risks of modern slavery across our operations and supply chains. We regularly review and strengthen

our processes, enhance due-diligence measures, and work closely with our partners to drive sustainable improvements and uphold human rights standards.

# Approval of Executive Board

In compliance with the requirements of the UK Modern Slavery Act (2015), the Australian Modern Slavery Act (2018), the Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (2024) and the California Transparency in Supply Chains Act (2012) this Statement has been approved by the Executive Board of thyssenkrupp AG on March 10, 2026.

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