Sustainability report

Contents

1. General information

About this report

Sustainability is a core component of thyssenkrupp's mission statement and an integral part of our corporate strategy. In this sustainability report, we disclose our environmental, social and governance performance, thereby creating transparency in respect of our corporate responsibility.

We have prepared the sustainability report in fulfillment of the requirements of Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 (Corporate Sustainability Reporting Directive, CSRD) and with the requirements for a consolidated non-financial statement contained in §§ 315b and 315c of the German Commercial Code (HGB) and for a non-financial statement contained in §§ 289b to 289e HGB. Since the 2022 / 2023 reporting year, we are required to make additional disclosures on the taxonomy alignment of our economic activities within the framework of the EU Taxonomy. These disclosures are also integrated into the sustainability report.

The sustainability report was prepared for the first time and with full application of the first set of the European Sustainability Reporting Standards (ESRS) as the framework. The non-financial statement for thyssenkrupp AG was prepared without application of a framework.

The CSRD marks a significant step toward greater transparency and comparability in sustainability reporting by European companies and significantly expands the disclosure requirements for reporting undertakings. It entered into force in the EU on January 5, 2023, and must be transposed into national law by the member states. The ESRS give substance to the requirements outlined in the CSRD. As a Delegated Regulation, they should be applied directly in all EU member states.

The ESRS precisely define the reporting obligations. Reporting follows the principle of double materiality: Undertakings must report material sustainability matters, in terms of both the impact of their operations on society and the environment as well as the economic relevance of the risks and opportunities caused by external influences. Furthermore, in the separate subsections of the sustainability report, we address risks resulting from negative impacts of thyssenkrupp's operations on non-financial aspects such as the environment and society. Based on our risk analysis, no additional material non-financial risks have been identified that have to be reported in accordance with § 289c HGB.

The contents of the sustainability report relate to fiscal year 2024 / 2025 and apply equally to the thyssenkrupp group and thyssenkrupp AG.

The following table shows how sustainability matters in accordance with the requirements of the HGB are reconciled to the ESRS topical standards that are material for thyssenkrupp. It also shows the sections in which these matters are described.

RECONCILIATION OF NON-FINANCIAL DISCLOSURES TO THE ESRS

HGB sustainability matters	Section in the sustainability report
Environmental matters	ESRS E1: Climate change ESRS E2: Pollution ESRS E3: Water and marine resources ESRS E5:Resource use and circular economy EU Taxonomy
Employee matters	ESRS S1: Own workforce ESRS S2: Workers in the value chain EU Taxonomy
Social matters	ESRS S1: Own workforce ESRS S2: Workers in the value chain ESRS S3: Affected communities ESRS E1: Climate change ESRS E2: Pollution ESRS E3: Water and marine resources ESRS E5:Resource use and circular economy EU Taxonomy
Respect for human rights	ESRS S1: Own workforce ESRS S2: Workers in the value chain ESRS S3: Affected communities
Anti-corruption and anti-bribery	ESRS G1: Business conduct EU Taxonomy

We apply the ESRS structure in this report. The sustainability report index shows which ESRS disclosures are material to thyssenkrupp and where they are located in the report. This index can be found in this section under “IRO-2 Disclosure requirements in ESRS covered by the undertaking’s sustainability report.”

ESRS 2 General disclosures

Basis for preparation

BP-1 – General basis for preparation of the sustainability report

The sustainability report was prepared on a consolidated basis. The scope of consolidation of the sustainability report is identical with that of the consolidated financial statements and covers thyssenkrupp AG as the parent company and the company’s subsidiaries. As a joint operation, 50% of steel producer Hüttenwerke Krupp Mannesmann (HKM) is recognized in the consolidated financial statements – reflecting thyssenkrupp’s investment – and this same proportion is included in the environmental and other selected key indicators.

In addition to our own operations, this sustainability report also covers the upstream and downstream value chain. In performing the double materiality assessment (see “IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities” later in this section), we considered both our own activities and those in the upstream and downstream value chain in order to identify material impacts, risks and opportunities. If necessary, we provide information on the upstream and downstream value chain in the topical sections.

In preparing the sustainability report, we have not made use of the option to omit certain information concerning intellectual property, know-how or the results of innovation. We have also not made use of the option to omit disclosures of impending developments or matters in the course of negotiation.

BP-2 – Disclosures in relation to specific circumstances

The recording of the metrics presented in the sustainability report is based on uniform definitions. Depending on data availability, the metrics are quantified by direct measurement, calculation, modeling or estimation. Detailed information can be found in the sections relating to the various topical standards. In the event of limited data availability or methodological challenges, we made estimates or assumptions. This may result in inaccuracies that we explain in the following paragraphs. We make every effort to continuously optimize the accuracy and reliability of the reported metrics and estimates within the framework of the applicable methodological and organizational requirements.

- Individual pollutant emissions disclosed pursuant to ESRS E2-4 are model-based estimates because no direct measured data are available in certain cases. The uncertainty of these figures results mainly from the methodology chosen, the quality and availability of the input data and the representative nature of the underlying assumptions. Despite plausibility checks, the accuracy of individual emission data may be limited. However, we consider the impacts on the completeness and reliability of the overall results to be insignificant.

- A model-based estimation factor is applied in disclosing the proportion of secondary reused or recycled materials in accordance with ESRS E5-4 AR 31(c) because no complete primary data for these materials are available from the procurement processes at this time. This factor is based on a global material flow balance which records annual raw material flows and only considers the proportion of recycled materials to be circular. As product service lives and inventories are not included, uncertainties exist as to the accuracy but these are considered to be acceptable overall.

- At present, no aggregated primary data relating to the material composition of the products brought to the market are available at group level. For this reason, a model-based estimation is applied in disclosing the proportion of recyclable materials in accordance with ESRS E5-5 AR 36(c). The material composition was derived instead from the resource inflows recorded. Information on the potential recyclability of the main material flows obtained from external sources was used to estimate the proportion of recyclable materials. The methodology is based on simplifying assumptions and approximations that may result in accuracy uncertainties. Overall, these uncertainties are considered to be acceptable. Further information can be found in subsection “E5-5” in the section headed “ESRS E5 Resource use and circular economy.”

- Quantification of the indirect GHG emissions along the upstream and downstream value chain (Scope 3) is based in part on estimates – especially for emission categories for which there are no primary data such as supplier-specific information. In such cases, secondary data were used, including emission factors from recognized databases such as the International Energy Agency (IEA) database and the commercial Sphera database, industry averages and other suitable emission factors. Although the use of indirect data may have a negative impact on the accuracy of individual Scope 3 categories, we consider the impacts on the completeness and reliability of the total greenhouse gas balance to be insignificant overall.

Forward-looking information and data, both the company’s own and from third parties, inherently involve uncertainties. Such disclosures are often based on assumptions, expectations or forecasts based on currently available knowledge. Changes in framework conditions, technological developments or regulatory requirements are among the factors that may cause actual developments to deviate from the expectations presented. Against this backdrop, we would point out that forward-looking statements about both financial and non-financial matters are no guarantee that expected results will actually occur. Various systemic uncertainties and external factors relating to the assessment of impacts, opportunities and risks may result in actual results or events deviating from the estimates presented in the sustainability report.

With the first set of the ESRS, the EU Commission has provided criteria for consideration in preparing sustainability reports in accordance with the CSRD. However, some of the terms and formulations remain subject to uncertainty because no authoritative interpretations have yet been published. In this sustainability report, we explain our interpretations of the criteria in the topical sections where necessary.

Governance

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

The management of thyssenkrupp is the responsibility of its parent company, thyssenkrupp AG, which is a joint stock company established under German law with a dual management and control structure consisting of the Executive Board and Supervisory Board as required by German law.

Executive Board

The Executive Board is responsible for managing the company on its own authority and in the interest of the company, i.e., with the aim of sustainable value creation and taking into account the concerns of the shareholders, employees and other stakeholders and the interests of thyssenkrupp. The Executive Board provides the Supervisory Board and the responsible committees with regular reports about matters relating to strategy, planning, business performance, risk management, compliance and sustainability that are of relevance to the company and the group. It aligns the strategic orientation of the company and the group with the Supervisory Board and regularly discusses the status of strategy implementation with this body.

In the reporting period, the Executive Board was composed of five executive members, four men and one woman. This equates to a proportion of 80% men and 20% women. The members of the Executive Board are appointed by the Supervisory Board. Regarding the composition of the Executive Board, the Supervisory Board considers the existing diversity policy for the Executive Board, including other diversity and factual criteria such as personality, expertise and experience, internationality, training and professional background as well as age and gender.

The Executive Board as a whole and its members have the relevant expertise to perform their tasks properly. The individual Executive Board members contribute different types of knowledge, skills and experience that include, for example, many years of experience in the areas of corporate governance, finance, mergers and acquisitions, change management/transformation and human resources in various industry sectors as well as substantial international experience. The Executive Board members are responsible for the sustainability matters in their respective directorates and, among other things, have the knowledge and experience gained as a result of their respective profiles and activities. In addition, the Executive Board can draw on the expertise and experience of the relevant specialist departments within the company and of external experts; this includes knowledge and experience of material sustainability matters.

Supervisory Board

The Supervisory Board advises and oversees the Executive Board in the performance of its duties and is involved in fundamental decisions taken by the company. Its activities also relate to sustainability matters. The Supervisory Board appoints the Executive Board and defines the members' areas of responsibility (directorates).

The Supervisory Board of thyssenkrupp AG is composed of 20 non-executive members, ten shareholder representatives and ten employee representatives in accordance with statutory requirements. Under the Articles of Association, the Alfried Krupp von Bohlen und Halbach Foundation has a corresponding right of appointment. The other shareholder representatives are elected by the Annual General Meeting. In the reporting year, the Supervisory Board had eight female members. This equates to a proportion of 60% men and 40% women. In accordance with the recommendations of the German Corporate Governance Code, all the shareholder representatives are independent.

The Supervisory Board and its members have the necessary knowledge, skills and experience to carry out their supervisory and advisory activities properly. In accordance with the recommendations of the German Corporate Governance Code, the Supervisory Board has defined specific targets for its composition and a competency profile. Taken as a whole, the Supervisory Board should have industrial expertise/sector knowledge in the fields in which thyssenkrupp operates, expertise in corporate development, organization and structuring, corporate strategy, business conduct, human resources, digitalization and IT, sustainability, financing and capital markets, accounting and auditing, law, compliance and corporate governance, and international experience. The current composition of the Supervisory Board meets the targets and the competency profile. The Supervisory Board members receive organizational and financial support for training and development measures that enable them to perform their duties. To supplement this, the company offers information events and training sessions on specific topics, including sustainability matters.

The Supervisory Board's targets for its composition are also based on the diversity model for the Supervisory Board and, in addition to a gender quota, concern the international operations of thyssenkrupp, potential conflicts of interest, the number of independent Supervisory Board members, an age cap for Supervisory Board members and a limit for the time served as a Supervisory Board member. The diversity model and the targets for the composition of the Supervisory Board are implemented by electing the members of the Supervisory Board.

The Supervisory Board of thyssenkrupp AG has also established six committees: the Executive Committee, the Mediation Committee in accordance with § 27 (3) of Germany's Codetermination Act (MitbestG), the Personnel Committee, the Audit Committee, the Strategy, Finance and Investment Committee and the Nomination Committee. The members of these committees prepare the resolutions for the full Supervisory Board and perform the tasks assigned to them on the basis of the rules of procedure for the Supervisory Board and for the respective committee. The chairs of the committees report regularly on the meetings and work of the committees at the Supervisory Board meetings.

Responsibilities and governance in respect of sustainability issues

The Executive Board and Supervisory Board are also responsible for managing and monitoring impacts, risks and opportunities on the basis of the dual management and control structure required by German law. The respective responsibilities are defined in the rules of procedure for the Executive Board and for the Supervisory Board and its committees, in the Schedule of Responsibilities for the Executive Board, in the company's regulations and in the approval and consultation obligations specified for the entire company. As the senior management body, the Executive Board defines the company's strategic alignment and business targets, also taking account of the relevant sustainability matters. In addition, the Executive Board has developed and implemented an organizational and governance framework aimed at ensuring appropriate and effective internal control and risk management. This also takes account of the sustainability-related targets that are of relevance for the company.

The Supervisory Board also exercises its supervisory and advisory function in respect of the sustainability-related aspects of its duties. It receives regular information from the Executive Board on this subject. Moreover, the respective sustainability matters are an integral aspect of the work of the respective Supervisory Board committees. This applies particularly to the Strategy, Finance and Investment Committee, which examines the sustainability matters associated with the corporate strategy and investments, and to the Audit Committee in respect of its role relating to the annual report and the audit topics.

The groupwide management framework is based on an integrated governance, risk and compliance (GRC) model. The organizational framework for the GRC model at thyssenkrupp is the three lines model. This shows which line is responsible for risk management in the broadest sense within the group. It helps to identify organizations, structures and processes that facilitate strong governance and strong risk management. Within this governance framework, the Corporate Function Internal Auditing serves as the independent third-line oversight function and supports executive management in the exercise of its responsibility. Internal Auditing reports directly and independently to the Executive Board of thyssenkrupp AG and, if necessary, to the Supervisory Board. The central Corporate Function Sustainability coordinates and supports the company's strategic sustainability management and environmental management. Specific

topic areas are handled by and are the responsibility of the relevant specialist units, for example, the Corporate Function Legal & Compliance and the Corporate Function Human Resources; these report on current developments to the Executive Board member responsible for the respective directorate.

Strategic sustainability management within the company is managed and enhanced in conjunction with the Sustainability Committee. Further explanations and information on the composition of the Sustainability Committee can be found in subsection "ESRS 2 GOV-2" below.

Further information on the Executive Board and Supervisory Board as well as on the key corporate governance principles and practices can be found in the "Corporate governance statement;" further information on the groupwide risk management and internal control systems can be found in the subsection headed "GOV-5 – Risk management and internal controls over sustainability reporting" in this section and in the "Opportunity and risk report" in the management report.

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

Our governance structure for sustainability

Responsibility for sustainability is clearly defined at thyssenkrupp. Strategic sustainability management is coordinated by the Corporate Function Sustainability. As well as preparing the sustainability strategy, the Corporate Function Sustainability drives cross-cutting sustainability projects and programs within the company. Together with other corporate functions, service lines and segments, the Corporate Function Sustainability continuously identifies stakeholder requirements, from which it derives targets and actions to improve our sustainability performance. The monitoring and management of the material impacts, risks and opportunities is the responsibility of the respective corporate functions, which report current developments to the Executive Board member responsible for the respective directorate. In the course of preparing the first sustainability report in accordance with the CSRD, Sustainability expanded its regular working and discussion formats with the specialist departments. The goal is to strengthen collaboration between the segments and units when it comes to the practical implementation of the sustainability policies developed within the group.

The role of the Executive Board and Supervisory Board in sustainability management

Sustainability activities at thyssenkrupp are managed groupwide by the Sustainability Committee. This body is composed of the Executive Board members, the segment CEOs, the heads of the corporate functions and the company's sustainability experts. The Sustainability Committee takes decisions on evolving existing actions, implementing innovative actions and new strategies, and setting sustainability-related targets. It receives reports from the Corporate Function Sustainability on the current status every six months and on an ad hoc basis, enabling it to systematically monitor the group's sustainability performance. In the course of this work, the Sustainability Committee is supported by the Corporate Function Sustainability, which provides reports on the relevant metrics, developments and initiatives concerning material sustainability topic areas.

Sustainability matters and the progress of their implementation are integral items on the agenda of the regular meetings of the thyssenkrupp Executive Board, which take place at least twice monthly in accordance with a defined annual schedule. Among other things, the Executive Board received information on the performance and outcome of our double materiality assessment, which identified the material impacts, risks and opportunities. In addition, the Executive Board discusses key environmental, social and governance topics on both a regular and ad hoc basis. Here, the focus in the past fiscal year was on actions for the consistent implementation of our climate strategy, the further development of our ambitions to achieve our climate targets, actions to foster environmental protection, and social matters such as occupational safety and health. Governance topics were also the subject of regular reports to the Executive Board, for example, as part of the quarterly compliance report. The Executive Board additionally receives ad hoc reports – but at least once yearly – on the effectiveness review and findings relating to our human rights and environmental due diligence obligations. Further information on the aforementioned topic can be found in the section headed "ESRS S2 Workers in the value chain."

The material sustainability matters identified by the double materiality assessment are elements of our sustainability strategy that has been adopted by the Executive Board, which supports its implementation. In this way, we are seeking to ensure the systematic integration of sustainability matters into the group's corporate strategy and their consideration in key business decisions and transactions. For example, the Executive Board discusses the strategic alignment of the group's investment activities in detail. In the context of short- and medium-term corporate planning, it takes decisions about the investment volume and approves all transactions above a certain size. In this connection, in addition to core aspects such as economic considerations and the analysis of opportunities and risks, the Executive Board also examines sustainability matters and their impacts, risks and opportunities on an ad hoc basis. For example, when deciding on the investment for the construction of a hydrogen-capable direct reduction plant for the production of CO_2-reduced steel, consideration was given to the potential impacts on society and the environment as well as to the financial relevance in connection with greenhouse gas emissions.

The Supervisory Board and its committees receive regular information from the Executive Board on the development and implementation of our sustainability actions. These include the relevant sustainability matters in the corporate strategy, corporate planning and the setting and achievement of targets relating to the sustainability activities that are integrated in the Long-Term Incentive Plan for the Executive Board. This reporting enables the Supervisory Board to exercise its oversight and advisory function in respect of sustainability matters. In the past fiscal year, the reporting covered matters including the results of the double materiality assessment. Moreover, reports were given to the quarterly meetings of the Audit Committee of the Supervisory Board on sustainability matters that specifically concerned the preparation of the first report in accordance with the CSRD. Further information can be found in the "Report by the Supervisory Board."

Like the sustainability strategy, the groupwide risk management system is aligned with the corporate strategy. It helps to safeguard the continued existence of the company and the sustained increase in its value. In order to deal efficiently with risks and opportunities, these must be identified at an early stage, assessed systematically and managed proactively. This requires consideration of both sustainability matters and the impacts of our business activities on non-financial matters. Further information, including risk reporting to the Executive Board and Supervisory Board, can be found in the subsection headed "GOV-5 – Risk management and internal controls over sustainability reporting" in this section and in the "Forecast, opportunity and risk report" in the management report.

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

Further information on Executive Board and Supervisory Board compensation, especially the compensation components that are not described in more detail here, can be found in the separate annual compensation report and the explanations of the compensation systems.

Executive Board compensation

The Executive Board compensation system is an important management element that aims to support successful and sustainable corporate governance; for this reason, the compensation of the Executive Board members is linked to the group's short- and long-term performance. The compensation of the Executive Board members comprises performance-independent and performance-related elements. The total target compensation of the Executive Board consists of fixed compensation, a pension allowance or company pension, fringe benefits, the Short-Term Incentive (STI) target amount and the Long-Term Incentive (LTI) target amount. The latter two elements are primarily performance-related compensation elements; the aim here is to strengthen the performance focus of the compensation system.

In accordance with § 87 (1) of the German Stock Corporation Act (AktG), the Supervisory Board is responsible for Executive Board compensation. Following preparation by the Personnel Committee, it resolves on the compensation system and on the performance criteria and related target values and thresholds in respect of the performance-related and variable compensation components for the Executive Board members where these are not already defined directly by the applicable compensation system. In addition, in accordance with § 120a (1) AktG, the compensation system is submitted for the approval of the Annual General Meeting whenever a significant change is made but at least every four years.

The STI is the short-term variable compensation element; it has a performance period of one year. 70% of the STI amount for the Executive Board members depends on the development of financial performance indicators and 30% on individual performance targets. In principle, the latter may include sustainability matters. However, for fiscal year 2024 / 2025, no targets were defined on the basis of sustainability-related considerations.

The second performance-related compensation element is the Long-Term Incentive (LTI), a share-based element with a performance period of four years. The LTI is issued in annual installments. Before each new installment is issued, the Supervisory Board defines target values and thresholds for the related performance criteria. In addition to financial performance criteria, sustainability targets systematically account for 30% of the LTI. To this end, before each new installment is issued, the Supervisory Board selects one to two specific sustainability targets from a catalog of criteria. These serve as performance criteria that apply for the four-year performance period of the respective installment. They are applied equally to all Executive Board members. When selecting the targets, the Supervisory Board takes account particularly of relevance and the availability of data across the underlying sustainability strategy, which is being refined continuously against the backdrop of thyssenkrupp's transformation.

The current LTI installments include the following sustainability targets for fiscal year 2024 / 2025:

LTI 2021 / 2022 – 2024 / 2025

- Reduce the emissions intensity, calculated on the basis of Scope 1 and Scope 2 emissions at group level (excluding Steel Europe), to 34.5 tons CO_2 equivalent per €1 million sales in fiscal year 2024 / 2025; weighting of 15% within the LTI performance criteria as a whole
- Achieve a production volume of 500,000 tons of net CO_2-reduced steel by the Steel Europe segment in fiscal year 2024 / 2025, verified by an independent external testing organization; weighting of 15% within the LTI performance criteria as a whole

LTI 2022 / 2023 – 2025 / 2026

- Achieve a proportion of 16% women in leadership positions at the end of fiscal year 2024 / 2025; weighting of 15% within the LTI performance criteria as a whole
- Increase the employee Net Promoter Score as an indicator of employee satisfaction to a value of (2) for fiscal year 2024 / 2025; weighting of 15% within the LTI performance criteria as a whole

LTI 2023 / 2024 – 2026 / 2027

- Reduce sustainability risks in our supplier portfolio, measured using thyssenkrupp's own metric of the High Risk Supplier Reduction (HSR), to a value of 53.9% for fiscal year 2024 / 2025; weighting of 30% within the LTI performance criteria as a whole

LTI 2024 / 2025 – 2027 / 2028

- Reduce the accident frequency rate for group employees to a value of 2.1 per one million hours worked in fiscal year 2024 / 2025; weighting of 30% within the LTI performance criteria as a whole

For fiscal year 2024 / 2025, the proportion of compensation based on sustainability-related targets amounted to 18% of the target amount for the variable, performance-related Executive Board compensation.

In principle, climate-related aspects may be considered in both the individual STI performance targets and the LTI sustainability targets if the Supervisory Board defines corresponding climate-related targets for the respective fiscal year. Specifically, this is the case for the aforementioned targets of reducing the emissions intensity and achieving a verified production volume of net CO_2-reduced steel in connection with the LTI installment for 2021 / 2022 to 2024 / 2025 that is due for payment at the end of fiscal year 2024 / 2025; these targets incentivize the reduction in Scope 1 and 2 greenhouse gas emissions. As a result, the proportion of the expense for Executive Board compensation for fiscal year 2024 / 2025 that is associated with climate-related targets amounted to 2%.

Supervisory Board compensation

Under § 14 of the Articles of Association, Supervisory Board members are entitled to an annual basic compensation component and a meeting attendance fee. The amount of compensation awarded to members of the Supervisory Board is based on the member's duties on the Supervisory Board or its committees. In accordance with the provisions of the German Corporate Governance Code, compensation does not include any variable components. Therefore, sustainability- and climate-related aspects are not considered in Supervisory Board compensation.

GOV-4 – Statement on due diligence

The following overview shows how and in which sections of the sustainability report the main aspects and steps of the due diligence process are disclosed.

OVERVIEW OF THE INFORMATION PROVIDED ON THE DUE DILLIGENCE PROCESS

Core elements of due diligence	Sections and subsections in the sustainability report
a) Embedding due diligence in governance, strategy and business model	General information: ESRS 2 GOV-2, ESRS 2 GOV-3, ESRS 2 SBM-1, ESRS 2 SBM-3 + topical ESRS
b) Engaging with affected stakeholders in all key steps of the due diligence	General information: ESRS 2 GOV-2, ESRS 2 SBM-2, ESRS 2 IRO-1 Environmental information: ESRS E1, E2, E3, E5 Social information: ESRS S1, S2, S3 Governance: ESRS G1 The subsections in the topic-related sections disclose measures in accordance with the minimum disclosure requirements MDR-P (ESRS 2).
c) Identifying and assessing adverse impacts	General information: ESRS 2 IRO-1, ESRS 2 SBM-3 + topical ESRS Environmental information: ESRS E1, E2, E3, E5 Social information: ESRS S1, S2, S3 Governance: ESRS G1
d) Taking actions to address those adverse impacts	Environmental information: ESRS E1, E2, E3, E5 Social information: ESRS S1, S2, S3 Governance: ESRS G1 The subsections in the topic-related sections disclose measures in accordance with the minimum disclosure requirements MDR-A (ESRS 2).
e) Tracking the effectiveness of these efforts and communicating	Environmental information: ESRS E1, E2, E3, E5 Social information: ESRS S1, S2, S3 Governance: ESRS G1 The subsections in the topic-related sections disclose measures in accordance with the minimum disclosure requirements MDR-M and MDR-T (ESRS 2).

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

Like all other risks, we consider the risks in connection with sustainability reporting in the established processes of our risk management and internal control systems.

The material sustainability matters in accordance with the ESRS classification are mapped fully in the thyssenkrupp risk catalog and integrated in the groupwide processes of the risk management and internal control systems. The specific content for these two groupwide governance systems will be refined successively.

Risk inventory

In the context of the risk inventory, it has been possible since spring 2025 to assess all sustainability-related risk factors so that all group entities included in the risk inventory are able to record risks in the risk management tool. The process for describing, assessing and prioritizing the risks is the same as the one used for other risks. The risk assessment is based on the net method, which considers all risk management measures that have already been implemented and are effective. We assess all identified risks on the basis of their probability of occurrence and impact – measured by the performance indicators of adjusted EBIT and free cash flow before M&A in the planning period – which enables us to prioritize the reported risks. The risk inventory findings are used in the double materiality assessment, the results of which are examined for their relevance to the risk inventory and discussed with the risk managers.

Control system

Back in 2024, we began systematically integrating the key processes relating to sustainability reporting into our groupwide internal control system. In the reporting year, we developed sample controls for high-risk process steps on the basis of target processes. The specific local controls in the respective group entities can then be documented and tested. Once the sample controls have reached a high level of maturity and cover the respective process almost entirely, it is planned to transfer them to the corresponding groupwide IT application.

Detailed further information on our relevant systems can be found in the “Opportunity and risk report.”

Material risks

In our view, material risks in connection with sustainability reporting are incomplete data or data which do not satisfy quality, plausibility or approval requirements. Process weaknesses may result in the incorrect or late reporting of data or errors in electronic data transfer. Regarding the data recording process for sustainability reporting, we expanded our internal control system to include the corresponding process controls and clear responsibilities for individual process steps in the reporting year. Examples include application of the dual control principle or ensuring the appropriate segregation of duties in the provision of data. If IT systems are involved in the reporting process, we ensure that data transfer is automated where possible.

Responsibilities

For each relevant sustainability reporting subprocess, clear responsibilities (department, person) have been defined in accordance with the GRC model in consultation with the respective specialist departments and the Corporate Function Sustainability. The first line consists of the persons with operational responsibility at all organizational levels for mitigating specific risks and implementing defined controls in the respective subprocess. The corporate functions with specialist responsibility (second line) support the first line if risks are identified or if control deficits are found when implementing risk management actions.

Risk reporting

As we have integrated the sustainability reporting risks into the standard processes of our risk management and internal control systems, the same approach is applied to these risks when it comes to reporting to our committees. At thyssenkrupp, the material corporate risks as defined in the groupwide risk management system are presented each quarter to the interdisciplinary Risk and Internal Control Committee (RICC) headed by the CFO, where they are subjected to plausibility checks. At the same time, the RICC meetings serve to prepare the subsequent risk reporting to the Executive Board and Audit Committee. The RICC meetings are attended by all key officers responsible for governance, risk and compliance in the group. In addition, there is a regular dialog between the Corporate Function Sustainability and the Risk Management department aimed at continuously enhancing collaboration between the disciplines.

Further information on reporting can be found in the “Opportunity and risk report” in the management report.

Strategy

SBM-1 – Strategy, business model and value chain

The thyssenkrupp companies in the five segments offer a broad spectrum of products and services.

- The Automotive Technology segment is a series supplier of chassis and drive components and an assembly and logistics partner to the global automotive industry. Other key products for this customer group are forged components, lightweight car body components, springs and stabilizers, and systems for car body construction and drive and battery assemblies. Automotive Technology also delivers system solutions for the resources, construction and mobility industries.

- The Decarbon Technologies segment provides comprehensive plant engineering solutions for large areas of the chemical and cement industries. As well as delivering turnkey facilities, the segment also provides planning, engineering and maintenance services. In particular, thyssenkrupp nucera delivers the technology for electrolysis plants, including those used for the industrial-scale production of green hydrogen. Other key products are slewing and other bearings and seamless rolled rings for the manufacturers of wind energy installations and for other industrial applications.

- The Materials Services segment supplies raw materials and almost all kinds of materials, customized supply chain solutions and materials-related services such as processing to various customer groups, including the automotive and aerospace industries. The portfolio increasingly includes data-driven digital services for sustainable supply chains.

- The Steel Europe segment produces a broad range of flat carbon steel products with properties tailored to many different applications. It supplies a large number of customer groups, the most important of which is the automotive industry.

- The main products of the Marine Systems segment are submarines and surface vessels, as well as maritime electronics and security technology systems. The primary customer group is the defense area of the public sector.

Detailed information on the segments can be found in the “Fundamental information about the group” section of the management report.

An overview of our employees by region can be found in the section headed “ESRS S1 Own workforce.”

Fossil fuels

thyssenkrupp is active to a small extent in the fossil fuel sector. The Materials Services segment earns revenue from trading in fossil fuels, mainly coal and coke, but this is not the main focus of the segment’s commercial activity. Sales from fossil fuels amounted to around €180 million, which is less than 1% of the group’s total sales.

This figure includes sales of less than €1 million achieved with oil-based products.

In the reporting year, no sales were achieved with taxonomy-aligned economic activities relating to fossil gas.

Sustainability-related targets

Even in a changing and challenging environment, a major goal is to make thyssenkrupp a high-performing and sustainable undertaking. Alongside an economically sustainable competitive position, environmental protection, climate change mitigation and social matters play a key role. Considering the interests of various stakeholder groups is accorded high priority by thyssenkrupp and their requirements in respect of key sustainability matters are determined continuously via various processes. On this basis, we derive targets and actions for improving our sustainability performance.

Our climate targets – The green transformation is a key element of our corporate strategy. It applies to both our own processes and the entire value chain; further information on the green transformation can be found in the "Targets and strategy" subsection in the section headed "Fundamental information about the group" in the management report. This is especially evident in respect of our climate targets: SBTi (Science Based Targets initiative) has assessed our system of medium-term climate objectives (2030) as conforming with the 1.5-degree Celsius target of the Paris Climate Agreement. Our target system includes emissions from our own processes (Scope 1 and 2) and from upstream and downstream activities (Scope 3). Our goal is that thyssenkrupp will reach net zero emissions worldwide by 2050 at the latest – in Germany already by 2045. Further information about the GHG reduction targets can be found in subsection "E1-4" in the section headed "ESRS E1 Climate change."

In the areas of climate, energy and environment, technology and innovations, employees and purchasing, we have defined non-financial targets (NFT) in consultation with the segments, which are responsible for achieving the targets and work with the businesses to drive implementation.

Energy – Energy efficiency plays an important role at thyssenkrupp. For ten years, the global Groupwide Energy Efficiency Program (GEEP) has included measures such as process optimizations, better use of waste heat and the replacement of plant components and lighting systems. We seek to achieve annual energy efficiency gains as a crucial lever in achieving our climate targets.

CO_2 emissions – To reflect our climate targets, we are pressing ahead with reducing the group's CO_2 emissions intensity, calculated as the total of our direct emissions (Scope 1) and emissions from purchased energy (Scope 2) relative to sales (excluding the Steel Europe segment). For the Steel Europe segment, the target value was formulated accordingly for the volume of net CO_2-reduced steel, which is calculated from the reduced carbon input at the Duisburg site and the resulting CO_2 savings, allocated to a production volume.

Technology and innovations – In the course of implementing our innovation strategy, we are driving forward with our research and development (R&D) activities. Our target here is to achieve an adjusted R&D intensity of 3.0% for the group. This figure refers to R&D costs as a proportion of sales, excluding the Materials Services segment.

Employees – Occupational safety and health have always been important issues at thyssenkrupp. In the interest of continuously improving occupational safety, thyssenkrupp monitors accident trends and seeks to steadily reduce the accident frequency rate.

We are also committed to ensuring equal opportunities for all employees and non-discrimination. This is why we have implemented a target for women in management positions. The target is used in accordance with local laws. Further information on this and the aforementioned target can be found in the section headed "ESRS S1 Own workforce."

We use the employee Net Promoter Score (eNPS) as the indicator of employee satisfaction and strive to achieve a continuous improvement. The thyssenkrupp eNPS is part of the annual Employee Pulse Check survey; it indicates the willingness of employees to recommend thyssenkrupp as an employer.

Value chain – Using the HSR metric, we have set the target of achieving an 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. The risk categorization is based on the risk analysis required by the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), which we are required to perform once yearly and on an ad hoc basis if necessary. 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. Moreover, if the risk analysis identifies risks, these must be mitigated as soon as possible by taking prompt action that is consistent with the provisions of the legislation. Further information on performing our risk analysis can be found in the section headed "ESRS S2 Workers in the value chain."

All established targets are pursued in the interest of continuous improvement and are constantly being adjusted and extended in parallel with our ongoing strategic development. Since fiscal year 2020 / 2021, we have been integrating sustainability activities gradually into the Long-Term Incentive (LTI) of the Executive Board and top-level management through the NFTs. Further information on the LTI can be found in the subsection headed "ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes" in this section.

When formulating and defining sustainability-related targets, the requirements of key markets, customer groups, the capital market and other stakeholder groups play an important role.

Assessment of these requirements influences the focus of our business activities and is conducted in the context of our regular dialog with the corresponding stakeholders. In addition to the Annual General Meeting as a platform for dialog, sustainability targets are a key aspect of discussions with customers, investors and rating agencies specialized in sustainability. We submit our sustainability targets in respect of climate change mitigation to the SBTi for assessment.

Our participation in sustainability ratings and the associated external assessment of our sustainability targets and performance represent an important feedback instrument for us and underscore the target-oriented implementation of our sustainability actions.

Sustainability elements of the strategy

The strategy of thyssenkrupp can be described in terms of three key elements: performance, portfolio and the green transformation. Further information on this can be found in the "Targets and strategy" subsection in the section headed "Fundamental information about the group."

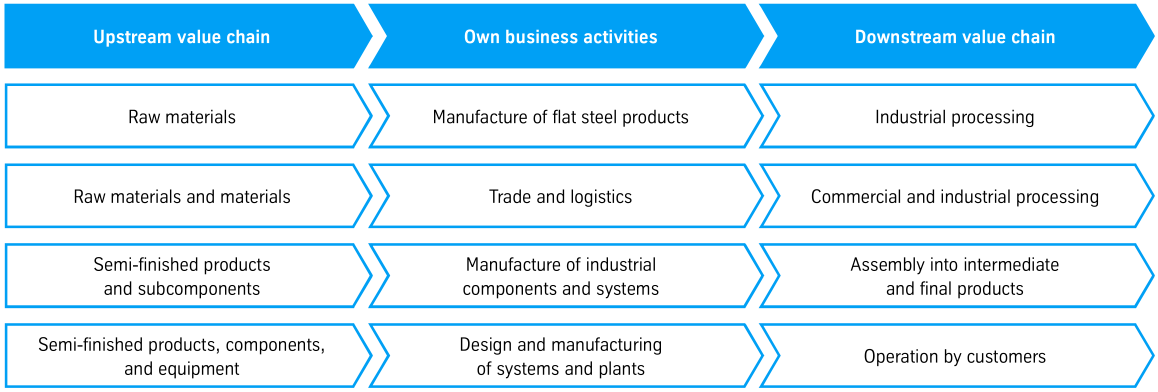
The green transformation is described primarily by the Climate Transition Plan (see subsection "E1-1" in the section headed "ESRS E1 Climate change"), which defines the transformation of both our own processes and those in our upstream and downstream value chain, with clearly specified targets and the actions needed to achieve these targets. We also develop and deliver many innovative solutions that offer our customers support in implementing their own climate- and resource-saving processes and introducing more sustainable products.

Value chain

With a broad portfolio of products and services, we aim to generate added value for our customers, enabling them in turn to create innovative and more sustainable products. To this end, we work with our suppliers, development partners and customers along the value chain.

The following graphic shows the features of the upstream and downstream value chain – the material supplies, the core elements of thyssenkrupp's various business activities and the downstream activities of our customers.

KEY FEATURES OF THE UPSTREAM AND DOWNSTREAM VALUE CHAIN AND OWN BUSINESS ACTIVITIES



In the upstream value chain, we procure raw materials, especially iron ore and coal products, for the manufacture of a broad range of high-quality flat steel products. In addition, we procure all kinds of raw materials and materials (steel, stainless steel, aluminum, plastics and others) for trading and as the basis for extensive supply chain services. For the manufacture of products such as automotive components and plants, we procure metallic and non-metallic materials, semi-finished products, components and equipment.

The individual business units record the purchased goods and services using various enterprise resource planning (ERP) systems. These data are consolidated centrally in thyssenkrupp's Spend Data Warehouse for use in reporting and controlling.

As described in this subsection, we offer our customers a broad range of high-quality materials and technical products, solutions and services. In addition to delivering direct benefits for our customers, we generate sustainable value for our investors. We also seek to create modern and future-proof jobs in all regions and at all our sites. Further information on our stakeholders' interests can be found in the following subsection.

SBM-2 – Interests and views of stakeholders

The continuous dialog with stakeholders supports our responsible and forward-looking corporate governance and is a key element of thyssenkrupp's sustainability strategy. We foster an open dialog with our stakeholders as a way of taking account of their expectations, concerns and suggestions – especially in respect of environmental and social matters – in our strategic and business decision-making.

In order to gain a better understanding of our stakeholders' expectations and perspectives and foster a purposeful dialog, we record their opinions regularly at various levels using a range of communication channels – here are a few examples:

Employees – As thyssenkrupp's most important internal stakeholder group, the company's employees are provided with transparent information on relevant topics, for example, at regular information events, via our "WeNet" company intranet and through targeted training. We foster a continuous and active dialog and request specific feedback via employee review meetings, pulse checks and dialog formats such as "klar:text." In addition, our whistleblower system gives them the opportunity to report potential grievances in confidence, thus contributing to the integrity of our activities.

Customers – Our customers have clear expectations regarding the quality, level of innovation and sustainability of our products. They are the focus of our activities. We maintain a close dialog with them, especially through in-person discussions with our sales and marketing team.

Suppliers and business partners – As contributors in the value chain, our suppliers and business partners are responsible for complying with social and environmental standards. We maintain a close dialog with our suppliers and business partners by way of regular discussions with the internal teams responsible for our purchasing processes and through supplier audits. Any suspicions concerning human rights violations by our suppliers and business partners can be reported via our whistleblower system, which is open to use by all thyssenkrupp employees, as well as by external stakeholders and other third parties.

Capital and financial market participants, analysts and rating agencies – The growing interest of our investors and analysts in ESG criteria and sustainable value creation is reflected in our continuous and transparent dialog with these stakeholders. Forums for this include capital market events such as investor conferences, roadshows and capital markets days, our Annual General Meeting and our annual and quarterly reports. We also provide information in the investor relations section of our website (www.thyssenkrupp.com/en/investors). Through our active participation in ESG ratings, which are also relevant for investors and analysts, we underscore our commitment to transparency and provide guidance for our stakeholders.

Policy makers, legislation and authorities – We maintain a regular dialog with policy makers, ministries and authorities so that we can give early consideration to relevant developments and provide transparency about actions planned by thyssenkrupp.

Trade unions – We consider trade unions to be important partners in the social dialog. We foster trustful and constructive cooperation with the employee representatives, involving them at an early stage in relevant decision-making processes. Regular discussions at site and group level help us to ensure fair working conditions and jointly develop solutions to current challenges.

Non-governmental organizations, industry associations, academia, research and development, media – We maintain a topical dialog with this stakeholder group, which functions as an observer of and driving force for sustainable development and as a source of innovation and research. We cultivate collaborations with scientific institutions and educational stakeholders, participate in specialist events and contribute to industry associations and initiatives with the goal of jointly advancing social and technological developments. The media have the role of ensuring the transparency of undertakings' sustainability strategies and asking critical questions, thus creating publicity and fostering debate.

Civil society and local communities, vulnerable groups – Targeted and ad hoc dialog facilitates an open exchange of views. In the case of planned investments, for example, we address stakeholders at an early stage, clarify respective interests and foster transparency. Moreover, we provide information via press releases, thereby building trust and facilitating participation within the meaning of our ESG responsibility and our governance principles. Some of our stakeholder groups may be particularly vulnerable. This may be the case if, for example, they have a limited ability to express their interests and needs. Our accessible whistleblower system enables these stakeholders to contact us as well.

Nature – We consider nature to be a silent but crucial stakeholder whose interests are represented by non-governmental organizations, local communities, legislators, and nature and environmental protection organizations. The dialog with these stakeholders enables us to identify environmental impacts and act responsibly in the interests of nature.

We systematically involve the relevant internal representatives of stakeholder groups in the central process steps of our double materiality assessment, such as the identification and assessment of impacts, risks and opportunities. Further details of the materiality assessment process can be found in the subsection headed "IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities" in this section.

We consider those groups that might be affected by the impacts of our operations or business relationships to be the relevant stakeholders in respect of the materiality assessment. In their day-to-day work, the internal representatives of these groups are in regular dialog with internal and external stakeholders and contribute their perspectives to our assessment processes. Outside the double materiality assessment process, a structured dialog with our stakeholders takes place via the respective specialist departments and expert groups. For this purpose, we use a number of established communication channels (see list above). The open and regular dialog with our local, national and global stakeholders enables us to better comprehend different expectations and viewpoints. It can serve as the basis for mutual understanding and social acceptance of our business decisions, at the same time delivering valuable impetus for the continuous further development of our sustainability strategy. In order to identify material sustainability matters, we analyze the expectations, interests and requirements of our stakeholders on a continuous basis. The insights obtained in this way are used in our double materiality assessment, our sustainability agenda, the management system for human rights due diligence and our groupwide opportunities and risk management system.

To enable us to comply with new framework conditions and relevant sustainability requirements, we adjust our processes to involve stakeholders as and when necessary. In fiscal year 2024 / 2025, no fundamental changes were made to our strategy or business model as the result of feedback from our stakeholders.

As part of the presentation of our double materiality assessment, the Supervisory Board and Executive Board were informed about the viewpoints and interests of the affected stakeholders, among other things. The Executive Board member responsible for the respective directorate is also notified about the stakeholders affected by sustainability-related matters.

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

As an international corporation, thyssenkrupp develops technologies and solutions for future market and customer needs. In fiscal year 2024 / 2025, we performed a double materiality assessment to identify and assess the actual and potential negative and positive impacts of our business activities on society and the environment and the economic relevance of sustainability matters for thyssenkrupp.

Double materiality assessment – method and results

Our value chain covers the global procurement of raw materials, goods and services, the manufacture of and trade in products, and the marketing of our products, solutions and services. This results in material impacts, risks and opportunities from our own business activities and along the upstream and downstream value chain. The material impacts identified are mainly caused by or closely related to thyssenkrupp's business strategy and business model. In the double materiality assessment, we systematically assessed the impacts, risks and opportunities identified. These assessments, including a tabular overview of the material impacts, risks and opportunities, can be found in the respective topical sections.

We continuously analyze our business activities in respect of their material impacts, risks and opportunities. In so doing, we seek to minimize negative impacts, amplify positive impacts, reduce risks and leverage opportunities. We take care to include material impacts, risks and opportunities – together with their current and potential future relevance – into our strategic considerations. Potential connections with our business model and value chain are also included in our decision-making processes. The material impacts, risks and opportunities in connection with our own operations and with the operations in our value chain and their impacts on our business model, value chain, strategy and decision-making are explained in the respective topical sections.

In the 2024 / 2025 reporting year, no sustainability matters other than those envisaged by the ESRS were identified. Due to our extensive portfolio of innovative technologies, products and services, there are no significant concentrations of potential negative or positive impacts, risks and opportunities in either our business model or in the value chain. Moreover, in the current reporting year, there are currently no significant financial effects of the material risks and opportunities on our financial position and profit or loss, nor have the impacts, risks and opportunities identified and the actions initiated or planned resulted in any change to the corporate strategy or business model.

Further information on the double materiality assessment can be found in subsection “IRO-1” in this section.

Resilience of the strategy and business model

In the future, to support the qualitative and quantitative analysis of the resilience of the strategy and business model in respect of the material impacts, risks and opportunities, thyssenkrupp will identify long-term risks in an annual double materiality assessment, assess these in qualitative and quantitative terms and have them reviewed by selected experts.

Social and environmental risks are also included in this assessment. They undergo holistic analysis and their assessment takes account of the environment in which thyssenkrupp operates. thyssenkrupp defines risks as future events or developments that may result in negative deviations from our forecasts or other targets. Dealing responsibly with risks is part of corporate governance at thyssenkrupp, because the continuous and systematic management of business risks – but also opportunities – is fundamental to targeted governance. Further information about the key features of our risk management and control system can be found in the “Opportunity and risk report” in the management report.

We continuously monitor the resilience of the strategy and business model as well the company’s ability to deal with current and future material impacts and risks and leverage the opportunities identified. The assessment includes the climate and biodiversity analyses described in subsections “SBM-3 E1” and “E4-1.” We also monitor any changes in the market environment or caused by new risks and take suitable action to address them if necessary.

The analysis of the resilience of the strategy and business model takes account of the fact that sustainability has been an integral element of our corporate strategy for many years and that thyssenkrupp reports regularly on its sustainability activities. The assessment of our medium- and long-term targets by independent ESG rating agencies not only delivers an objective estimation but also serves as an external benchmark for our sustainability performance. We continuously monitor any changes and new developments in the sustainability context, responding strategically and flexibly to any changes and taking account of our stakeholders’ expectations. In the context of our strategic alignment, we examine our resilience to external influences, also in light of sustainable development aspects. The assessment and integration of social, environmental and strategic risks and opportunities show that thyssenkrupp has a robust and adaptable business model that is focused in the long term on sustainable development and resilience to external influences.

Impact, risk and opportunity management

IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities

This sustainability report is based on the double materiality assessment in accordance with ESRS requirements. Through this materiality assessment, we identify those sustainability topics that are most significant for our company and our stakeholders. As part of this assessment, we consider both the impacts of our operations on the environment and society (inside-out perspective) and the financial risks and opportunities caused by external influences on our business model (outside-in perspective). In this report, we discuss all topics that we have classified as material on the basis of one or both perspectives.

To identify the material sustainability topics for thyssenkrupp, we have performed a multistage assessment process, which is described below and is based on ESRS requirements. An expert team from Corporate Function Sustainability was responsible for execution and coordination.

Definition of the scope and stakeholders

The first step in the double materiality assessment was to systematically define the scope of consolidation used in financial reporting and the upstream and downstream value chain in accordance with ESRS requirements. This enabled us to be certain that the assessment covered all relevant business activities and countries, as well as our products and services. Further information on the definition of the scope of consolidation and the value chain can be found in the subsection headed “BP-1 – General basis for preparation of the sustainability report” earlier in this section. We also consulted internal information and documents such as thyssenkrupp’s annual report for the previous fiscal year, our environmental data reports, the findings of supply chain assessments, ESG benchmarking studies and our risk inventory as sources for identifying potentially material topics. In addition, we took guidance from sustainability reporting standards such as those issued by the Global Reporting Initiative (GRI), Sustainability Accounting Standards Board (SASB) and International Sustainability Standards Board (ISSB), the Sustainable Development Goals (SDGs) and the ESG ratings that are relevant for thyssenkrupp.

We then identified the material stakeholder groups for thyssenkrupp’s operations (further information can be found in the subsection headed “SBM-2 Interests and views of stakeholders” in this section). Their interests and views were considered solely by consulting internal representatives and actively involving them in the subsequent process. These are ESG specialists at group and segment level who, on the basis of their expertise and extensive dialog with the stakeholders in the course of their work for their organizational units, can take a substantiated and differentiated approach to representing the respective stakeholder’s perspectives.

Identification of impacts, risks and opportunities

In the next step, a topic list was compiled from the aforementioned information sources. This list covers all sustainability matters that must be included in the double materiality assessment in accordance with ESRS requirements, especially ESRS 2 Appendix A. The goal is to systematically identify the impacts, risks and opportunities of our operations and assess these during the subsequent process.

The expert team responsible for project management identified and defined the relevant topics and the potential impacts, risks and opportunities derived on this basis. The topic list was then discussed with the representatives of the key stakeholder groups and validated. In this way, we aimed to ensure that our extensive internal expertise was involved, the topic list was complete and the impacts, risks and opportunities derived from the list were presented consistently.

We divided the impacts, risks and opportunities into two categories: on/for society and on/for the environment. In doing so, we considered both our own operations and those in the upstream and downstream value chain, as well as the short-, medium- and long-term time horizons. We additionally considered whether the impacts and dependencies identified might trigger financial risks. A distinction was also made between positive or negative, actual or potential impacts. The assessment was based on a gross approach that did not include any assessment of company-specific

mitigation or control measures. The inherent elements of the operational status quo may be included in the gross approach if they are inevitably associated with regulatory or industry-wide requirements.

Also included were findings from the groupwide process on compliance with human rights and environmental due diligence obligations (further information on this process can be found in the section headed "ESRS S2 Workers in the value chain"). These were used mainly to assess existing risks in the value chain and substantiate the relevance of the corresponding topics for the materiality assessment.

We identified the impacts, risks and opportunities for the group as a whole. Where there were significant differences between the impacts, risks and opportunities for individual segments, the corresponding topics were considered on a disaggregated basis to ensure transparent and differentiated assessment later in the process. Following assessment, we used a sales-based aggregation threshold – which we defined as 40% – to determine materiality at the group or segment level. This was aimed at ensuring that segment-specific topics were identified, assessed and reported appropriately.

Assessment of impacts, risks and opportunities

A standardized groupwide assessment methodology was defined for assessing potential impacts, risks and opportunities. The assessment of the impacts was aligned with the dimensions defined in ESRS 1. In assessing the positive impacts, the scale and scope were considered; the irremediable character was additionally included for negative impacts. Impacts were also assessed in terms of the probability of their occurrence.

A positive or negative impact at group level is classified as actual if at least one specific case – an incident or confirmed event – is known to have occurred. If there has been no confirmed case, the impact is classified as potential. In the assessment, we also focused particularly on the potential negative impacts on human rights and weighted the severity of an impact primarily against the probability of its occurrence.

The risks and opportunities were assessed in terms of their potential financial scale and the probability of their occurrence and categorized by type. In the course of analyzing the impacts, risks and opportunities, each assessment dimension was systematically ranked on a scale of 1 to 4, which in turn was underpinned by a definition.

To ensure a common understanding of the assessment process and methodology, we prepared a structured assessment guideline that was provided to all those involved in the project and explained in detail at a number of information events.

The ESG specialists at group and segment level represented the relevant stakeholder groups and adopted their views in the course of the assessment process. Their materiality assessment was based on, for example, sustainability strategies, project-specific insights and collaboration with stakeholders such as municipal administrations. As well as their specialist expertise, they also contributed their deep understanding of the organizational structures and regional requirements that influence our groupwide activities.

Aggregation and validation of materiality assessments

After concluding the identification and assessment of the impacts, risks and opportunities, the findings were consolidated to determine the double materiality of the sustainability topics. Here, we consolidated the findings of the preceding steps in the assessment. A threshold was defined for classifying the topics within the sustainability matrix. This laid the foundation for transparent and comprehensible decisions on the inclusion or exclusion of the topics. In defining the threshold, we examined the distribution of the assessed impacts, risks and opportunities across the scale and defined the materiality threshold as seven. The threshold was calculated on the basis of the aggregated assessments produced using the four-stage scale. It was considered appropriate because it is below the mean of the maximum possible value of 16 and thus enables objective differentiation between material and non-material aspects. For the sustainability reporting, the impacts, risks and opportunities identified as material were then allocated to the corresponding topic clusters and relevant ESRS disclosure requirements. As soon as a single impact, risk or opportunity was assessed as material, the corresponding topic was defined as material.

To ensure the quality and transparency of the double materiality assessment, clear decision-making processes and internal control mechanisms were introduced. These measures are aimed at ensuring that the identified impacts, risks and opportunities are presented fully and accurately in the sustainability report. In addition, the findings of the assessment were discussed and validated with the stakeholder representatives.

The final results of the double materiality assessment and the resulting reporting obligations were then presented to the Executive Board for its approval. Via the regular meetings of the Audit Committee, the Supervisory Board was involved in the sustainability reporting in accordance with the CSRD and the findings of the double materiality assessment.

In the context of the double materiality assessment, it was ensured that the definition of the thresholds for financial materiality in the underlying risk methodology is aligned with the assessment standards established in the risk management system and that it was therefore possible to include CSRD-relevant risks as a matter of course in the company's regular risk management process. In order to include CSRD-relevant risks in the regular risk management process, we expanded our risk catalog for the first risk inventory performed in this reporting year to include the topical ESRS requirements that were already applied in the double materiality assessment. The results of the materiality assessment are examined for their relevance to the risk inventory and are discussed with the risk managers. The risk managers for the businesses record or update the results in the context of the regular risk inventory, taking account of any control measures that have already been implemented. In this way, we aim to ensure a consistent and standardized groupwide risk management process. The refinement of our processes is a central element of our improvement strategy.

The double materiality assessment described above was already performed for the first time in fiscal year 2023 / 2024. For the reporting year, we again reviewed the findings in consultation with the internal stakeholder group representatives and obtained confirmation of their validity from the Executive Board of thyssenkrupp AG. Future reviews and refinements of the assessment process are planned in the context of annual reporting. In particular, it will be examined whether methodological changes, new regulatory requirements or changes to company-specific framework conditions necessitate a review of the materiality assessment. As this year's report represents the first time that thyssenkrupp has applied CSRD requirements, we are also unable to document any changes compared with previous reporting periods.

ESRS 2 IRO-1 E1 – Analysis of climate-related impacts, risks and opportunities

In order to identify and assess actual and potential impacts, risks and opportunities in connection with climate change, thyssenkrupp applied the LEAP (locate, evaluate, assess, prepare) approach as part of the materiality assessment. This structured process covers four phases: the localization of interfaces to nature within the company's own operations and along the upstream and downstream value chain; the assessment of relevant dependencies and impacts; the estimation of material risks and opportunities; and reporting of the findings.

In the first phase, the following topic areas were assessed: climate change adaptation, climate change mitigation and energy. The assessment was performed at the aggregated level.

The methods, assumptions and tools we used to identify and assess impacts, risks and opportunities are aligned with the process disclosed in subsection "ESRS 2 IRO-1." As a result, the topics of climate change adaptation, climate change mitigation and energy were classified groupwide as material. This assessment was confirmed by scenario analyses of transition and physical climate risks. The transition analysis is based on a company-specific combined net-zero 2050 scenario (IEA, IPCC, EU 1.5TECH) and delivers a qualitative assessment of potential political, technological and economic transition events along the value chain in respect of the probability of their occurrence and level of impact. The physical analysis is based on climate projections from the CMIP6 model set, taking account of various emission and development pathways (including SSP5-8.5) and combining site-specific vulnerability and risk indicators in order to assess the acute and chronic climate risks to thyssenkrupp's own operations for different time horizons. Further information can be found in the section headed "ESRS E1 Climate change." In the course of the double materiality analysis assessment, analysis of the environmental data recorded showed that topic area ESRS E1-7 must be classified as not material. This was based primarily on the lack of reportable activities relating to the removal of greenhouse gases and to the negligible scope of carbon credit retirement.

ESRS 2 IRO-1 E2 – Analysis of pollution-related impacts, risks and opportunities

As part of the materiality assessment, thyssenkrupp applied a structured LEAP approach in order to systematically identify and assess actual and potential pollution-related impacts, risks and opportunities. This structured process covers four phases: the localization of interfaces to nature within the company's own operations and along the upstream and downstream value chain; the assessment of relevant dependencies and impacts; the estimation of material risks and opportunities; and reporting of the findings.

In the first phase, the following topic areas were assessed: emissions to the air, water and soil, microplastics, substances of concern and dependencies of ecosystem services that aid the mitigation of pollution-related impacts. The assessment was performed on a disaggregated basis for all topic areas except emissions to the air.

The methods, assumptions and tools we used to identify and assess impacts, risks and opportunities are aligned with the process disclosed in subsection "ESRS 2 IRO-1." As a result, the emissions to the air and soil were classified groupwide as material. Emissions to water were identified as material only for the Steel Europe segment. Further information can be found in the section headed "ESRS E2 Pollution."

ESRS 2 IRO-1 E3 – Analysis of water and marine resources-related impacts, risks and opportunities

thyssenkrupp applied a structured LEAP approach in order to systematically identify and assess actual and potential water and marine resources-related impacts, risks and opportunities. This approach covers four phases: the localization of interfaces to nature within the company's own operations and along the upstream and downstream value chain; the assessment of dependencies and impacts, especially in respect of pollution, withdrawals and use; the estimation of potential financial and environmental risks and opportunities; and reporting of the findings.

In the first phase, the following topic areas were assessed: water consumption and withdrawals, water discharge, water discharge into oceans and the extraction and use of marine resources, including the associated economic activities. It was performed on a disaggregated basis for all topics except marine resources.

The analysis showed that the impacts and risks in connection with water withdrawals and consumption must be classified as material for thyssenkrupp. The topic of water discharge was identified as material only for Steel Europe.

ESRS 2 IRO-1 E4 – Analysis of biodiversity and ecosystem-related impacts, risks and opportunities

As part of the materiality assessment, thyssenkrupp also applied a structured LEAP approach here in order to systematically identify and assess actual and potential biodiversity and ecosystem-related impacts, risks and opportunities. This approach covers four phases: the localization of interfaces to nature within the company's own operations and along the upstream and downstream value chain; the assessment of biodiversity-related dependencies and impacts; the estimation of material risks and opportunities; and reporting of the findings.

In the first phase, the following topic areas were assessed: the contribution to drivers of biodiversity loss, their impacts on the state of species and condition of ecosystems, and the impacts and dependencies of ecosystem services. The assessment was performed primarily on an aggregated basis. The analysis showed that the impacts, risks and opportunities in connection with biodiversity must be classified as not material for thyssenkrupp AG. For the company's own operations, this analysis was confirmed by a supplementary site-related biodiversity analysis: Using a geodata-based tool, the company's sites were investigated for possible dependencies of ecosystem services (e.g., pollination, water purification, the provision of habitats) and for potential impacts on biodiversity. The assessment was based on global criteria such as the Biodiversity Intactness Index, water stress, soil quality, land use, functional connectivity and pollination potential. It also considered systemic risks such as the potential detriment to endangered species and the cumulative impact on biodiversity-sensitive areas. The analysis showed that only a few sites were in or close to such areas and just a small number of these were classified as potentially relevant on the basis of the indicators. This estimation of relevance took account of both local environmental conditions and the economic activities performed at each site. However, it does not establish the existence of any actual detriments. Overall, the analysis did not indicate any material biodiversity-related dependencies or impacts.

ESRS 2 IRO-1 E5 – Analysis of material resource use and circular economy-related impacts, risks and opportunities

As part of the materiality assessment, thyssenkrupp performed a structured analysis based on the LEAP approach with the goal of identifying and assessing actual and potential impacts, risks and opportunities relating to resource use and circular economy. This process covers the localization of interfaces to nature within our own operations and along the upstream and downstream value chain; the assessment of dependencies and impacts; the estimation of material risks and opportunities; and reporting of the findings.

The assessment focused on three key topic areas: resources inflows, including resource use, especially in respect of the circularity of the materials used, resource use optimization and differentiation between renewable and non-renewable resources; resource outflows resulting from the manufacture and sale of products and the provision of services; waste, including the treatment of hazardous and non-hazardous waste. The assessment was performed on a disaggregated basis for all topic areas.

The analysis also took account of a large number of aspects, including the businesses associated with resource use, the material impacts and risks of an unchanged business model, the opportunities in connection with a circular economic system and the stages of the value chain with a particular concentration of resource use and negative impacts. The analysis showed that there were material impacts and opportunities for thyssenkrupp AG in connection with resource use, circular economy and waste.

IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability report

The following index lists all the ESRS disclosure requirements we considered in preparing the sustainability report on the basis of the findings of the double materiality assessment. Using this table, the information relating to the respective ESRS disclosure requirements can be located in the report.

SUSTAINABILITY REPORT INDEX

Disclosure requirement	Title of the disclosure requirement	Subsection in the sustainability report
ESRS 2 General disclosures		
BP-1	General basis for preparation of sustainability statements	Basis for preparation – General basis for preparation of the sustainability report
BP-2	Disclosures in relation to specific circumstances	Basis for preparation – Disclosures in relation to specific circumstances
GOV-1	The role of the administrative, management and supervisory bodies	Governance – The role of the administrative, management and supervisory bodies
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Governance – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
GOV-3	Integration of sustainability-related performance in incentive schemes	Governance – Integration of sustainability-related performance in incentive schemes
GOV-4	Statement on due diligence	Governance – Statement on due diligence
GOV-5	Risk management and internal controls over sustainability reporting	Governance – Risk management and internal controls over sustainability reporting
SBM-1	Strategy, business model and value chain	Strategy – Strategy, business model and value chain
SBM-2	Interests and views of stakeholders	Strategy – Interests and views of stakeholders
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model Use of the phase-in option for ESRS 2 SBM-3 para. 48e
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	Impact, risk and opportunity management – Description of the process to identify and assess material impacts, risks and opportunities
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	Impact, risk and opportunity management – Disclosure requirements in ESRS covered by the company's sustainability report
ESRS E1 Climate change		
ESRS 2 GOV-3 E1	Integration of sustainability-related performance in incentive schemes	ESRS 2: Governance – Integration of sustainability-related performance in incentive schemes
E1-1	Transition plan for climate change mitigation	Strategy – Transition plan for climate change mitigation
ESRS 2 SBM-3 E1	Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS E1: Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model Use of the phase-in option for ESRS 2 SBM-3 para. 48e
ESRS 2 IRO-1 E1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	ESRS 2: Impact, risk and opportunity management – Analysis of climate-related impacts, risks and opportunities
E1-2	Policies related to climate change mitigation and adaptation	Impact, risk and opportunity management – Policies related to climate change mitigation and adaptation
E1-3	Actions and resources in relation to climate change policies	Impact, risk and opportunity management – Actions and resources in relation to climate change policies
E1-4	Targets related to climate change mitigation and adaptation	Metrics and targets – Targets related to climate change mitigation and adaptation

SUSTAINABILITY REPORT INDEX

Disclosure requirement	Title of the disclosure requirement	Subsection in the sustainability report
E1-5	Energy consumption and mix	Metrics and targets – Energy consumption and mix
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	Metrics and targets – Gross Scopes 1, 2, 3 and Total GHG emissions
E1-8	Internal carbon pricing	Metrics and targets – Internal carbon pricing
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Use of the phase-in option
ESRS E2 Pollution		
ESRS 2 SBM-3 E2	Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS E2: Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model Use of the phase-in option for ESRS 2 SBM-3 para. 48e
ESRS 2 IRO-1 E2	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	ESRS 2: Impact, risk and opportunity management – Analysis of pollution-related impacts, risks and opportunities
E2-1	Policies related to pollution	Impact, risk and opportunity management – Policies related to pollution
E2-2	Actions and resources related to pollution	Impact, risk and opportunity management – Actions and resources related to pollution
E2-3	Targets related to pollution	Metrics and targets – Targets related to pollution
E2-4	Pollution of air, water and soil	Metrics and targets – Pollution of air, water and soil
E2-6	Anticipated financial effects from pollution-related risks and opportunities	Metrics and targets – Anticipated financial effects from pollution-related risks and opportunities Use of the phase-in option for ESRS E2-6 paras. 39a, 39b, 40a, 40c, 41
ESRS E3 Water and marine resources		
ESRS 2 SBM-3 E3	Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS E3: Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model Use of the phase-in option for ESRS 2 SBM-3 para. 48e
ESRS 2 IRO-1 E3	Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	ESRS 2: Impact, risk and opportunity management – Analysis of material water and marine resources-related impacts, risks and opportunities
E3-1	Policies related to water and marine resources	Impact, risk and opportunity management – Policies related to water and marine resources
E3-2	Actions and resources related to water and marine resources	Impact, risk and opportunity management – Actions and resources in relation to water and marine resources
E3-3	Targets related to water and marine resources	Metrics and targets – Targets related to water and marine resources
E3-4	Water consumption	Metrics and targets – Water consumption
E3-5	Anticipated financial effects from water and marine resources-related risks and opportunities	Use of the phase-in option
ESRS E5 Resource use and circular economy		
ESRS 2 SBM-3 E5	Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS E5: Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model Use of the phase-in option for ESRS 2 SBM-3 para. 48e
ESRS 2 IRO-1 E5	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	ESRS 2: Impact, risk and opportunity management – Analysis of material resource use and circular economy-related impacts, risks and opportunities

SUSTAINABILITY REPORT INDEX

Disclosure requirement	Title of the disclosure requirement	Subsection in the sustainability report
E5-1	Policies related to resource use and circular economy	Impact, risk and opportunity management – Policies related to resource use and circular economy
E5-2	Actions and resources related to resource use and circular economy	Impact, risk and opportunity management – Actions and resources related to resource use and circular economy
E5-3	Targets related to resource use and circular economy	Metrics and targets – Targets related to resource use and circular economy
E5-4	Resource inflows	Metrics and targets – Resource inflows
E5-5	Resource outflows	Metrics and targets – Resource outflows
E5-6	Anticipated financial effects from resource use and circular economy-related risks and opportunities	Use of the phase-in option
ESRS S1 Own workforce		
ESRS 2 SBM-2 S1	Interests and views of stakeholders	ESRS 2: Strategy – Interests and views of stakeholders
ESRS 2 SBM-3 S1	Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS S1: Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model Use of the phase-in option for ESRS 2 SBM-3 para. 48e
S1-1	Policies related to own workforce	Impact, risk and opportunity management – Policies related to own workforce
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	Impact, risk and opportunity management – Processes for engaging with own workforce and workers' representatives about impacts
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	Impact, risk and opportunity management – Processes to remediate negative impacts and channels for own workforce to raise concerns
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Impact, risk and opportunity management – Taking action on material impacts, risks and opportunities related to own workforce and the effectiveness of those actions
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Metrics and targets – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
S1-6	Characteristics of the undertaking's employees	Metrics and targets – Characteristics of the undertaking's employees
S1-7	Characteristics of non-employees in the undertaking's own workforce	Use of the phase-in option
S1-8	Collective bargaining coverage and social dialogue	Metrics and targets – Collective bargaining coverage and social dialog Use of the phase-in option in countries outside the European Economic Area (EEA)
S1-9	Diversity metrics	Metrics and targets – Diversity metrics
S1-10	Adequate wages	Metrics and targets – Adequate wages
S1-12	Persons with disabilities	Use of the phase-in option
S1-13	Training and skills development metrics	Use of the phase-in option
S1-14	Health and safety metrics	Metrics and targets – Health and safety metrics Use of the phase-in option for non-employee workers, work-related ill health and number of days lost
S1-16	Remuneration metrics (pay gap and total remuneration)	Metrics and targets – Remuneration metrics (pay gap and total remuneration)
S1-17	Incidents, complaints and severe human rights impacts	Metrics and targets – Incidents, complaints and severe human rights impacts

SUSTAINABILITY REPORT INDEX

Disclosure requirement	Title of the disclosure requirement	Subsection in the sustainability report
ESRS S2 Workers in the value chain		
ESRS 2 SBM-2 S2	Interests and views of stakeholders	ESRS 2: Strategy – Interests and views of stakeholders
ESRS 2 SBM-3 S2	Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS S2: Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model Use of the phase-in option for ESRS 2 SBM-3 para. 48e
S2-1	Policies related to value chain workers	Impact, risk and opportunity management – Policies related to value chain workers
S2-2	Processes for engaging with value chain workers about impacts	Impact, risk and opportunity management – Processes for engaging with value chain workers about impacts
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	Impact, risk and opportunity management – Processes to remediate negative impacts and channels for value chain workers to raise concerns
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	Impact, risk and opportunity management – Taking action on material impacts, risks and opportunities related to value chain workers and the effectiveness of those actions
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Metrics and targets – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
ESRS S3 Affected communities		
ESRS 2 SBM-2 S3	Interests and views of stakeholders	ESRS 2: Strategy – Interests and views of stakeholders
ESRS 2 SBM-3 S3	Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS S3: Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model Use of the phase-in option for ESRS 2 SBM-3 para. 48e
S3-1	Policies related to affected communities	Impact, risk and opportunity management – Policies related to affected communities
S3-2	Processes for engaging with affected communities about impacts	Impact, risk and opportunity management – Processes for engaging with affected communities about impacts
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Impact, risk and opportunity management – Processes to remediate negative impacts and channels for affected communities to raise concerns
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Impact, risk and opportunity management – Taking action on material impacts, risks and opportunities related to affected communities and the effectiveness of those actions
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Metrics and targets – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
ESRS G1 Business conduct		
ESRS 2 GOV-1 G1	The role of the administrative, management and supervisory bodies	ESRS 2: Governance – The role of the administrative, management and supervisory bodies
ESRS 2 SBM-3 G1	Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS G1: Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model Use of the phase-in option for ESRS 2 SBM-3 para. 48e

SUSTAINABILITY REPORT INDEX

Disclosure requirement	Title of the disclosure requirement	Subsection in the sustainability report
ESRS 2 IRO-1 G1	Description of the processes to identify and assess material impacts, risks and opportunities	ESRS 2: Impact, risk and opportunity management – Description of the processes to identify and assess material impacts, risks and opportunities
G1-1	Business conduct policies and corporate culture	Impact, risk and opportunity management – Business conduct policies and corporate culture
G1-2	Management of relationships with suppliers	Impact, risk and opportunity management – Management of relationships with suppliers
G1-3	Prevention and detection of corruption and bribery	Impact, risk and opportunity management – Prevention and detection of corruption and bribery
G1-4	Incidents of corruption or bribery	Metrics and targets – Incidents of corruption or bribery
G1-5	Political influence and lobbying activities	Metrics and targets – Political influence and lobbying activities
G1-6	Payment practices	Metrics and targets – Payment practices

The following table lists all datapoints that derive from other EU legislation in accordance with ESRS 2 Appendix B. It shows where these datapoints can be found in our sustainability report, which were classified as “not material” or “not relevant” and for which the phase-in option is being applied.

LIST OF DATAPOINTS IN CROSS-CUTTING AND TOPICAL STANDARDS THAT DERIVE FROM OTHER EU LEGISLATION (ESRS 2 APPENDIX B)

Disclosure Requirement and related datapoint	(1) SFDR reference	(2) Pillar 3 reference	(3) Benchmark Regulation reference	(4) EU Climate Law reference	Subsection in the sustainability report
ESRS 2 GOV-1 Board’s gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		Governance – Role of the administrative, management and supervisory bodies
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		Governance – Role of the administrative, management and supervisory bodies
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				Governance – Statement on due diligence
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Strategy – Strategy, business model and value chain

LIST OF DATAPOINTS IN CROSS-CUTTING AND TOPICAL STANDARDS THAT DERIVE FROM OTHER EU LEGISLATION (ESRS 2 APPENDIX B)

Disclosure Requirement and related datapoint	(1) SFDR reference	(2) Pillar 3 reference	(3) Benchmark Regulation reference	(4) EU Climate Law reference	Subsection in the sustainability report
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Non-relevant datapoint
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Non-relevant datapoint
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Non-relevant datapoint
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	Strategy – Transition plan for climate change mitigation
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2		Strategy – Transition plan for climate change mitigation
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		Metrics and targets – Targets related to climate change mitigation and adaptation
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				Metrics and targets – Energy consumption and mix
ESRS E1-5 Energy consumption and mix paragraph 37 ESRS	Indicator number 5 Table #1 of Annex 1				Metrics and targets – Energy consumption and mix
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43 ESRS	Indicator number 6 Table #1 of Annex 1				Metrics and targets – Energy consumption and mix

LIST OF DATAPOINTS IN CROSS-CUTTING AND TOPICAL STANDARDS THAT DERIVE FROM OTHER EU LEGISLATION (ESRS 2 APPENDIX B)

Disclosure Requirement and related datapoint	(1) SFDR reference	(2) Pillar 3 reference	(3) Benchmark Regulation reference	(4) EU Climate Law reference	Subsection in the sustainability report
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		Metrics and targets – Gross Scopes 1, 2, 3 and Total GHG emissions
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Metrics and targets – Gross Scopes 1, 2, 3 and Total GHG emissions
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Non-material datapoint
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Use of phase-in option
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk.			Use of phase-in option
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2:Banking book – Climate change transition risk: Loans collateralised by immovable property – Energy efficiency of the collateral			Use of phase-in option
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Use of phase-in option

LIST OF DATAPOINTS IN CROSS-CUTTING AND TOPICAL STANDARDS THAT DERIVE FROM OTHER EU LEGISLATION (ESRS 2 APPENDIX B)

Disclosure Requirement and related datapoint	(1) SFDR reference	(2) Pillar 3 reference	(3) Benchmark Regulation reference	(4) EU Climate Law reference	Subsection in the sustainability report
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Metrics and targets – Pollution of air, water and soil
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Impact, risk and opportunity management – Policies related to water and marine resources
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				Impact, risk and opportunity management – Policies related to water and marine resources
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Impact, risk and opportunity management – Policies related to water and marine resources
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Metrics and targets – Water consumption
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Metrics and targets – Water consumption
ESRS 2 – SBM-3 – E4, paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				Non-material datapoint
ESRS 2 – SBM-3 – E4, paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Non-material datapoint
ESRS 2 – SBM-3 – E4, paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				Non-material datapoint
ESRS E4-2 Sustainable land/agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Non-material datapoint
ESRS E4-2 Sustainable oceans/seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Non-material datapoint
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Non-material datapoint
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				Metrics and targets – Resource outflows
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				Metrics and targets – Resource outflows
ESRS 2-SBM3 – S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				ESRS S1: Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS 2-SBM3 – S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				ESRS S1: Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model

LIST OF DATAPOINTS IN CROSS-CUTTING AND TOPICAL STANDARDS THAT DERIVE FROM OTHER EU LEGISLATION (ESRS 2 APPENDIX B)

Disclosure Requirement and related datapoint	(1) SFDR reference	(2) Pillar 3 reference	(3) Benchmark Regulation reference	(4) EU Climate Law reference	Subsection in the sustainability report
ESRS S1-1 Human rights policy commitments, paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				Impact, risk and opportunity management – Policies related to own workforce
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		Impact, risk and opportunity management – Policies related to own workforce
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				Impact, risk and opportunity management – Policies related to own workforce
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				Impact, risk and opportunity management – Policies related to own workforce
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				Impact, risk and opportunity management – Processes to remediate negative impacts and channels for own workforce to raise concerns
ESRS S1-14 Number of fatalities and number and rate of work- related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Metrics and targets – Health and safety metrics Use of the phase-in option for non-employees, occupational diseases, and days lost
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				Metrics and targets – Health and safety metrics Use of the phase-in option for non-employees, occupational diseases, and days lost
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Metrics and targets – Remuneration metrics (pay gap and total remuneration)
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				Metrics and targets – Remuneration metrics (pay gap and total remuneration)
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				Metrics and targets – Incidents, complaints and severe human rights impacts
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Metrics and targets – Incidents, complaints and severe human rights impacts
ESRS 2-SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				ESRS S2: Strategy – Material impacts, risks and opportunities and their interaction with strategy and business model

LIST OF DATAPOINTS IN CROSS-CUTTING AND TOPICAL STANDARDS THAT DERIVE FROM OTHER EU LEGISLATION (ESRS 2 APPENDIX B)

Disclosure Requirement and related datapoint	(1) SFDR reference	(2) Pillar 3 reference	(3) Benchmark Regulation reference	(4) EU Climate Law reference	Subsection in the sustainability report
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Impact, risk and opportunity management – Policies related to value chain workers
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Impact, risk and opportunity management – Policies related to value chain workers
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Impact, risk and opportunity management – Policies related to value chain workers
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Impact, risk and opportunity management – Policies related to value chain workers
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				Impact, risk and opportunity management – Taking action on material impacts, risks and opportunities related to value chain workers and the effectiveness of those action
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Impact, risk and opportunity management – Policies related to affected communities
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Impact, risk and opportunity management – Taking action on material impacts, risks and opportunities related to affected communities and the effectiveness of those action
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				Impact, risk and opportunity management – Taking action on material impacts, risks and opportunities related to affected communities and the effectiveness of those action
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Non-material datapoint
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Non-material datapoint
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				Non-material datapoint

LIST OF DATAPOINTS IN CROSS-CUTTING AND TOPICAL STANDARDS THAT DERIVE FROM OTHER EU LEGISLATION (ESRS 2 APPENDIX B)

Disclosure Requirement and related datapoint	(1) SFDR reference	(2) Pillar 3 reference	(3) Benchmark Regulation reference	(4) EU Climate Law reference	Subsection in the sustainability report
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				Impact, risk and opportunity management – Business conduct policies and corporate culture
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				Non-relevant datapoint
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Metrics and targets – Incidents of corruption or bribery
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				Metrics and targets – Incidents of corruption or bribery

2. Environmental information

Disclosures in accordance with Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

Regulation (EU) 2020/852 – subsequently referred to as the EU Taxonomy – is a central instrument of the European Green Deal and the Action Plan on Financing Sustainable Growth. It serves to implement the EU's environmental objectives by 2050. The goal of the EU Taxonomy is to define standardized screening criteria as a way of creating transparency about which economic activities can be classified as environmentally sustainable. This is aimed at creating a common understanding of sustainability assessment among capital market stakeholders to foster the targeted routing of funds toward those areas that support the transition to a more sustainable economic system.

In this section, we use the following abbreviations for the six environmental objectives:

- **Climate change mitigation:** CCM
- **Climate change adaptation:** CCA
- **Pollution prevention and control:** PPC
- **Sustainable use and protection of water and marine resources:** WTR
- **Transition to a circular economy:** CE
- **Protection and restoration of biodiversity and ecosystems:** BIO

On the basis of Article 8 (1) of the EU Taxonomy and the delegated acts adopted in this connection, thyssenkrupp reports the type and scope of the group's environmentally sustainable economic activities in the disclosures in the sustainability report. For the first time, we are applying the full scope – both taxonomy eligibility and taxonomy alignment – to reporting all environmental objectives.

Due to unclarified legal terms, uncertainty still exists regarding the interpretation of the EU Taxonomy and delegated acts adopted.

Taxonomy-eligible business activities

A business activity is deemed to be taxonomy-eligible if it can be allocated to one of the economic activities described in the delegated acts of the EU Taxonomy – irrespective of whether or not it complies with the associated technical screening criteria. If this allocation is not possible, an activity is considered taxonomy-non-eligible.

Methodological principles of taxonomy eligibility

Based on an internal definition, business activities are only included in EU Taxonomy reporting if they generate external turnover or – in the case of activities related to research and development – they result in capital expenditure (CapEx) or operating expenditure (OpEx). In both cases, a materiality threshold of €1 million has been defined.

The business activities of entities that are not included in thyssenkrupp's consolidated financial statements – either in full or in part – are exempted from EU Taxonomy reporting. This applies above all to joint ventures accounted for using the equity method and to investments.

Process for determining taxonomy-eligible business activities

In order to determine thyssenkrupp's taxonomy-eligible business activities, the delegated acts issued in respect of the environmental objectives of the EU Taxonomy were analyzed by a central team of experts. Business activities that match the activities described there are allocated to the appropriate economic activity. The resulting preselection of potentially taxonomy-eligible activities are then assessed by the specialists of the respective segments and entities and reviewed for materiality. A final selection is then made. During this process, activities that were classified as taxonomy-eligible and included in previous years' reports were again subjected to specialist review and validation.

In the reporting year, as part of the process for determining taxonomy-eligible business activities, the services relating to chloralkali production – including electrode recoating, electrolyzer upgrades and the supply of spare parts – that are provided by thyssenkrupp nucera in the Decarbon Technologies segment were assessed as taxonomy-eligible, allocated to categories CE 5.1 "Repair, refurbishment and remanufacturing" and CE 5.2 "Sale of spare parts" and included in reporting. In addition, Uhde's FTR® (flakes-to-resin) process aimed at converting post-consumer PET flakes into new PET resin for return to the plastic cycle was classified as taxonomy-eligible, allocated to Category CE 2.7 "Sorting and material recovery of non-hazardous waste" and also included in reporting.

In the reporting year, the following thyssenkrupp business activities were considered taxonomy-eligible:

TAXONOMY-ELIGIBLE BUSINESS ACTIVITIES OF THYSSENKRUPP

Objective	No.	Economic activity in accordance with the delegated acts	Business activity or product	Segment	Unit
CCM	3.1	Manufacture of renewable energy technologies	Slewing bearings for wind turbines	Decarbon Technologies	rothe erde
CCM	3.2	Manufacture of equipment for the production and use of hydrogen	Water electrolysis technology	Decarbon Technologies	nucera
			Green chemicals	Decarbon Technologies	Uhde
CCM	3.6	Manufacture of other low carbon technologies	Oxygen-depolarised cathode (ODC)	Decarbon Technologies	nucera
			EnviNOx® technology	Decarbon Technologies	Uhde
			PLAneo® biopolymere technology	Decarbon Technologies	Uhde
			Clean ammonia (fertiliser)	Decarbon Technologies	Uhde
			Gas scrubbing technologies	Decarbon Technologies	Uhde
			polysius® pure oxyfuel	Decarbon Technologies	Polysius
			polysius® activated clay	Decarbon Technologies	Polysius
			meca-clay (mechano-chemical activation)	Decarbon Technologies	Polysius
CCM	3.9	Manufacture of iron and steel	Steel production	Steel Europe	–
CCM	3.18	Manufacture of automotive and mobility components	Automotive components	Automotive Technology	–
			Automotive components	Decarbon Technologies	rothe erde
			Automotive components	Materials Services	–
CCM	3.21	Manufacturing of aircraft	Aircraft parts	Decarbon Technologies	rothe erde
			Aircraft parts and services	Materials Services	Aerospace
CCM	5.9	Material recovery from non-hazardous waste	Slag processing	Materials Services	MillServices & Systems
CCM	6.6	Freight transport services by road	Logistics services	Materials Services	Supply Chain Services
CCM	6.14	Infrastructure for rail transport	Steel sleepers / ties	Materials Services	Schulte
CE	2.4	Treatment of hazardous waste	Phosphogypsum recycling technology	Decarbon Technologies	Uhde
CE	2.7	Sorting and material recovery of non-hazardous waste	FTR© recycling technology	Decarbon Technologies	Uhde
CE	4.1	Provision of IT/OT data-driven solutions	Digital Products	Decarbon Technologies	Uhde
			toii®	Materials Services	Materials IoT
CE	5.1	Repair, refurbishment and remanufacturing	Chlor-alkali services	Decarbon Technologies	nucera
CE	5.2	Sale of spare parts	Chlor-alkali services	Decarbon Technologies	nucera

Taxonomy-aligned business activities

A business activity is deemed to be taxonomy-aligned if it complies with the technical screening criteria of the EU Taxonomy and therefore makes a substantial contribution to at least one environmental objective. At the same time, in accordance with Article 17, it may not cause any significant harm to the other environmental objectives (do no significant harm – DNSH) and must also comply with the minimum social standards as described in Article 18.

To screen the taxonomy alignment of taxonomy-eligible business activities, thyssenkrupp creates profiles of the requirements for each relevant economic activity on the basis of the delegated acts. These profiles contain the qualitative and quantitative screening criteria as well as the resulting documentation and verification requirements. They serve as the basis for the site- and segment-related screening procedures in the reporting year. The overall process is coordinated centrally by an interdisciplinary team of experts and implemented in collaboration with the operating entities.

Turnover is the primary parameter for the technical screening criteria used in the screening procedures. This also applies to the CapEx and OpEx allocated to an economic activity, irrespective of their specific use. Although such expenditure may be allocated in part to other economic activities with different criteria defined in the delegated acts, this is ruled out by applying the principle that turnover has priority. As a result, the screening procedure focuses on

activities that generate turnover. In the case of activities relating to research or development that do not generate external turnover, the criteria may be based instead on the associated CapEx or OpEx.

Capital expenditure made in the context of a CapEx plan represents a special aspect of the screening procedure because the necessary verification of compliance with the technical screening criteria may not be available in full at the reporting date and must be provided at a later date.

The following paragraphs describe all the business activities that achieved a positive result in the screening procedure in the reporting year. They include a description of the screening criteria applied in each case and the method used to determine the material environmental contribution and any DNSH criteria relating to the activity. The procedure for screening the general DNSH requirements and minimum safeguards defined in Article 18 is explained separately.

CCM 3.1 Manufacture of renewable energy technologies

The technical screening criteria define that the manufactured technologies only contribute to climate change mitigation if they are used to generate renewable energy in accordance with Article 2 (1) of Directive (EU) 2018/2001. At thyssenkrupp, verification that the slewing bearings it manufactures are used in wind energy installations is provided by outgoing invoices from which customer groups can be identified. The DNSH criteria were screened on the basis of general auditing practices and verification documents. In addition, an equivalence assessment was carried out for relevant sites in third countries – specifically in China. Relevant European legislation (Regulation (EU) 2020/852, Directive 2000/60/EG, Directive 2011/92/EU) were compared with suitable Chinese laws such as the Water Law of the People's Republic of China and the Environmental Impact Assessment Law of the People's Republic of China, including the associated technical guidelines. On the basis of this assessment, *de jure* equivalence was established for environmental requirements.

CCM 3.2 Manufacture of equipment for the production and use of hydrogen

The technical screening criteria define that equipment are only deemed to contribute to climate change mitigation if they are used to produce hydrogen or hydrogen derivatives and the products manufactured reduce greenhouse gases during their life cycle in accordance with Annex V to Directive (EU) 2018/2001. For the water electrolysis plants screened in the reporting year, the tender documents issued by the EU Innovation Fund were used as verification. The DNSH criteria were screened on the basis of general auditing practices and documents.

CCM 3.9 Manufacture of iron and steel

According to the technical screening criteria, a substantial contribution to climate change mitigation exists if the emission thresholds for the individual steps in iron and steel production are complied with and – if relevant – process-dependent requirements for the use of secondary raw materials are satisfied. This was confirmed for the flat steel products bluemint® pure and bluemint® recycled because the emissions calculated for the balance sheet are within the specified thresholds. Product-specific certificates from an independent certification body were used for this purpose. Due to the processes involved, requirements for the use of secondary raw materials are not relevant for either product. Compliance with the DNSH criteria was screened on the basis of general auditing practices and verification documents. For this economic activity, it is also necessary to comply with the emission thresholds based on the best available technology (BAT). At the Duisburg site, the existing operating permits in accordance with European and German law are evidence of compliance with the applicable emission thresholds for iron and steel production. Moreover, no cross-media environmental impacts were identified in the reporting period.

CCM 3.18 Manufacture of automotive and mobility components

According to the technical screening criteria, a substantial contribution to climate change mitigation exists if the components produced serve a key function in decarbonizing the mobility sector – for example, through their use in vehicles with no direct carbon exhaust emissions such as battery electric vehicles (BEVs). In the reporting year, automotive components supplied by thyssenkrupp Automotive Technology and Materials Services for use exclusively in electric vehicles were assessed for their taxonomy alignment. To this end, vehicle projects were analyzed to establish whether they satisfied the criterion of "100% BEV." Compliance with the DNSH criteria was screened on the basis of general

practices and verification documents. In addition, an equivalence assessment was carried out for relevant sites in third countries – specifically in China, the USA and Mexico. In China, the relevant European legislation (Regulation (EU) 2020/852, Directive 2000/60/EC, Directive 2011/92/EU) was compared with the Water Law of the People's Republic of China and the Environmental Impact Assessment Law, including technical guidelines; *de jure* equivalence was established for environmental requirements. In the case of the USA and Mexico, relevant national legislation was also considered, including the Clean Water Act (CWA), the National Environmental Policy Act (NEPA) and relevant EPA regulations for the USA and the Ley de Aguas Nacionales, various Normas Oficiales Mexicanas (NOMs) and the Ley General del Equilibrio Ecológico y la Protección al Ambiente (LGEEPA) for Mexico; these were assessed to be largely equivalent.

CCM 5.9 Material recovery from non-hazardous waste

According to the technical screening criteria, a substantial contribution to climate change mitigation exists if at least 50% in terms of weight of the processed non-hazardous waste is converted into secondary raw materials that can be used in place of primary raw materials. The slag processing activity that was screened for alignment in the reporting year exceeded this amount and the secondary raw materials obtained were used in place of primary construction materials and fertilizers. This was verified by an analysis performed by a research institute specialized in construction materials. Compliance with the DNSH criteria was screened on the basis of general auditing practices and verification documents.

DNSH criteria "Climate change adaptation"

In accordance with the DNSH criteria for climate change adaptation, a climate risk and vulnerability assessment must be performed. This must be used to assess and, if necessary, implement appropriate adaptation solutions in order to effectively manage the risks identified. A site-related analysis of the possible climate risks was performed on the basis of recognized climate scenarios – especially RCP2.6 und RCP8.5 – for the business activities screened for taxonomy alignment in the reporting year. If risks were identified, this information was sent to the sites to enable them to determine the actual vulnerability (i.e., the site-specific probability of occurrence taking account of local conditions) to these climate risks using local sensitivity analyses. In addition, appropriate adaptation solutions were identified and implemented as necessary.

DNSH criteria "Sustainable use and protection of water and marine resources"

In accordance with the DNSH criteria relating to the sustainable use and protection of water and marine resources, a risk analysis of water quality and availability must be conducted and remedial action initiated if necessary, unless this is already covered by an environmental impact assessment (EIA) in accordance with Directive 2011/92/EU. In third countries, such analyses must be performed on the basis of national law or international standards if these ensure a comparable level of protection. For all the activities screened in the reporting year, site-related verification was obtained that enabled screening of compliance with these requirements, for example, permits, EIA documents, environmental audits and separate risk analyses.

DNSH criteria "Transition to a circular economy"

As a rule, the DNSH criteria in respect of the transition to a circular economy require an assessment of the availability and, where feasible, adoption of suitable techniques that support the following practices:

- Use of secondary raw materials and reused components in manufactured products
- Design for high durability, recyclability, easy disassembly and adaptability of products
- Waste management that prioritizes recycling over disposal
- Information on and traceability of substances of concern in products

For all the business activities screened in the reporting year, either a site-related assessment of the availability and application of the required processes and practices was conducted or existing verification documents showing compliance with these requirements were used, including operating permits, compliance and environmental audits or product-specific documents relating to material composition or other relevant properties.

DNSH criteria "Pollution prevention and control"

The DNSH criteria in this area require that economic activities do not lead to the manufacture, placing on the market or use of substances or groups of substances that are restricted or banned by European regulation. In particular, this relates to:

- Persistent organic pollutants as defined in Annexes I and II to Regulation (EU) 2019/1021
- Mercury and mercury compounds or mercury mixtures as defined in Article 2 of Regulation (EU) 2017/852
- Ozone-depleting substances as defined in Annexes I and II to Regulation (EC) No 1005/2009
- Hazardous substances in electrical and electronic appliances as defined in Annex II to Directive 2011/65/EU
- Chemical substances as defined in Annex XVII to Regulation (EC) No 1907/2006 (REACH)
- SVHCs (substances of very high concern) > 0.1% by mass, identified in accordance with REACH Article 59 (1), unless these substances have complied with Article 57 for at least 18 months

Exemptions apply if:

- substances occur only as unintentional trace contamination;
- the provisions of the respective regulation are complied with in full; or
- there are verifiably no available alternatives to SVHCs and they are used in a controlled manner.

For all the business activities screened in the reporting year, site-related verification was obtained which confirms that none of the aforementioned substances – either on their own, in mixtures or in articles – are placed on the market or used or are only used in the context of permissible exemptions. Suitable verification includes, in particular::

- CLP substance lists (CLP = classification, labeling and packaging) in accordance with Regulation (EC) No 1272/2008
- Declarations of conformity
- Safety data sheets
- Declarations of RoHS compliance (RoHS = restriction of hazardous substances)

DNSH criteria "Protection and restoration of biodiversity and ecosystems"

The DNSH criteria relating to the protection and restoration of biodiversity and ecosystems require the completion of an environmental impact assessment (EIA) or similar assessment in accordance with Directive 2011/92/EU, including the implementation of any necessary mitigation and remedial measures. For business activities conducted in or near biodiversity-sensitive areas (e.g., Natura 2000 areas, UNESCO World Heritage sites or other protected areas), it may be necessary to conduct additional compatibility assessments in accordance with Directive 2009/147/EC on the conservation of wild birds (Wild Birds Directive) and Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (FFH Directive). If necessary, actions must be taken to prevent negative impacts on the conservation targets. In third countries, national regulations or international standards must be applied if they ensure a comparable level of protection. For the activities screened in the reporting year, site-related verification was obtained that can be used to check compliance with the requirements. Such verification includes:

- Operating permits
- Preliminary EIA reviews or full EIAs
- Environmental audits
- Risk analyses of biodiversity and ecosystem protection

Compliance with the minimum safeguards

In accordance with Article 18 of the EU Taxonomy, undertakings must comply with certain minimum safeguards if they are to disclose turnover, investments or operating expenditure as taxonomy-aligned. This assumes that the undertaking has established processes that serve to ensure compliance with key international standards, including the:

- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights (UNGP)
- ILO Declaration on Fundamental Principles and Rights at Work
- International Bill of Human Rights

At thyssenkrupp, these requirements are embedded in binding corporate policies – the Code of Conduct (CoC), the principles of compliance with human rights and environmental due diligence obligations and the corporate governance statement. These are flanked by control and management systems such as compliance, risk and internal control management, which serve to ensure compliance with the minimum safeguards and the initiation of remedial action. The effectiveness of this process is reviewed regularly.

Calculations in respect of the EU Taxonomy

The parameters for monetary assessments in accordance with the EU Taxonomy are turnover, capital expenditure (CapEx) and operating expenditure (OpEx), They are calculated from the individual items listed in the following table. To calculate these parameters, a team of experts assesses relevant recording processes and posting accounts. This information is compiled at the operating entity level and then aggregated and validated on a groupwide basis.

TURNOVER, CAPITAL EXPENDITURE AND OPERATING EXPENDITURE ACCORDING TO THE EU TAXONOMY

Turnover[1]
Revenue from contracts with customers (IFRS 15)
Revenue from lease contracts (IFRS 16)

Capital Expenditure (CapEx)[2]
Additions to property, plant and equipment (IAS 16)
Additions to investment property (IAS 40)
Additions to intangible assets (IAS 38)
Additions to right-of-use assets (IFRS 16), excluding depreciation and remeasurements, including reversals of impairment losses and impairments[3]
Additions related to the aforementioned assets arising from business combinations

Operating Expenses (OpEx)
Research and development expenses
Expenses for short-term or low-value leases
Expenses for building refurbishments and for maintenance and repair of property, plant and equipment

[1] the turnover corresponds to the amount reported in the consolidated financial statements' income statement
[2] for further information, see Note 04 Intangible Assets and Note 05 Property, Plant and Equipment of the consolidated financial statements
[3] this also applies to additions under IAS 16, IAS 40 and IAS 38.

The calculation of taxonomy-eligible and taxonomy-aligned turnover, capital expenditure (CapEx) and operating expenditure (OpEx) is based on Article 8 of the EU Taxonomy and the disclosure requirements contained in Annex I of Delegated Regulation (EU) 2021/2178. The basis for this are the aforementioned individual items that were allocated to the taxonomy-eligible and taxonomy-aligned business activities, either directly or using allocation criteria, in the reporting period. Individual items that cannot be allocated to a taxonomy-eligible business activity are considered to be taxonomy-non-eligible and are included in the taxonomy-non-eligible portions of the parameters. The composition of the numerators and denominators for the key performance indicators of the EU Taxonomy is also based on the requirements in accordance with Annex I of the aforementioned Delegated Regulation and is shown in the following table.

CALCULATION OF THE PERFORMANCE INDICATORS UNDER THE EU TAXONOMY (KPIS)

KPI	Numerator	Denominator
Turnover	Turnover from taxonomy-aligned economic activities	Total turnover
Capital Expenditure (CapEx)	a) Capital expenditure related to taxonomy-aligned economic activities b) Capital expenditure that is part of a CapEx plan c) Capital expenditure referred to in Annex I, Section 1.1.2.2 (c) of Delegated Regulation (EU) 2021/2178	Total CapEx
Operating Expenses (OpEx)	a) Operating expenditures for taxonomy-aligned economic activities b) Operating expenditures that are part of a CapEx plan c) Operating expenditures in accordance with (EU) 2021/2178 Annex I, Section 1.1.3.2, letter (c)	Total OpEx

In order to avoid double counting across several economic activities in accordance with Annex I, point 1.2.2.1 of Delegated Regulation (EU) 2021/2178, turnover, capital expenditure and operating expenditure are allocated directly to these economic activities. If direct allocation is not possible, allocation is performed using appropriate allocation criteria. These may be based on customer groups, on market-oriented representative samples for turnover and on units of capital expenditure and operating expenditure. Double counting across several environmental objectives in accordance with Annex I, point 1.2.2.2 of the aforementioned regulation is avoided by allocating all amounts to just one of the EU Taxonomy environmental objectives.

Performance in respect of the EU Taxonomy

In fiscal year 2024 / 2025, the turnover generated by taxonomy-eligible economic activities amounted to €18,056 million, which was 55% of the group's total turnover. Compared with the prior year, this was a reduction of €1,605 million or one percentage point, mainly due to the overall decline in operations.

Taxonomy-eligible CapEx amounted to €1,073 million, which was €154 million higher year-on-year. It accounted for 72% of total capital expenditure, unchanged from a year earlier.

Taxonomy-eligible OpEx amounted to €1,304 million, accounting for 82% of total operating expenditure. Compared with the prior year, this was a decrease of €57 million or three percentage points.

PROPORTION OF TAXONOMY-ELIGIBLE AND TAXONOMY-ALIGNED TURNOVER BY ENVIRONMENTAL OBJECTIVE

Proportion of turnover/Total turnover	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	3.0%	51.7%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
CE	0.0%	0.3%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

PROPORTION OF TAXONOMY-ELIGIBLE AND TAXONOMY-ALIGNED CAPEX BY ENVIRONMENTAL OBJECTIVE

Proportion of CapEx/Total CapEx	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	8.7%	63.3%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
CE	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

PROPORTION OF TAXONOMY-ELIGIBLE AND TAXONOMY-ALIGNED OPEX BY ENVIRONMENTAL OBJECTIVE

Proportion of OpEx/Total OpEx	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	1.7%	80.7%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
CE	0.0%	0.1%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

In fiscal year 2024 / 2025, taxonomy-aligned turnover was €992 million after €306 million in the prior year, an increase of €686 million. The proportion of taxonomy-aligned turnover in the group's total turnover thus tripled to 3%. The main reason for this was the successful screening procedure at sites in third countries relating to economic activity CCM 3.1 "Manufacture of renewable energy technologies" and for business activities relating to economic activity CCM 3.18 "Manufacture of automotive and mobility components."

The taxonomy-aligned capital expenditure amounted to €130 million and, for the most part, resulted from the construction of the direct reduction plant (DR plant) in the Steel Europe segment as part of the CapEx plan and from additions to property, plant and equipment in connection with the taxonomy-aligned economic activity CCM 3.18 "Manufacture of automotive and mobility components." Therefore, the taxonomy-aligned capital expenditure accounted for 9% of total capital expenditure. In the prior year, a negative figure of €111 million was recorded for the taxonomy-aligned capital expenditure. The reason for this negative figure was the fact that government grants in connection with the construction of the DR plant exceeded the acquisition costs incurred in the prior year, therefore resulting in a negative share of 9% in arithmetic terms.

The taxonomy-aligned operating expenditure amounted to €27 million, accounting for 2% of the group's total operating expenditure and representing a year-on-year increase of one percentage point.

Further background information on the KPIs is presented in the tables below.

CONTEXTUAL INFORMATION ON THE KEY PERFORMANCE INDICATOR RELATED TO CAPITAL EXPENDITURE (CAPEX)

million €	2024 / 2025
CCM 3.1 Manufacture of renewable energy technologies	**21**
thereof additions related to taxonomy-aligned business activities	21
thereof additions as part of a CapEx plan	0
thereof additions due to business combinations	0
CCM 3.2 Manufacture of equipment for the production and use of hydrogen	**5**
thereof additions related to taxonomy-aligned business activities	5
thereof additions as part of a CapEx plan	0
thereof additions due to business combinations	0
CCM 3.9 Manufacture of iron and steel	**90**
thereof additions related to taxonomy-aligned business activities	0
thereof additions as part of a CapEx plan	90
thereof additions due to business combinations	0
CCM 3.18 Manufacture of automotive and mobility components	**12**
thereof additions related to taxonomy-aligned business activities	12
thereof additions as part of a CapEx plan	0
thereof additions due to business combinations	0
CCM 5.9 Material recovery from non-hazardous waste	**1**
thereof additions related to taxonomy-aligned business activities	1
thereof additions as part of a CapEx plan	0
thereof additions due to business combinations	0

CONTEXTUAL INFORMATION ON THE KEY PERFORMANCE INDICATOR RELATED TO OPERATING EXPENSES (OPEX)

million €	2024 / 2025
Operating expenses related to taxonomy-aligned business activities	27
Operating expenses as part of a CapEx plan	0
Operating expenses in accordance with (EU) 2021 / 2178 Annex I No. 1.1.3.2. lit. c	3
Total	**30**

CapEx plan to expand taxonomy alignment

A CapEx plan within the meaning of Delegated Regulation (EU) 2021/2178 is deemed to exist if its objective is to expand an undertaking's taxonomy alignment. This may be achieved either by transferring taxonomy-eligible to taxonomy-aligned activities or by expanding activities that have already been classified as taxonomy-aligned. A CapEx plan is reported at the level of the respective economic activity and must be approved by an undertaking's management body – i.e., the Executive Board of thyssenkrupp – or a delegated body.

The thyssenkrupp CapEx plan includes capital expenditure intended to transition the group's economic activity CCM 3.9 "Manufacture of iron and steel" from taxonomy eligibility to taxonomy alignment in respect of the environmental objective of climate change mitigation, thus enabling low-carbon steel production within the meaning of the EU Taxonomy.

The CapEx plan was approved by the Executive Board on February 10, 2023.

In the 2024 / 2025 reporting year, the project schedule was firmed up in the course of ongoing detailed planning. According to current planning, capital expenditure is envisaged until fiscal year 2028 / 2029. The adjustment of the schedule results from the complexity of switching various production steps to low-carbon steel production and justifies extending the term of the CapEx plan beyond five years. It has no impact on the fundamental ability of the new production technology to satisfy the technical screening criteria for the underlying economic activity. The budget for the CapEx plan was updated to reflect the change in planning.

The CapEx plan is still deemed approved by the Executive Board.

The adjustments made had no impact on the prorated capital expenditures allocated to the CapEx plan and published in previous reporting years.

In the context of the CapEx plan, net expenditure of €132 million was incurred in fiscal years 2022 / 2023 to 2023 / 2024. Capital expenditure amounted to €90 million in the reporting year. Previously, further capital expenditure of €542 million was envisaged over the remaining term of the CapEx plan. As a result of the aforementioned adjustment of the plan, this figure has increased by an amount in the mid three-digit million euro range.

The capital expenditure disclosed in the CapEx plan – both for the reporting year and for the entire term of the plan – has been adjusted for public-sector funding received (see also Note 05 "Property, plant and equipment" and Note 12 "Other non-financial assets" in the consolidated financial statements).

EU Taxonomy KPI reporting templates

The EU Taxonomy reporting templates in accordance with Annex V of Delegated Regulation (EU) 2023/2486 are presented below.

PROPORTION OF TURNOVER FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES

				Substantial contribution						DNSH criteria								
		Turnover	Share	CCM	CCA	WTR	PPC	CE	BIO	CCM	CCA	WTR	PPC	CE	BIO	MS	N-1	Category
Economic Activities	Code	million €	%	Y; N; N/EL[1]						Y/N						Y/N	%	E T
A. TAXONOMY-ELIGIBLE ACTIVITIES																		
A.1. Environmentally sustainable activities (Taxonomy-aligned)																		
Manufacture of renewable energy technologies	CCM 3.1	388	1	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1	E
Manufacture of equipment for the production and use of hydrogen	CCM 3.2	198	1	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	E
Manufacture of iron and steel	CCM 3.9	57	0	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	T
Manufacture of automotive and mobility components	CCM 3.18	334	1	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	E
Material recovery from non-hazardous waste	CCM 5.9	15	0	Y	N/EL	N/EL	N/EL	N	N/EL	Y	Y	Y	Y	Y	Y	Y	0	
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**992**	**3**	**100**	**0**	**0**	**0**	**0**	**0**								**1**	
of which enabling		920	3	93	0	0	0	0	0								1	
of which transitional		57	0	6													0	
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)				EL[2]; N/EL														
Manufacture of renewable energy technologies	CCM 3.1	50	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1	
Manufacture of equipment for the production and use of hydrogen	CCM 3.2	358	1	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1	
Manufacture of other low carbon technologies	CCM 3.6	90	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1	
Manufacture of iron and steel	CCM 3.9	8,275	25	EL	N/EL	N/EL	N/EL	N/EL	N/EL								26	
Manufacture of automotive and mobility components	CCM 3.18	7,451	23	EL	N/EL	N/EL	N/EL	N/EL	N/EL								24	
Manufacturing of aircraft	CCM 3.21	638	2	EL	N/EL	N/EL	N/EL	N/EL	N/EL								2	
Material recovery from non-hazardous waste	CCM 5.9	3	0	EL	N/EL	N/EL	N/EL	EL	N/EL								0	
Freight transport services by road	CCM 6.6	88	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0	
Infrastructure for rail transport	CCM 6.14	11	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0	
Treatment of hazardous waste	CE 2.4	2	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0	
Sorting and material recovery of non-hazardous waste	CE 2.7	1	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0	
Provision of IT/OT data-driven solutions	CE 4.1	1	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0	
Repair, refurbishment and remanufacturing	CE 5.1	7	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0	
Sale of spare parts	CE 5.2	89	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0	
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**17,064**	**52**	**99**	**0**	**0**	**0**	**1**	**0**								**55**	
Turnover of Taxonomy-eligible activities (A.1+A.2)		**18,056**	**55**	**99**	**0**	**0**	**0**	**1**	**0**								**56**	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																		
Turnover of Taxonomy-non-eligible activities		**14,781**	**45**														**44**	
TOTAL (A + B)		**32,838**	**100**															

[1] Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective
N – No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective
N/EL – not eligible, Taxonomy non-eligible activity for the relevant environmental objective

[2] EL – Taxonomy eligible activity for the relevant objective

PROPORTION OF CAPEX FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES

				Substantial contribution						DNSH criteria									
		CapEx	Share	CCM	CCA	WTR	PPC	CE	BIO	CCM	CCA	WTR	PPC	CE	BIO	MS	N-1	Category	
Economic Activities	Code	million €	%	Y; N; N/EL[1]						Y/N						Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Manufacture of renewable energy technologies	CCM 3.1	21	1	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1	E	
Manufacture of equipment for the production and use of hydrogen	CCM 3.2	5	0	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	E	
Manufacture of iron and steel	CCM 3.9	90	6	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	(10)		T
Manufacture of automotive and mobility components	CCM 3.18	12	1	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	E	
Material recovery from non-hazardous waste	CCM 5.9	1	0	Y	N/EL	N/EL	N/EL	N	N/EL	Y	Y	Y	Y	Y	Y	Y	0		
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**130**	**9**	**100**	**0**	**0**	**0**	**0**	**0**								**(9)**		
of which enabling		39	3	30	0	0	0	0	0								1		
of which transitional		90	6	70													(10)		
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)				EL[2]; N/EL															
Manufacture of renewable energy technologies	CCM 3.1	5	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1		
Manufacture of equipment for the production and use of hydrogen	CCM 3.2	74	5	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1		
Manufacture of other low carbon technologies	CCM 3.6	4	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Manufacture of iron and steel	CCM 3.9	565	38	EL	N/EL	N/EL	N/EL	N/EL	N/EL								49		
Manufacture of automotive and mobility components	CCM 3.18	276	18	EL	N/EL	N/EL	N/EL	N/EL	N/EL								27		
Manufacturing of aircraft	CCM 3.21	20	1	EL	N/EL	N/EL	N/EL	N/EL	N/EL								2		
Material recovery from non-hazardous waste	CCM 5.9	0	0	EL	N/EL	N/EL	N/EL	EL	N/EL								0		
Freight transport services by road	CCM 6.6	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Infrastructure for rail transport	CCM 6.14	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Treatment of hazardous waste	CE 2.4	0	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0		
Sorting and material recovery of non-hazardous waste	CE 2.7	0	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0		
Provision of IT/OT data-driven solutions	CE 4.1	0	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0		
Repair, refurbishment and remanufacturing	CE 5.1	0	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0		
Sale of spare parts	CE 5.2	0	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**944**	**63**	**100**	**0**	**0**	**0**	**0**	**0**								**81**		
CapEx of Taxonomy-eligible activities (A.1+A.2)		**1,073**	**72**	**100**	**0**	**0**	**0**	**0**	**0**								**72**		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy-non-eligible activities		**418**	**28**														**28**		
TOTAL (A + B)		**1,492**	**100**																

[1] Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective
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N/EL – not eligible, Taxonomy non-eligible activity for the relevant environmental objective
[2] EL – Taxonomy eligible activity for the relevant objective

PROPORTION OF OPEX FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES

				Substantial contribution						DNSH criteria									
		OpEx	Share	CCM	CCA	WTR	PPC	CE	BIO	CCM	CCA	WTR	PPC	CE	BIO	MS	N-1	Category	
Economic Activities	Code	million €	%	Y; N; N/EL[1]						Y/N						Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Manufacture of renewable energy technologies	CCM 3.1	20	1	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1	E	
Manufacture of equipment for the production and use of hydrogen	CCM 3.2	0	0	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	E	
Manufacture of iron and steel	CCM 3.9	1	0	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0		T
Manufacture of automotive and mobility components	CCM 3.18	2	0	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	E	
Material recovery from non-hazardous waste	CCM 5.9	4	0	Y	N/EL	N/EL	N/EL	N	N/EL	Y	Y	Y	Y	Y	Y	Y	0		
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**27**	**2**	**100**	**0**	**0**	**0**	**0**	**0**								**1**		
of which enabling		22	1	83	0	0	0	0	0								1		
of which transitional		1	0	3													0		
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)				EL[2]; N/EL															
Manufacture of renewable energy technologies	CCM 3.1	4	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1		
Manufacture of equipment for the production and use of hydrogen	CCM 3.2	37	2	EL	N/EL	N/EL	N/EL	N/EL	N/EL								2		
Manufacture of other low carbon technologies	CCM 3.6	2	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Manufacture of iron and steel	CCM 3.9	1,083	68	EL	N/EL	N/EL	N/EL	N/EL	N/EL								71		
Manufacture of automotive and mobility components	CCM 3.18	134	8	EL	N/EL	N/EL	N/EL	N/EL	N/EL								9		
Manufacturing of aircraft	CCM 3.21	8	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1		
Material recovery from non-hazardous waste	CCM 5.9	1	0	EL	N/EL	N/EL	N/EL	EL	N/EL								0		
Freight transport services by road	CCM 6.6	7	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1		
Infrastructure for rail transport	CCM 6.14	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Treatment of hazardous waste	CE 2.4	0	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0		
Sorting and material recovery of non-hazardous waste	CE 2.7	1	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0		
Provision of IT/OT data-driven solutions	CE 4.1	0	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0		
Repair, refurbishment and remanufacturing	CE 5.1	0	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0		
Sale of spare parts	CE 5.2	0	0	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**1,277**	**81**	**100**	**0**	**0**	**0**	**0**	**0**								**84**		
OpEx of Taxonomy eligible activities (A.1+A.2)		**1,304**	**82**	**100**	**0**	**0**	**0**	**0**	**0**								**85**		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomy-non-eligible activities		**277**	**18**														**15**		
TOTAL (A + B)		**1,581**	**100**																

[1] Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective
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[2] EL – Taxonomy eligible activity for the relevant objective

Standard reporting templates for disclosures in accordance with Article 8 (6) and (7)

ACTIVITIES RELATED TO NUCLEAR ENERGY AND FOSSIL GAS

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

ESRS E1 Climate change

This subsection concerns the impact of operations on climate change and the resulting risks and opportunities for the company. It describes how greenhouse gas (GHG) emissions are recorded along the value chain, which strategies and actions exist to reduce emissions and adapt to climate change, and how climate-related aspects are integrated in governance and the business strategy, thus demonstrating the resilience of thyssenkrupp's business model to transition and physical climate risks and the ability to leverage climate-related opportunities.

Strategy

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The following explains the material impacts, risks and opportunities in connection with climate change that were identified by the materiality assessment performed and are significant to thyssenkrupp's operations and business model.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATING TO CLIMATE CHANGE

Topic	Category[1]	Description	VC[2]	TH[3]
Climate change	I (-)	Operations that emit greenhouse gases result in an increase in the atmospheric greenhouse gas concentration, which in turn is associated with changes in the global climate. These changes may have a negative impact on the environment and human health, causing costs to society for both damages and adaptation.	U, Op, D	S, M
	R	Shifts in demand toward more sustainable products with a lower carbon content represent a financial risk for thyssenkrupp due to the reduced sales potential for existing products and the need to adapt product design, production processes or the materials used.	Op	/
	R	Political, regulatory and market requirements relating to the sustainability transformation is increasing demand for low-carbon technologies and certain critical materials. This may result in higher procurement costs and occasional or structural supply bottlenecks and thus represents a risk for thyssenkrupp.	Op	/
	R	Increasingly frequent and intense extreme weather events may result in supply bottlenecks, production stoppages, higher repair costs and increased insurance premiums and thus represent a risk for thyssenkrupp.	Op	/
	O	An innovative, low-carbon product portfolio may have a positive impact on thyssenkrupp's reputation and competitiveness and strengthen the company's access to the markets that are relevant to growth.	Op	/
Energy	I (-)	The greenhouse gas emissions caused by energy consumption result in an increase in the atmospheric greenhouse gas concentration, which in turn is associated with changes in the global climate. These changes may have a negative impact on the environment and human health.	U, Op, D	S, M

[1] I = impact; (-) = negative; (+) = positive; R = risk; O = opportunity
[2] VC = value chain; U = upstream; Op = own operations; D = downstream
[3] TH = time horizon; S = short-term; M = medium-term; L = long-term

Resilience analysis of the strategy and business model in respect of climate change

In the 2024 / 2025 reporting year, the company performed a scenario analysis in order to systematically identify material climate-related risks and opportunities, as well as their potential impacts on the strategy and business model. This analysis integrates the findings of the double materiality assessment and is oriented toward the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) in that it covers the approach for including governance, strategy, risk management, metrics and targets, and transition and physical risks

Transition climate risks and opportunities

The analysis of the transition climate risks and opportunities was performed on the basis of a company-specific combined scenario. It is based on the Net-Zero-by-2050 scenario of the International Energy Agency (IEA; 2021) as the leading reference pathway, supplemented by content from the EU 1.5Tech reference scenario for technological aspects and by findings from the IPCC's SSP1-1.9 (AR6) scenario to address the limitations of the leading IEA scenario, especially its global aggregation level, the focus on transition rather than physical climate risks and the highly standardized assumptions with no probability of occurrence. The orderly transition scenario is aimed at limiting global warming to 1.5 degrees Celsius and reducing net emissions of greenhouse gases to zero by 2050 with the aid of ambitious climate policy, technological innovation and far-reaching transformation processes. The leading scenario is in line with thyssenkrupp's GHG reduction targets, which have been assessed by the Science-Based Targets initiative (SBTi) and, due to the orderly decarbonization pathway based on technological innovation, is suitable for identifying material transition risks and opportunities associated with the green transformation. Although the IEA published an updated net zero roadmap in 2023, the 2021 net zero scenario continues to be recognized by science and industry as an international reference pathway that is consistent with 1.5-degree Celsius compatibility and thus represents the current state of the art. Moreover, the central assumptions and development pathways of this scenario are compatible with the climate-related assumptions that underpin the investment calculations chosen by the group and the assessment of climate-related financial risks. In particular, the regulation-driven increase in external carbon pricing in the reporting period reflects the shadow carbon price used in financial assessments (see subsection "E1-8").

The analysis examines two time horizons: 2030 as the medium-term horizon that includes the intermediate targets of reducing emissions in line with the 1.5-degree Celsius target of the Paris Climate Agreement and 2050 as the long-term horizon reflecting global net zero ambitions. The focus of the analysis was the 2030 time horizon, which is in line with thyssenkrupp's intermediate targets on its path to net zero emissions. For the long-term horizon through 2050, the analysis is associated with greater uncertainties. Due to the information available at the reporting date, there is only a limited possibility of reliably quantifying climate-related risks and opportunities. For this reason, the statements were restricted to an overarching level. Moreover, the reliability of the information is subject to uncertainties in respect of social developments, technological pathways and customers' willingness to make final investment decisions (FID), as well as other external impact drivers.

Potential climate-related transition events that might be significant were identified along the value chain. These include political, economic and technological changes that might have an impact on business activities, markets and supply chains. The transition events were assessed qualitatively in respect of the probability of their occurrence and impacts. Leading sustainability experts from the segments participated in identifying and assessing the events. The findings were aggregated at group level, where they underwent a final assessment and prioritization.

The analysis identified material transition risks in several areas such as regulatory risks in connection with carbon pricing by, for example, the EU Emission Trading Scheme (EU ETS), as well as infrastructure and economic risks relating to the expansion of the hydrogen economy. In addition, demand-side uncertainties were identified as material transition risks in relation to market acceptance – especially regarding the willingness to pay for products with a lower carbon content than conventional products, which are being limited by growing competitive pressure. Other risks were identified that might occur in the downstream value chain, especially as the result of customer reticence to invest – with corresponding impacts on thyssenkrupp's market opportunities – and the risk that neutralization technologies for carbon capture and storage or use are not recognized as options for reducing GHG emissions. The security of supply with critical starting products and materials is also a transition risk.

At the same time, material climate-related opportunities were identified in connection with the industrial transition to a decarbonized economic system. With products and technologies that facilitate low-emission manufacturing, such as CO_2-reduced steel, electrolyzers for renewable hydrogen, processes for the basic material and chemical industries and system components for the generation of renewable energy, thyssenkrupp can position itself as a provider of solutions for lower-carbon industrial value chains. These areas harbor new sales and earnings potential for thyssenkrupp and, at the same time, could strengthen the company's brand value and enable it to access new customer groups and safeguard jobs.

Physical climate risks

The scenario analysis examined physical climate risks as well as transition risks. This assessment covered both acute and chronic risk types, including flooding, water and heat stress, storms and coastal erosion in accordance with the classifications of physical climate risks contained in the EU Taxonomy (Delegated Regulation (EU) 2021/2139, Appendix A) and ESRS E1. The analysis of physical climate risks performed as part of the resilience analysis is applied to the company's operating sites and does not include the upstream and downstream value chain.

A structured four-step methodology was used for the analysis, in line with the requirements of the EU Taxonomy and ESRS 2 IRO-1. It was based on high-resolution climate projections from the CMIP6 model set, taking account of various emission and development pathways, including RCP2.6, RCP4.5, RCP6.0 and the particularly emissions-intensive SSP5-8.5 / RCP8.5 scenario, combined with geospecific risk data. These include spatially resolved, site-related information on the probability, intensity and evolution of climate risks over time, based on locally projected climate scenarios and regional risk models. A time horizon until 2055 was examined. In the first step, the vulnerabilities specific to a site and activity were assessed on the basis of structured indicators – for example, relating to construction features, critical infrastructure and the industry-specific classification of an economic activity. Where there were gaps in the data, a conservative medium to high value was assumed so that risks were not underestimated. In the second step, climate-related risks were assessed on the basis of the aforementioned climate projections; this assessment covered both acute risks such as flooding, heat waves and storms and chronic risks such as long-term temperature increases, water stress and soil degradation in terms of their probability of occurrence, intensity and development over time. In the third step, a standardized assessment formula was used to translate the findings for vulnerability and risk into a site-specific climate risk indicator on a standard scale from 0 to 1; the findings were classified in six risk levels ranging from zero to very high, reflecting the highest risk identified for each site. In the fourth step, specific adaptation recommendations were derived for the sites with a high or very high risk. These recommendations are aligned with the risk type and the local economic activity; priority is given to nature-based solutions and green infrastructures.

As a result of this analysis, 57 sites with at least one elevated physical climate risk were identified; one of these is a site with a very high risk. Physical climate risks particularly affected sites in:

- Coastal regions with a high risk of flooding and coastal erosion
- Central, Southern and Southwestern Europe with an elevated risk due to water stress
- Central Europe with an elevated risk due to drought
- Sites worldwide with an elevated risk due to river flooding

As part of the analysis, specific adaptation recommendations were prepared for the affected sites. These recommendations focused on the type of risk identified and on the respective economic activity. The adaptation recommendations include, for example:

- Flood protection measures (e.g., local barriers, drainage systems)
- Strategies for cooling and reducing heat in buildings
- Water-related adaptations in regions at risk of water stress
- Assessments of medium-term adaptability (e.g., modernization) at sites

However, the specific necessity for implementing such adaptation recommendations must be assessed for each site on the basis of further reviews and validation.

A time horizon until 2055 was applied in analyzing physical climate risks. This is compatible with the time horizons until 2030 and 2050 used in the analysis of transition risks and opportunities and with the GHG reduction targets for these years in accordance with subsection “E1-4.”

The method for analyzing physical climate risks displays limitations. Although the CMIP6 climate models used (RCP2.6–RCP8.5) deliver high-resolution projections, they reflect regional and local context factors to only a limited extent. Site-related vulnerabilities are assessed on the basis of standardized indicators. Where there are gaps in the data, conservative assumptions are made, which may limit the accuracy. The analysis is a snapshot of a given moment that does not take account of either dynamic changes in future scenarios or financial impacts; it covers only the company’s own operating sites, but not the upstream and downstream stages in the value chain.

Resilience of the strategy and business model

The goal of the scenario analysis was to assess the resilience of the corporate green transformation strategy in respect of climate-related risks and its ability to leverage opportunities. The analysis showed that the strategy is resilient overall but that critical success factors for its implementation are the economic availability of renewable hydrogen and the development of sales markets for products with a lower carbon content than conventional products and for technologies that are themselves low-emission or facilitate emission reductions.

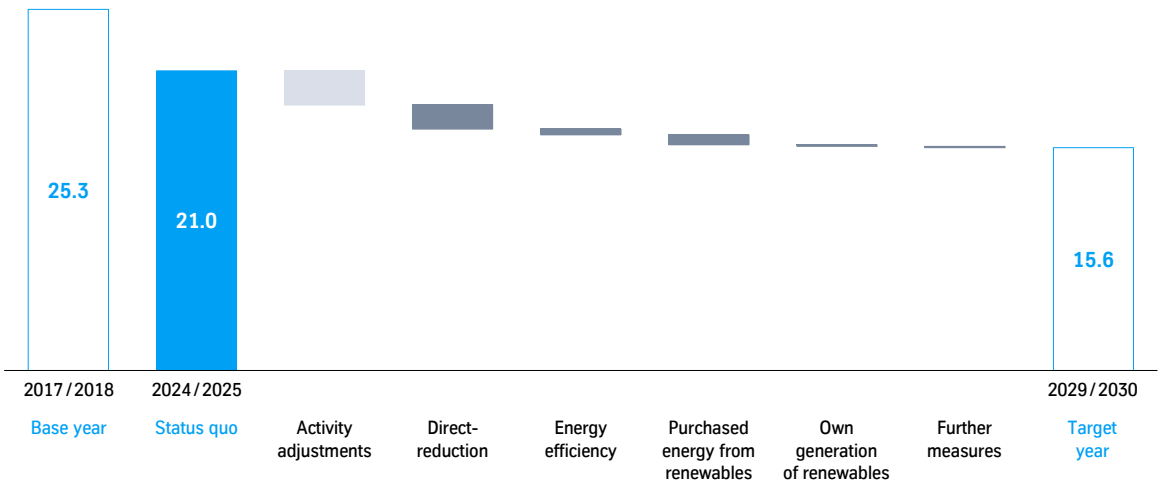
thyssenkrupp is pursuing the goal of achieving net zero emissions by 2050 at the latest and is aligning with the 1.5-degree Celsius target of the Paris Climate Agreement to achieve this. The transition plan for climate change mitigation is embedded as a central element of the corporate strategy and serves as an instrument for achieving this goal. Among the main actions are the establishment of hydrogen-capable steel production, the development and marketing of products with a lower carbon content than conventional products and of technologies that are themselves low-emission or facilitate lower emissions, and collaborations with suppliers to decarbonize the supply chain. These actions are aimed at strengthening the resilience of the business model.

At thyssenkrupp, physical climate risks are additionally addressed in the context of insurance-related risk management, which covers risk avoidance and mitigation measures alongside risk transfer mechanisms. In this context, structured hedging and provisions serve to increase both organizational and financial resilience. Further information on insurance-related risk management can be found in subsection “E1-2.”

E1-1 – Transition plan for climate change mitigation

The transition plan for climate change mitigation is the main instrument for implementing thyssenkrupp's climate strategy. It serves as the operating framework for the stepwise decarbonization of the company across its value chain and includes ambitious GHG reduction targets. The paragraphs below describe the targets, actions, progress and financial resources for the transition plan.

PLANNED UTILIZATION OF KEY DECARBONIZATION LEVERS FOR SCOPE 1 UND 2 EMISSIONS UNTIL 2030
in mn t CO_2e



Compatibility with the 1.5-degree Celsius target of the Paris Climate Agreement

The transition plan for climate change mitigation is compatible with the target of restricting global warming to 1.5 degrees Celsius, as specified in the Paris Climate Agreement. This is based on the planned attainment of net zero emissions groupwide by 2050 at the latest and the definition of science-based intermediate and long-term targets. The reduction targets for Scope 1, 2 and 3 GHG emissions set in the context of the transition plan were analyzed by SBTi and satisfy the requirements in terms of timing and ambition as defined in the current Corporate Net-Zero Standard. In June of the 2024 / 2025 reporting year, the transition plan target system was assessed by SBTi to be compatible with the 1.5-degree Celsius pathway. Further information on the GHG reduction targets can be found in subsection "E1-4" and "E1-6."

Decarbonization and central actions

The main lever for reducing GHG emissions in the company's own operations is the transformation of steel production, especially by constructing and operating a fully hydrogen-capable DR plant. Other key decarbonization levers for the company's own operations include actions to increase energy and process efficiency, the switch of third-party energy supply to renewable sources and the company's own generation of renewable energy. The adaptation of production volumes – especially for steel – also has an impact on the group's direct GHG emissions, but is not an active decarbonization lever.

The main lever for mitigating upstream indirect GHG emissions is the targeted purchase of raw materials, materials and starting products with a lower carbon content than conventional products. In the case of downstream indirect GHG emissions, the main lever is the technological refinement of the product portfolio, especially in plant engineering. The goal is to deliver technologies that are themselves low-emission or facilitate lower emissions and, as result, enable customers to use production processes that emit less or no CO_2 compared with conventional processes in their respective fields of application.

Investments, spending and financing the transition plan

The implementation of the transition plan for climate change mitigation is closely tied to the company's financial planning. Some of the necessary CapEx and OpEx is financed from the company's own capital resources – including for actions to increase energy and process efficiency or to switch third-party energy supply to renewable sources. Moreover, the implementation of some aspects of the transition plan is being funded by government grants, especially the construction of the fully hydrogen-capable DR plant in Duisburg for which funding commitments from the governments of Germany and North Rhine-Westphalia were already obtained in fiscal year 2022 / 2023.

To ensure consistent recording and reporting, the monetary assessment of the actions to implement the transition plan is based on the CapEx and OpEx definitions in the EU Taxonomy. In summary, this results in the following disclosures:

In the reporting year, operating expenditure (OpEx) for implementing the transition plan was around €8 million and capital expenditure (CapEx) around €104 million. The bulk of the capital expenditure – approximately €90 million– went to the ongoing construction of the hydrogen-capable DR plant in Duisburg. The capital expenditure associated with switching various productions steps to low-steel carbon production is also reported as part of the CapEx plan in accordance with the EU Taxonomy. The goal of the CapEx plan is to enable low-carbon steel production by thyssenkrupp in accordance with the criteria defined in Delegated Regulation (EU) 2021/2139. For the period from fiscal year 2025 / 2026 to fiscal year 2029 / 2030, cumulated expenditure of around €1billion is envisaged for further implementation of all decarbonization measures in the transition plan.

Locked-in risks and emissions-intensive assets

thyssenkrupp analyzes central assets – especially installations, the associated operating processes and the product portfolio – in respect of existing greenhouse gas emissions and those expected in the future throughout their entire life cycle or customary period of use. These are known as locked-in emissions. The focus is on the company's carbon-based steel products and the use of the technical installations sold by the Decarbon Technologies segment in the downstream value chain.

As steel production is the main driver of emissions within the company's own operations and plant engineering is the main driver of emissions in the upstream and downstream value chain, the transition plan defines specific focuses for reducing emissions in these emissions-intensive core areas. Therefore, these emission hot spots are considered in both the risk and resilience analyses. The time horizons used in the analysis are the same as those used in the assessment described in subsection "ESRS 2 SBM-3" and extend from the reporting year to 2030 and 2050, respectively.

It should be noted that the decarbonization levers of the transition plan – especially the establishment of hydrogen-capable steel production and the adaptation of the product portfolio to CO_2-reduced products and technologies that are themselves low-emission or facilitate lower emissions – are aimed at reducing GHG emissions and may serve as the basis for achieving the intermediate GHG reduction targets and the long-term target of net zero emissions by 2050. Further information can be found in subsections "ESRS 2 SBM-3," "E1-4" and "E1-6" in this section.

Paris-aligned Benchmarks

thyssenkrupp is **not** excluded from the Paris-aligned Benchmarks because the proportion of relevant sales in total net revenue – as defined by the exclusion criteria in Article 12 (1) (d) to (g) and (2) of Delegated Regulation (EU) 2020/1818 – is below the thresholds for this purpose.

Integration in the business strategy and approval by the management bodies

The transition plan is an integral element of thyssenkrupp's corporate strategy, which is aimed at achieving profitable and sustainable growth. Therefore, the green transformation is one of the central strategic areas of action, alongside portfolio and performance. The anchoring of the transition plan is particularly evident from the fact that business models focus on decarbonization. One example can be found in the Decarbon Technologies segment, which consolidates the provision of key technologies for low-emission industrial production. These include technologies for the

production of renewable hydrogen, for the CO_2-reduced production of cement (compared with conventional processes) and for concepts for CO_2-reduced basic material and chemical industries. This strategic alignment enables the company to reduce indirect GHG emissions in the downstream value chain and, at the same time, access the market potential harbored by the industrial transition to a sustainable economic system.

The Executive Board gave its formal approval to the transition plan in the 2024 / 2025 reporting year. Also in the 2024 / 2025 reporting year, the Supervisory Board then integrated new climate-related targets based on the transition plan into the long-term compensation for the Executive Board and top-level management.

Progress in implementing the transition plan

One key aspect of progress in implementing the transition plan has been the definition of medium- and long-term GHG reduction targets, including the target of achieving net zero emissions groupwide by 2050. The target was formalized in fiscal year 2023 / 2024 in an official declaration submitted by the Executive Board of thyssenkrupp AG to SBTi.

Further progress was made in the construction of the DR plant in Duisburg, which is the main decarbonization lever for GHG emissions in the company's own operations. Following approval of the capital resources for this investment by the thyssenkrupp Executive Board and Supervisory Board in fiscal year 2021 / 2022, the dismantling work and preparation of the site were completed. The first steps in the construction of the DR plant have been ongoing since fiscal year 2023 / 2024. Further information on progress in constructing the DR plant can be found in the "Report on the economic position."

Progress was also made in respect of the energy efficiency decarbonization lever. thyssenkrupp has been operating its Groupwide Energy Efficiency Program (GEEP) since fiscal year 2012 / 2013 and the progress achieved is reported each year. In fiscal year 2024 / 2025 efficiency measures made it possible to achieve energy savings of 162 GWh, which is equivalent to a reduction of 75 kt CO_2e.

Moreover, the proportion of electricity used that came from renewable sources was also increased. In the 2024 / 2025 reporting year, 621 GWh of electricity came from renewable resources, which cut emissions by 77 kt CO_2e year-on-year. Additionally, the company used 27 GWh of renewable energy it had generated itself, enabling a further reduction of 6 kt CO_2e in GHG emissions.

Impact, risk and opportunity management

E1-2 – Policies related to climate change mitigation and adaptation

The policies covered by this disclosure requirement relate to material issues in connection with climate change, both in terms of the reduction of greenhouse gas emissions and the adaptation to climate-related changes.

Transition plan for climate change mitigation

The transition plan for climate change mitigation at thyssenkrupp is aimed at achieving net zero emissions by 2050 as the result of decarbonizing production, products and energy. Among the main levers are the establishment of hydrogen-capable steel production, the development of a product portfolio for CO_2-reduced value creation, the improvement in energy efficiency and the increased use of renewable energy, also as a result of the company's own generation activities. Climate-related transition risks such as carbon pricing and market changes are addressed. Physical adaptation to the impacts of climate change is not a primary focus.

TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

Category	Description
Content of the policy	Target system for decarbonization by 2050 in accordance with the 1.5-degree Celsius target of the Paris Climate Agreement Implementation plan for achieving medium- and long-term GHG reduction targets Management of climate-related impacts, risks and opportunities
Scope	GHG emissions resulting directly from sources owned by or under the control of thyssenkrupp GHG emissions resulting from the generation of purchased energy used by thyssenkrupp GHG emissions resulting from activities in the value chain outside the direct control of thyssenkrupp
Level of responsibility	Chief Sustainability Officer
External reference framework	Paris Convention Science-Based Targets initiative (SBTi)
Stakeholder information	Transition plan for climate change mitigation accessible via the annual report
Applied in the report	E1

The target of attaining net zero emissions groupwide by 2050 at the latest is based on science-based medium- and long-term targets in the system that was assessed by SBTi in fiscal year 2024 / 2025 as being compatible with the 1.5-degree Celsius target of the Paris Climate Agreement.

One main lever for achieving this target is the decarbonization of steel production, especially by constructing and operating a fully hydrogen-capable DR plant. During the transition phase, the plant can be operated with natural gas before a switch is made to renewable electricity and hydrogen. The transition plan is supplemented by groupwide measures to improve energy and process efficiency and increase the use of renewable energy, both from external sources and, to a growing extent, generated by the company itself. Moreover, its is planned to use neutralization technologies to capture and store or use unavoidable GHG emissions.

The transition plan also addresses indirect GHG emissions across the value chain – in the upstream value chain through the use of CO_2-reduced raw materials and starting products, the extraction and manufacture of which are usually associated with lower emissions from combustion, and in the downstream value chain as a result of developing and marketing products with a lower carbon content than conventional products and technologies that are themselves low-emission or facilitate lower emissions. With these products and technologies, thyssenkrupp is seeking to help its customers mitigate their GHG emissions and achieve their climate targets. In this way, the transition plan also accesses the market potential harbored by the industrial transition to a more sustainable economic system.

It likewise addresses key transition risks, such as energy price-related cost increases resulting from carbon pricing, stricter emissions requirements and stakeholders' increasing sustainability expectations due to the decarbonization of energy supply, production and the product portfolio.

Key management mechanisms in the transition plan include defined metrics, continuous monitoring by way of the annual greenhouse gas balance sheets and the regular assessment of progress in the context of sustainability reporting.

Insurance-related risk management

Insurance-related risk management addresses the climate-related need for adaptation by hedging against physical risks such as storms, heat and flooding. The goal here is to prevent or mitigate potential impacts. Transition risks such as supply-side bottlenecks due to a transformation-related increase in demand for certain materials and products are addressed in the context of business continuity management, which is part of this policy.

INSURANCE-RELATED RISK MANAGEMENT

Category	Description
Content of the policy	Management and hedging of certain corporate risks, including physical climate risks and supply risks due to the transformation
Scope	thyssenkrupp group On a case-by-case basis, investments (minority interests, 50 / 50 joint ventures) Contractually involved third parties (e.g., contract workers, external service providers)
Level of responsibility	Head of Group Finance
External reference framework	-
Stakeholder information	Internal policies are accessible to employees via the company's intranet
Applied in the report	E1

Through insurance-related risk management, the group seeks to hedge certain corporate risks. Physical climate risks are a central aspect of this approach, with the goal of specifically strengthening resilience to the physical impacts of climate change.

One focus is on physical climate risks such as storms, flooding and heat waves that may cause damage to production installations and infrastructure or disrupt supply chains. In order to limit the financial consequences of property damage and business interruptions, thyssenkrupp relies on risk-based insurance solutions. In this connection, risks are systematically identified and assessed as the basis for developing suitable hedging measures.

In respect of certain climate-related transition risks, for example, caused by supply-side bottlenecks due to a transition-related increase in demand for selected materials and products, thyssenkrupp relies on systematic business continuity management as a way of strengthening its operational resilience. Key measures are the early identification of critical dependencies and the development of contingency and recovery plans.

Regular risk analyses and the review of existing insurance concepts in respect of loss scenarios, probabilities of occurrence and prevention potential serve to systematically identify, assess and monitor climate-related loss risks.

E1-3 – Actions and resources in relation to climate change policies

Implementing the transition plan for climate change mitigation serves as the central framework for achieving net zero emissions groupwide by 2050 at the latest. It covers specific actions for decarbonizing the energy supply, production and the product portfolio. The transition plan is flanked by policies to manage certain climate-related risks.

One focus for decarbonizing the group is the construction and operation of a fully hydrogen-capable DR plant. During the transition phase, the plant can initially be operated with natural gas before a switch is made to renewable hydrogen. In addition, thyssenkrupp is taking ongoing action with no fixed end date, including the gradual replacement of fossil energy sources, the use of renewable energy, efficiency improvements in energy and production processes and the development and marketing of products with a lower carbon content than conventional products and of technologies that are low-emission themselves or facilitate emission reductions – including materials, system solutions for the hydrogen economy and technologies to decarbonize energy-intensive production processes. Technologies to capture and store or use unavoidable GHG emissions can also be used. Further actions for the group's long-term decarbonization after 2030 will be planned and firmed up in the future.

The aforementioned actions address emission-relevant activities in various production areas of the group and cover both Scope 1 and Scope 2 emissions in the group's own operations, as well as relevant Scope 3 emissions. The construction and operation of the hydrogen-capable DR plant by Steel Europe is focused at one European site. However, other decarbonization levers are being implemented groupwide and globally.

Implementing the decarbonization levers of the transition plan requires CapEx and OpEx. The table below discloses the expenditure in the reporting year, together with an estimate of the likely future CapEx and OpEx.

In the reporting year, the use of renewable energy and the implementation of energy efficiency measures resulted in overall reductions of more than 150 kt CO_2e. Further reductions totaling around 2.8 million t $CO_{2.8}e$ are expected by fiscal year 2029 / 2030. The main effect will result from switching various process steps in steel production. Additional CO_2 reductions are expected especially from an adjustment of steel production volumes. In the reporting year, operating expenditure (OpEx) for implementing the transition plan was around €8 million, and capital expenditure (CapEx) around €104 million. The bulk of the capital expenditure – just under € million – went to the ongoing construction of the hydrogen-capable DR plant in Duisburg. For the period from fiscal year 2025 / 2026 to fiscal year 2029 / 2030, cumulated expenditure of around €1billion is envisaged for further implementation of all decarbonization measures in the transition plan.

At present, this expenditure is being financed from the company's own capital resources and public funding programs. In the future, sustainable financing instruments could be significant. For the company's investment in the hydrogen-capable DR plant, a CapEx plan was prepared in accordance with the EU Taxonomy. This is described in the relevant section.

The feasibility of the decarbonization levers depends in part on external factors such as regulatory requirements, the availability of renewable hydrogen and access to funding. Therefore, if conditions change, it may be necessary to take an adaptive management approach.

Metrics and targets

E1-4 – Targets related to climate change mitigation and adaptation

thyssenkrupp's GHG reduction targets are part of the groupwide decarbonization strategy and taken together are assessed by SBTi as being in accordance with the 1.5-degree Celsius target of the Paris Climate Agreement. The target system is aligned with the SBTi methodology and follows a cross-sector and sectoral decarbonization approach (SDA). The methodology is based on the IPCC's science-based climate scenarios (Intergovernmental Panel on Climate Change = IPCC) and on international and European reference frameworks such as the Paris Climate Agreement and the EU Green Deal. Stakeholder interests – especially legislative and capital market requirements – were also considered in formulating the targets.

Target types and scope of application

On account of its diverse business activities, thyssenkrupp deploys a combined target system of both absolute and relative GHG reduction targets with 2018 as the base year.

Absolute medium-term GHG reduction targets – groupwide outside the iron and steel SDA:

- **Scope 1 and 2 in t CO_2e:** reduction by 50.4% by 2030
- **Scope 3 in t CO_2e:** reduction by 30% by 2030

Relative medium-term GHG reduction target – within the boundary of the iron and steel SDA:

- **Scope 1 to 3 in t CO_2e per t of hot strip mill steel:** reduction by 30.1% by 2030

Absolute long-term GHG reduction targets – groupwide:

- **Scope 1 and 2 in t CO_2e:** reduction by 90% by 2050
- **Scope 3 in t CO_2e:** reduction by 90% by 2050

The overarching target is to achieve net zero emissions groupwide by 2050 in accordance with the SBTi Net Zero Standard. The GHG reduction targets were assessed by SBTi in the 2024 / 2025 reporting year. The intermediate and long-term targets for Scope 1 and 2 (2030 and 2050) were assessed to be in accordance with the 1.5-degree Celsius pathway. This also applies to the GHG emissions within the boundary of the iron and steel SDA. It does not apply to the separately assessed Scope 3 targets. The relative GHG reduction target within the boundary of the iron and steel SDA is assessed in accordance with the method specified by SBTi and includes defined steps of the steel production process. In the base year, around 90% of total Scope 1 and 2 emissions and around 1% of Scope 3 emissions were within the boundaries of the iron and steel SDA. The emissions covered are an aspect of the overarching emissions reporting and are included in the table in subsection "E1-6" and in the presentation of the base, actual and target values for the entire company in subsection "E1-1."

Target assumptions

The development of the GHG reduction targets is based on various assumptions. These include expected changes in volumes and market conditions, technological progress such as the ramp-up of hydrogen-based direct reduction, regulatory trends – such as those in the context of the EU emissions trading system and the Carbon Border Adjustment Mechanism (CBAM) – and changing customer requirements in respect of low-carbon products and processes. These factors affect the development of GHG emissions and the ability to implement the reduction pathways. Further information on these assumptions can be found in subsection "ESRS 2 SBM-3" in this section.

Moreover, a virtually constant steel scrap ratio is assumed in the GHG reduction target within the boundary of the iron and steel SDA. This requires that the ratio of scrap to primary material used must be included when calculating reduction pathways for steel producers. The scrap ratio determines the degree to which an undertaking's emissions intensity is aligned with the pathway for primary and secondary steel production. These factors affect the development of GHG emissions and the ability to implement the reduction pathways.

Actions to achieve the targets

thyssenkrupp applies several strategic decarbonization levers to achieve its GHG reduction targets. They include, in particular, the change in steel production technology, the adaptation of the product portfolio, the growing use of renewable energy – either purchased or generated by the company itself – and efficiency improvements in energy and production processes. Neutralization technologies to capture and store or use any unavoidable GHG emissions may be a complementary action in the long term. Further information on this can be found in subsection "E1-3."

Measuring and managing progress

The GHG reduction targets are monitored by way of the annual greenhouse gas balance sheet. The relevant data are recorded using a central ESG reporting system that is subject to regular internal auditing. Results and progress are published in the sustainability report.

E1-5 – Energy consumption and mix

For thyssenkrupp, energy consumption is a key area of action for the transition to a decarbonized economic system. The company's total energy consumption and the composition of the energy mix are disclosed below. The disclosures distinguish between non-renewable, renewable and nuclear sources and consider forms of energy generated by the company itself and purchased forms of energy.

ENERGY CONSUMPTION AND MIX

GWh	2024 / 2025
Fuel consumption from coal and coal products	53,212
Fuel consumption from crude oil and petroleum products	689
Fuel consumption from natural gas	6,771
Fuel consumption from other fossil sources	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	2,705
Total fossil energy consumption	**63,377**
Share of fossil sources in total energy consumption	98.7%
Consumption from nuclear sources[1)]	**140**
Share of consumption from nuclear sources in total energy consumption	0.2%
Fuel consumption for renewable sources, including biomass	26
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	622
The consumption of self-generated non-fuel renewable energy	27
Total renewable energy consumption	**675**
Share of renewable sources in total energy consumption	1.1%
Total energy consumption	**64,188**

[1)] Calculation based on country-specific shares of nuclear energy from 2020, weighted against the total energy consumption of the fiscal year 2024 / 2025.

ENERGY PRODUCTION

GWh	2024 / 2025
Non-renewable energy produced	5,433
Renewable energy produced	32
Total energy production	**5,465**

Energy intensity on the basis of sales

The calculation of energy intensity on the basis of sales reflects the consolidated energy consumption as a ratio of the group's consolidated net sales (MWh/€). The metric considers all thyssenkrupp's business activities because these were allocated to the relevant NACE sections in this connection and are considered as relevant in this context. In the reporting year, the energy intensity on the basis of sales amounted to 0.001954748 MWh / €.

It was calculated using the sales reported in the statement of income in the published consolidated financial statements.

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

The reported GHG emissions are calculated on the basis of the definitions and methodologies of the GHG Protocol Corporate Accounting and Reporting Standard and the other standards referenced therein for calculating GHG emissions from the company's own processes and from the upstream and downstream value chain. The following reporting of these GHG emissions is in line with the requirements of the CSRD and ESRS E1.

The scope of consolidation is the same as that used in financial reporting and considers the fully consolidated group companies. The Scope 1 and 2 emissions for HKM are calculated in line with the shareholding of 50%. By contrast, any supply volumes that exceed this shareholding are allocated as purchased goods to Scope 3.

To calculate the Scope 1 and 2 emissions, the energy consumption by energy source is determined at all relevant sites and suitable emission factors are applied. Some of the factors are obtained from the commercial Sphera database; other emission facts are calculated individually for the input volumes of coal and coke on the basis of the material stream analyses. The emissions of the greenhouse gases methane (CH_4), nitrous oxide (N_2O), partially halogenated hydrofluorocarbons (HFCs), sulfur hexafluoride (SF_6) and nitrogen trifluoride (NF_3) were determined by analysis; they are deemed to be not material to reporting and are therefore not disclosed. It should also be noted that the methodology for calculating some of the Scope 1 emissions relating to the volumes of coal and coke used changed between the base year and the reporting year. This results in an insignificant deviation in the data.

The reporting of Scope 2 emissions is both site-based and market-based. The site-based calculation applies the current average, country-specific IEA emission factors; the market-based calculation applies the emission factors contained in the various contractual instruments used. If no market-based emission factor is available for an energy component, the site-based emission factor is applied for this component in line with the GHG Protocol Scope 2 Guidance.

Scope 3 emissions for the various categories in the upstream and downstream value chain are calculated using activity- and expenditure-based data in line with the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. As a matter of principle, suitable emission factors from relevant and publicly available sources are used, for example, from international associations and from commercial databases. If available, supplier- and customer-specific data are also used in the calculation. Expenditure-based emission factors are adjusted for inflation. See subsection "BP-2" for information on the uncertainties associated with calculating the Scope 3 emissions. The material Scope 3 categories that therefore must be reported are determined on the basis of the criteria contained in the GHG Protocol. The underlying assumptions and calculation methods for the relevant categories are described below. At present, only small amounts of Scope 3 greenhouse gas emissions are calculated on the basis of inputs from certain activities in the upstream and downstream value chain. The proportion of primary data is less than 1% overall.

Scope 3, Category 1 "Purchased goods and services"

Indirect GHG emissions from purchased goods and services that are allocated to Category 1 in accordance with the GHG Protocol also include the upstream emissions reflected in the emission factors from Sphera and from industry associations such as the World Steel Association that are used. As a rule, the emissions of goods – especially materials – are calculated on the basis of weight. If no weight data are available, an averaging process is applied. In the case of goods for which it makes no sense to apply a weight-based approach or for purchased services, the calculation is based on expenditure with the application of suitable emission factors. If suppliers provide product-specific data, these are given preference in calculating emissions. In those cases where there is no information about the type of purchased goods or services, an extrapolation is performed using the averaging method on the basis of the purchase values to ensure the fullest possible recognition of emissions.

Scope 3, Category 3 "Fuel and energy-related activities"

The GHG emissions for the company's entire energy and fuel supplies that occur in the upstream value chain as the result of extraction, generation and transport – which are also the basis for the calculated Scope 1 and 2 emissions – are determined and disclosed with the aid of suitable emission factors from Sphera.

Scope 3, Category 4 "Upstream transportation and distribution"

Financial expenditure for transportation services is broken down by transportation type and the resulting GHG emissions are calculated on the basis of expenditure-based emission factors using the Scope 3 Evaluator tool from GHG Protocol, which is adjusted annually for inflation. If no data are available, a small proportion is extrapolated using the averaging method.

Scope 3, Category 5 "Waste generated in operations"

The indirect GHG emissions of waste are calculated from the waste volumes determined in the environmental data recording process, broken down by hazardous and non-hazardous waste that is either disposed of or recycled. This calculation uses emission factors from Sphera, which are based on various waste treatment methods, e.g., landfilling and disposal by incineration.

Scope 3, Category 6 "Business traveling"

Most of the indirect GHG emissions from business traveling relate to air travel. They are calculated mainly using primary data from the airlines that are delivered by a service provider. In addition, emissions from the use of other modes of transport and from hotel accommodation are determined using an averaging method and included in the total emissions for this category.

Scope 3, Category 10 "Processing of sold products"

In the case of sold products resulting from thyssenkrupp's various business activities, the typical processing steps until the use of the end product are examined and assessed in respect of the GHG emissions that occur. In the case of materials, components and semi-finished products, the breakdown is in line with the further stages of the trading chain and additional processing. If this usually involves assembly only, the emissions that occur are considered to be not material and are not reported. In line with section 6.4 of the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard, this also applies in those cases in which sufficient information is not available due to the large number of potential processing steps and end uses, and reliable assumptions are therefore not possible. However, if energy-intensive machine processing of intermediate products is involved, the GHG emissions are determined using typical energy consumption data, taking account of the product volumes delivered and local IEA emission factors for the energy supply. In the case of immaterial products, such as construction services in plant engineering, order-specific calculations are performed on the basis of the material volumes used in the construction of the respective plant.

Scope 3, Category 11 "Use of sold products"

In the case of sold products resulting from various business activities, the typical customer use types are examined and assessed in respect of the GHG emissions that occur. To start with, a distinction is made between whether the use of the product results in direct or indirect emissions. Direct emissions from product use – such as operation of the plant supplied or of a motor component – are measured and reported. In the case of plant engineering products supplied, the different periods of use that are expected for each plant type result particularly in high Scope 3 emissions. The time at which a plant is transferred to the customer determines the year to which the Scope 3 emissions are allocated. This may result in significant fluctuations between reporting years. The GHG emission of plants are calculated using order-specific assumptions for the service life, energy consumption and possible process emissions. These are then assessed using relevant emission factors such as those from the IEA or, if available, using project- and customer-specific emission factors. An assessment of the emissions for this category – deviating in one respect from the other plant engineering products supplied and from the base value presented – is conducted for the electrolysis plants sold. To facilitate a more realistic assessment of the emissions resulting from the use of electric power during the service life of these plants, we assume the ongoing decarbonization of the electricity mix in the countries where the plants are located on the basis of the IEA's Stated Policies Scenario (STEPS). Although this is a recognized scenario, it may be subject to inherent limitations if there is any change in the framework conditions. This adjustment to the method results in a reduction of around 50 million t CO_2e in the emissions presented for the electrolysis plants sold in the reporting year over their service life.

Other direct emissions reported in this category result from the energetic use by customers of the products traded and supplied by thyssenkrupp, such as coal, coking coal and steel mill gases. Due to contractual terms governing the protection of sensitive information in connection with defense projects, no emissions from the use of Marine Systems products are determined. Indirect emissions from the use of traded and supplied products – for example, materials and components – are not reported in this category.

Exclusion of non-material Scope 3 categories

Some Scope 3 categories are excluded from reporting because either no or only low GHG emissions were calculated. They include the following Scope 3 categories:

- Category 2 (Capital goods)
- Category 7 (Employee commuting)
- Category 8 (Upstream leased assets)
- Category 9 (Downstream transportation and distribution)
- Category 12 (End-of-life treatment of sold products)
- Category 13 (Downstream leased assets)
- Category 14 (Franchises)
- Category 15 (Investments)

Together, these Scope 3 categories account for only around 0.2% of overall GHG emissions.

GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

	Retrospective		Milestones and target years		
	Base year	Reporting year	Mid-term target	Long-term target	Annual % target / Base year
Mt CO_2e	2017 / 2018	2024 / 2025	2029 / 2030	2049 / 2050	
Scope 1 GHG emissions[1]					
Gross Scope 1 GHG emissions	24.2	19.8			
Gross Scope 1 GHG emissions from regulated emission trading schemes[2]	95%	100%			
Scope 2 GHG emissions[1]					
Gross location-based Scope 2 GHG emissions	0.9	1.1			
Gross market-based Scope 2 GHG emissions	1.1	1.2			
Subtotal Scope 1 and Scope 2 market-based[3]	**25.3**	**21.0**	**15.6**	**2.5**	**(3.2)%**
Scope 3 GHG emissions[1]					
Gross Scope 3 GHG emissions[3]	469.1	186.0	328.4	46.9	(2.5)%
1) Purchased goods and services	43.4	27.4			
3) Fuel and energy-related Activities	4.3	3.9			
4) Upstream transportation and distribution	0.8	0.6			
5) Waste generated in operations	0.2	0.2			
6) Business traveling	0.1	0.1			
10) Processing of sold products	2.8	0.8			
11) Use of sold products	417.5	152.9			
Total GHG emissions					
Total GHG emissions – location-based	494.2	206.8			
Total GHG emissions – market-based[3]	494.4	207.0	344.0	49.4	(2.5)%

[1] Biogenic Scope 1 gross GHG emissions amounting to 6 kt CO_2e are not included. For the calculation of Scope 2 and Scope 3 greenhouse gas emissions, no data were available for biogenic emissions.
[2] For the share of Scope 1 GHG gross emissions from regulated emissions trading schemes, the verified EU ETS emissions refer to the calendar year, while the total Scope 1 GHG gross emissions refer to thyssenkrupp's financial year. The coverage in the base year amounts to nine months, and in the reporting year, due to data availability, to three months.
[3] The targets refer to the consolidated absolute (outside SDA Iron & Steel) and relative (SDA Iron & Steel) GHG reduction targets.

Contractual instruments for the market-based calculation of Scope 2 GHG emissions

Of the contractual instruments that were used in the market-based calculation of Scope 2 emissions in this reporting year, 2% related to long-term power purchase agreements (PPA) and 11.6% to green electricity tariffs. A further 4% was accounted for by guarantees of origin (GO) and renewable energy certificates (REC). In addition, 72% related to other electricity, steam and heat supplies with known emission factors. The percentages relate to the amount of energy hedged by the respective instrument relative to the total amount of electricity, steam and heat purchased and used by the company itself.

GHG intensity on the basis of sales

The GHG intensity defines the ratio of total GHG emissions to sales (t CO_2e / €). It is reported in respect of both sites and markets. In the reporting year, the site-based GHG intensity amounted to 0.006299083 t CO_2e / €, whereas the market-based GHG intensity was 0.006303086 t CO_2e / €.

These figures were calculated using the sales reported in the statement of income in the published consolidated financial statements.

E1-8 – Internal carbon pricing

For those businesses that are subject to the European Emission Trading Scheme (EU-ETS), thyssenkrupp applies an internal carbon price for the economic assessment of planned investments. This shadow carbon price ensures the systematic consideration of future carbon cost risks in long-term capital allocation decisions, especially for infrastructure and plant replacement projects.

The assumed carbon price is in a corridor between the current market price and around €150/t CO_2 through 2035 and around €250/t CO_2 through 2045. thyssenkrupp is thus guided by the customary market assumptions contained in leading scenario models and regulatory developments at the EU level – such as Fit for 55, CBAM and ETS II – especially in respect of the anticipated development of carbon prices, emission reduction pathways, sectoral decarbonization targets and adaptations in the cross-border trade with carbon-intensive products.

One key example of an application is the investment in a hydrogen-capable DR plant with smelter by Steel Europe at the Duisburg site. In the future, this will replace the coke-fired blast furnace. The use of natural gas or hydrogen will reduce carbon emissions by as much as 3.5 million tons each year. The internal carbon price was included as a key parameter in calculating the economic efficiency of this investment.

In the reporting period, the shadow carbon price potentially covered approximately 16 million t CO_2e of gross Scope 1 GHG emissions, equivalent to 82% of total gross Scope 1 GHG emissions.

ESRS E2 Pollution

This subsection discusses the impact of thyssenkrupp's operations on pollution. The goal is to disclose how the emissions of pollutants into the air, water and soil are recorded and managed and what strategies and actions are in place within the company to prevent and mitigate these emissions.

Strategy

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The tables below explain the material impacts, risks and opportunities in connection with pollution that were identified by the materiality assessment performed and are significant to thyssenkrupp's operations and business model.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO POLLUTION

Topic	Category[1]	Description	VC[2]	TH[3]
Air pollution	I (-)	The emission of air pollutants (including unintended emissions) has a detrimental effect on air quality, which may have a negative impact on the environment and human health.	U, Op, D	S, M
Water pollution	I (-)	The emission of water pollutants may have a detrimental effect on ecosystems and water resources, thus endangering the environment and human health.	U, Op	S, M
Soil pollution	I (-)	Soil pollution – for example, caused by incorrect waste disposal – may have a detrimental effect on soil quality and the associated ecosystems and may endanger human health if it enters the food chain or as the result of direct soil contact.	U, Op	S, M

[1] I = impact; (-) = negative; (+) = positive; R = risk; O = opportunity
[2] VC = value chain; U = upstream; Op = own operations; D = downstream
[3] TH = time horizon; S = short-term; M = medium-term; L = long-term

Impact, risk and opportunity management

E2-1 – Policies related to pollution

The policies described below concern issues related to pollution that results or may result from our own operation or operations in the upstream and downstream value chain. They include preventing and reducing air, water and soil pollution, ensuring the proper handling of hazardous substances and waste, and preventing incidents and emergency situations in connection with mitigating and limiting the impacts on society and the environment.

Environmental and energy management

The group environmental and energy management policy defines binding requirements for managing environmentally relevant activities – including the reduction of emissions to the air, water and soil, the consideration of environmental aspects in the product life cycle and the handling of incidents and emergency situations.

ENVIRONMENTAL AND ENERGY MANAGEMENT

Category	Description
Content of the policy	Implementation of an operational environmental and energy management system in support of the environmental and energy policy Implementation and monitoring of environmental and energy management systems Support for environmental objectives and the continuous improvement of environmental performance
Scope	thyssenkrupp group On a case-by-case basis, investments (minority interests, 50 / 50 joint ventures) Contractually involved third parties (e.g., contract workers, external service providers)
Level of responsibility	Head of Sustainability
External reference framework	ISO 14001 ISO 50001
Stakeholder information	Environmental and energy policy publicly accessible via the company's website Internal policies accessible to employees via the company's intranet
Applied in the report	E2, E5

With its environmental and energy policy, thyssenkrupp is pursuing the goal of minimizing negative impacts on the environment – either as the result of the company's own activities or in part due to the downstream value chain – and using energy and resources as efficiently as possible. To this end, a group policy was developed, which governs the organization and control of the company's environmental and energy management. This policy defines central structures, responsibilities and minimum standards for internal procedures.

One main element of the policy is the classification of group companies as environmentally relevant or energy-relevant on the basis of objective criteria such as the existence of official environmental requirements or reporting obligations to environmental authorities, external reviews and material energy consumption data. All companies classified as relevant must implement an environmental and/or energy management system in accordance with ISO 14001 and ISO 50001, respectively. According to the group policy, the management systems must cover all environmentally relevant and energy-relevant activities of the respective company.

Pollutant emissions to the air that are a relevant environmental aspect of a business activity must be considered within the context of the environmental and/or energy management system and managed systematically so that negative environmental impacts can be identified, monitored and addressed internally. Moreover, energy management systems serve to record and optimize energy-intensive processes, which are often directly associated with airborne emissions (i.e., from incineration processes), and can thus contribute to mitigating air pollution and its environmental impacts.

Environmental and energy management addresses the downstream value chain by considering the environmental aspects of products and services throughout their life cycle – including use and disposal – from the outset. This requirement is a central feature of thyssenkrupp's environmental and energy policy. For this reason, environmental and energy-related matters must be considered systematically in the early stages of planning and in the product development process. The goal of this requirement is also to prevent or mitigate those environmental impacts associated with the use of products or services, such as those caused by air pollution that may occur when disposing of products.

At thyssenkrupp, the environment and energy management systems are monitored on the basis of regular management assessments in accordance with ISO 14001 and ISO 50001, respectively. A documented management assessment signed by the executive management is deemed to be verification of implementation. Moreover, environmental and energy-relevant data are recorded and assessed at least once annually in order to gauge the level of performance and continuous improvement of the systems.

Another element of the group environmental and energy management policy is the prevention of and crisis management for incidents and emergency situations. These include events with potentially severe consequences for society and the environment, legal risks or business interruptions, including those affecting thyssenkrupp's contractual partners. The primary goal is to prevent such incidents and situations by way of early risk detection in conjunction with suitable preventive actions. Should an incident or emergency situation occur nonetheless, the aim is to effectively limit the impacts on society, the environment and operations.

Human rights and environmental due diligence obligations

The policy for human rights and environmental due diligence obligations is anchored in various thyssenkrupp documents such as the principles on human rights and environmental due diligence obligations, the group policy for implementing human rights and environmental due diligence obligations, the Supplier Code of Conduct and the Group Policy Procurement Principles.

Based on the principles of compliance with human rights and environmental due diligence obligations, the group and its upstream value chain undertake to comply with international environmental treaties, especially relating to the control of hazardous substances and the avoidance of transboundary movements of pollutants.

HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE OBLIGATIONS

Category	Description
Content of the policy	As part of this policy, thyssenkrupp makes an express commitment to respecting human rights and categorically rejects child labor and all forms of forced labor, including trafficking in human beings. We are also committed to making responsible use of natural resources and to preventing and minimizing negative environmental impacts within this scope.
Scope	thyssenkrupp group (employees, managers and members of the Executive Board and management teams) On a case-by-case basis, investments (minority interests, 50 / 50 joint ventures) Contractually involved third parties (e.g., non-employees, external service providers) Upstream supply chain (suppliers and their suppliers)
Level of responsibility	SCA Council Group
External reference framework	UN Global Compact International Bill of Human Rights of the United Nations Core Labor Standards of the International Labour Organization (ILO) International agreements concerning civil, political, economic, social and cultural rights Paris Climate Agreement Stockholm Convention on Persistent Organic Pollutants Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal Minamata Convention on Mercury OECD and UN anti-corruption guidelines
Stakeholder information	Parts of the policy can be accessed on the company's website and by employees on the intranet.
Applied in the report	E2, E3, E5, S1-S3

By implementing human rights and environmental due diligence obligations through systematic risk analyses and control measures, thyssenkrupp aims to prevent, mitigate or remedy pollution caused by its own business activities or by activities in the supply chain and to minimize the resulting risks to society and the environment. The basis for this are the groupwide principles in which these obligations are anchored and which are aimed at ensuring compliance with applicable environmental legislation and relevant international treaties such as the Basel, Stockholm and Minamata Conventions. These aim to prevent the transboundary movement of hazardous waste (Basel), the placing on the market and release of persistent organic pollutants (Stockholm) and the release and use of mercury and mercury compounds (Minamata). They establish internationally recognized standards for protecting the environment and health.

In the context of these obligations, both actual and potential adverse environmental impacts – e.g., caused by air pollution, soil contamination or the improper handling of hazardous substances – are considered systematically. Adverse environmental effects that could jeopardize protected legal rights – such as the right to health, food and clean water – must be avoided. Any impacts that actually occur must be mitigated or remedied systematically within the context of corporate responsibility. As an integral part of due diligence obligations, the Supplier Code of Conduct gives substance to these expectations for all thyssenkrupp's suppliers and their subcontractors by requiring their compliance with international environmental treaties such as the Basel, Stockholm and Minamata Conventions.

Water management plan of thyssenkrupp Steel Europe AG

A local water management plan at the Duisburg-Nord site of thyssenkrupp Steel Europe AG complements the policy with requirements for wastewater treatment and takes account of possible upstream environmental impacts associated with the cooperation with key water suppliers such as Gelsenwasser AG.

WATER MANAGEMENT PLAN OF THYSSENKRUPP STEEL EUROPE AG

Category	Description
Content of the policy	Water management strategy for efficient water use and reuse Wastewater treatment and cooperation with the Emschergenossenschaft in respect of environmentally compatible treatment Compliance with statutory requirements and monitoring of water levels, including groundwater monitoring
Scope	thyssenkrupp Steel Europe AG – Duisburg-Nord plant
Level of responsibility	Executive Board of thyssenkrupp Steel Europe AG
External reference framework	ResponsibleSteel
Stakeholder information	Water management plan accessible via the company's website
Applied in the report	E2, E5

The water management plan of thyssenkrupp Steel Europe AG at the Duisburg-Nord site aims to ensure the efficient use of water and the effective prevention, mitigation and remediation of pollutant emissions into surface waters – especially in connection with industrial wastewater – in order to minimize environmental and health risks. The focus is on protecting water quality, preserving aquatic ecosystems and preventing negative impacts on human health.

Wastewater management by thyssenkrupp Steel Europe AG at the Duisburg-Nord site is based on the principle of minimizing pollutants prior to discharge. Industrial and process wastewater is treated in accordance with the requirements of Germany's Water Resources Act (WHG), the Water Act of the State of North Rhine-Westphalia (LWG NRW) and official permits. Depending on its type and quality, wastewater is either discharged indirectly via the Emschergenossenschaft or directly into the Rhine.

The water management plan also considers the upstream value chain, especially the cooperation with Gelsenwasser AG as thyssenkrupp's main water supplier. This organization's water withdrawals require permits and monitoring and are an element of site-related water management, which aims to ensure the stability of local water resources. As an integrated element of water management, this is intended to contribute to preventing or reducing water-related environmental and health risks, especially in connection with the quality and pollution load of the water that has been used and discharged.

The water management plan aims to continuously improve the efficient use of water and the careful management of this resource. In this connection, the associated management processes and performance indicators are reviewed regularly. A further contribution to the continuous improvement in water use is expected from the dialog with other industrial users of water under the auspices of the Emschergenossenschaft.

E2-2 – Actions and resources related to pollution

The following disclosures describe the actions taken by thyssenkrupp and the resources made available to implement the policies for preventing, mitigating and remedying pollution that are described in subsection "E2-1."

Environmental and energy management

In order to implement the group environmental and energy management policy, the environmentally relevant and energy-relevant thyssenkrupp companies operate decentralized management systems in accordance with ISO 14001 and ISO 50001, respectively. These systems serve to manage environmentally relevant activities and improve the environmental performance and energy efficiency of processes and products.

One example of this in the Steel Europe segment is the integrated approach to air pollution control, soil protection and noise reduction. Production plants are equipped with waste gas purification systems controlled by a digital emission monitoring system. The data measured by this system are transmitted to the responsible authorities. To protect the soil, environmentally relevant aspects are already considered in the planning phase for new plants, as envisaged by

statutory requirements. The soil protection measures are complemented by plant technology solutions and internal procedures for the responsible handling of potentially hazardous substances. Certain areas of the Duisburg site are vacant or covered with vegetation and must be maintained in accordance with environmental aspects with the aim of preserving soil function and preventing or mitigating erosion, compaction or pollution. Decommissioned landfills are renatured with the aim of improving soil quality, while greened earthen walls serve to control both emissions and noise.

The other thyssenkrupp businesses also implement actions to prevent and mitigate air and soil emissions as part of the environmental and energy management system. Activated carbon filters can be installed in metal-forming pressing processes to capture oil mists and the resulting decomposition products; in pickling units, alkaline air scrubbers are used to reduce acid and pickling vapors. At relevant sites, emissions are also being reduced by the increased use of electric-powered mobile machinery such as diggers and transport vehicles, which avoid the emission of exhaust gases caused by the combustion of fossil fuels. In addition, fabric filter systems can be installed in metallurgical flame-cutting units to reduce emissions. As prescribed by the authorities, the emissions from combined heat and power plants are measured regularly to monitor compliance with the relevant thresholds. In addition, waste gas treatment processes can be used to reduce emissions.

Moreover, certain technical and organizational measures serve specifically to protect the soil. These measures include systems that comply with Germany's Ordinance on Installations for Handling Substances Hazardous to Water (AwSV) such as gas stations or oil storage depots designed to prevent fuel-contaminated water from entering the soil or sewage system. Moreover, paved surfaces with separators are deployed at washing stations to mitigate the risk that any fuel adhering to the object being washed enters the ground. In addition, the proper collection of waste in labeled containers – coupled with proper disposal – is intended to prevent waste from entering the environment. Alarm and contingency plans are also available, which are supported by the site fire department and are intended to facilitate a rapid response in the event of an incident.

The examples outlined above are operational environmental and energy management actions that are implemented decentrally and adapted to the situation at the respective site. At the policy level, the central actions are the classification of thyssenkrupp companies as environmentally relevant or energy-relevant and the obligatory introduction of corresponding management systems. No further policy steps are planned at present.

In the energy management area, the GEEP has been created as an instrument to define targets for reducing energy consumption and consolidate actions to optimize processes, utilize waste heat and modernize technical installations. In the 2024 / 2025 reporting year, around 162 GWh were saved by GEEP, which is equivalent to the avoidance of around 75 kt CO_2e. Further efficiency gains of at least 110 GWh are planned for fiscal year 2025 / 2026. Improving energy efficiency may not only contribute to mitigating GHG gases but also cut emissions of airborne pollutants such as nitrogen oxides, sulfur dioxide and particulate matter in relation to fossil fuels.

Human rights and environmental due diligence obligations

For the implementation of human rights and environmental due diligence obligations, thyssenkrupp has established a process that considers both its own business activities and those of its direct and indirect suppliers. The main tool for this is the risk analysis – both annual and ad hoc – that is performed using a standardized process. The risk assessment for our own company is based on a structured self-disclosure process. In the analysis of the supply chain, external risk indices, geographical and industry-specific factors and additional findings (e.g., from audits) are used to identify site- and supplier-specific risks. An ad hoc analysis must be performed if justified reports are received of risks at indirect suppliers.

If the risk analysis identifies human rights or environmental risks, appropriate preventive action must be initiated. This ranges from the contractual specification of training and awareness actions through to auditing and certification. The appropriate preventive action is selected on a risk basis from a groupwide catalog. The effectiveness of the actions must also be documented and reviewed regularly.

In the event of actual or imminent violations, remedial action must be taken without delay. Such action includes supplier declarations, action plans and – in the case of severe or non-remediable violations – the phased termination of a business relationship. However, priority is given to the principle of enablement over termination. This means that a business relationship should only be terminated if less severe remedies are not effective or not available. Remedial action must always be documented and monitored.

The process to implement human rights and environmental due diligence obligations is anchored in thyssenkrupp's governance structure. Reports received via channels such as the whistleblower system are recorded and assessed systematically; if necessary, they are included in the risk analysis.

At the policy level, the central action in implementing human rights and environmental due diligence obligations is regular risk analysis, coupled with the initiation of needs-based preventive, mitigating and remedial action. No further policy steps are planned at present.

Water management plan of thyssenkrupp Steel Europe AG

The water management plan of thyssenkrupp Steel Europe AG at the Duisburg-Nord site includes measures aimed at avoiding or reducing the discharge of pollutants into surface waters and the associated environmental and health risks. The measures can be divided into three main categories:

Technical and operational measures to avoid and treat wastewater

The focus is on closed water circulation systems in which process waster is reused, thus reducing the volume of wastewater. As a rule, this not only cuts the volume of water discharged but also, depending on the composition and level of treatment, the impact on the receiving waters. The wastewater from production processes goes through a multistage treatment process to improve its quality. Depending on its type and composition, the treated wastewater is either discharged indirectly via the Emschergenossenschaft or, after appropriate treatment, directly into the Rhine. The discharge points are also subject to continuous monitoring by the company; in addition, the authorities perform regular controls.

In addition, existing site installations are being optimized by way of technical modernization in order to improve wastewater quality. Moreover, the water management plan in accordance with water regulations specifies that the site's sewers are inspected regularly by specialist companies. Any findings must be documented so that the sewers can be remediated if necessary. The goal is to identify and remedy any leaks, the ingress of water from other sources or potential backwater effects at an early stage to support the treatment and discharge of the wastewater in accordance with regulations and reduce the risk of unintentional contamination.

The company's own polder system, which protects vulnerable installations such as the hot strip mill against increased groundwater levels, forms part of the overall water management concept and contributes indirectly to stabilizing the drainage and wastewater systems. This reduces potential backwater effects and infrastructure-related risks in connection with wastewater discharges. As a result, it is also possible to reduce the risks of an unintentional build-up of backwater, leaks and overflows, which may also cause a discharge of contaminated water.

Technical safeguards and organizational measures

The water protection system at the Duisburg-Nord site ensures the safe handling of substances that are hazardous to water quality through the use of technical safeguards such as collection basins, double-walled plant components and systematic leak testing. In addition, all employees who work with such substances receive regular training in accordance with statutory requirements. The goal is to foster safe and environmentally compatible behavior in day-to-day operations, minimize potential sources of error and enable appropriate reactions in the event of an incident.

Risk assessment and collaborations

As a further risk prevention measure, the water management plan also specifies the regular assessment of potential risks from flooding and intense rain events on the basis of official hazard maps and in collaboration with the Emschergenossenschaft. These assessments are intended to avoid overloading the drainage system and prevent the associated risks of unintentional wastewater discharges. In addition, regular dialog with other commercial water consumers within the Emschergenossenschaft is aimed at supporting the resource-efficient use of water. This dialog aims to develop joint solutions for the efficient use of available water resources, such as restricting wastewater volumes and potential contamination.

The actions described are the operational elements of the water management plan and are implemented as part of the water protection system at the Duisburg-Nord site. At the aggregated level, they also serve as the policy implementation action. No further policy actions are planned at present.

Metrics and targets

E2-3 – Targets related to pollution

To date, no groupwide quantified targets related to pollution have been defined within the meaning of ESRS E2. Due to thyssenkrupp's heterogeneous business activities and the resulting differences in relevance, risk exposure and regulatory requirements, operational environmental protection is managed mainly at the level of the organizational units. Some of the environmental plans are segment-specific, such as the water management plan of thyssenkrupp Steel Europe AG.

Despite the lack of quantitative targets, the effectiveness of existing pollution policies and actions is monitored via management systems, internal audits, external certification in accordance with ISO 14001 and ISO 50001 and site-specific risk and compliance processes. The environmental performance is measured using qualitative and quantitative indicators, among other things. These include environmental indicators such as wastewater quality, waste volumes and pollutant emissions. In addition, audit findings can be used as indicators of compliance with statutory thresholds or the effectiveness of emission mitigation actions. The benchmark is the starting situation for the respective site or organizational unit.

E2-4 – Pollution of air, water and soil

In the context of this disclosure requirement, thyssenkrupp reports the substance-related emissions from its own operations with the goal of achieving transparency regarding the discharge of these substances into the air, water and soil. This reporting takes place on a consolidated basis and covers those installations under the financial or operational control of the company and emissions of the substances listed in Annex II of Regulation (EC) No 166/2006 concerning the establishment of a European Pollutant Release and Transfer Register (E-PRTR) if the thresholds defined therein are exceeded.

EMISSIONS TO AIR, WATER, AND SOIL

	2024 / 2025		
Substance-specific emissions in kilograms	to air	to water	to soil
Carbon monoxide (CO)	185,229,625		
Non-methane volatile organic compounds (NMVOC)	349,656		
Nitrogen oxides (NO_x/NO_2)	9,878,717		
Sulphur oxides (SO_x/SO_2)	11,581,817		
Arsenic and compounds (as As)		14	
Chromium and compounds (as Cr)	9,045	100	
Copper and compounds (as Cu)	1,103	672	
Nickel and compounds (as Ni)	2,301	80	
Lead and compounds (as Pb)	3,303	69	
Zinc and compounds (as Zn)	13,527	2,716	
PCDD + PCDF (dioxins + furans) (as Teq)[1)]	0		
Benzene	2,041		
Polycyclic aromatic hydrocarbons (PAHs)	4,633		
Total organic carbon (TOC) (as total C or COD/3)		82,403	
Chlorine and inorganic compounds (as HCl)	61,966		
Cyanides (as total CN)		86	
Fluorides (as total F)		37,870	
Particulate matter (PM_{10})	7,845,340		

[1)] In the reporting year, substance-related emissions into the air amounted to approximately 0.0009 kilograms.

Emissions from installations which are used to produce steel and are already subject to the E-PRTR are mainly determined by direct measurement. As the final E-PRTR data were not yet available when the CSRD reporting was prepared, extrapolation was used for quantification. The emissions are calculated using a simplified extrapolation method. To start with, current production volumes are estimated on the basis of progress values over time. The emissions are then derived using a combination of historical benchmarks and values adjusted to reflect the estimated development of production. This results in a consolidated emission volume for these installations for the reporting period.

The emissions for the other installations that are within the scope of this disclosure requirement are estimated using a model-based approach. Relevant emission sources (the use of fuels and chemicals, manufacturing processes, wastewater volumes) are recorded on the basis of consumption and activity data and processed using standardized emission and reduction factors. In those cases where no site-specific data are available, published values and industry-related emission factors are used. The calculation also takes account of mitigation using filtration and treatment technologies such as selective catalytic reduction (SCR), wastewater treatment and waste oil incineration.

The data are based on direct measurements (for steel production installations subject to the E-PRTR) and on calculated values for installations that are operated by other businesses and whose emissions are not measured directly. Extrapolations and estimates are used to facilitate consolidated and timely information. They are based on E-PRTR reporting, internal production data and external emission factors. A degree of uncertainty results from, for example, the assumptions used in extrapolating the production data and the use of standard factors in modeling. The scale of this uncertainty depends on the reference sources consulted.

Lastly, in connection with this disclosure requirement, it should be noted that the term “installation” is not defined in ESRS E2-4 and may therefore be specific to a given report. This means that the system boundaries applied in the report may deviate from the legal definition of installations in accordance with E-PRTR, which may result in differences in the respective reported emission values.

E2-6 – Anticipated financial effects from pollution-related risks and opportunities

In the reporting year, there were no major environmental incidents or deposits within the meaning of ESRS E2 (see Annex A of Regulation (EU) 2023/2772). An environmental incident is a sudden incident caused by people that interrupts operations or the supply chain and is associated with the release of substances, vibrations, heat, noise, odors or other emissions into the air, water or soil. A deposit is an accumulation of substances in the environment that may be caused by regular operations, incidents or disposal processes. As no such incidents or deposits occurred in the reporting year, there was no related capital or operating expenditure.

ESRS E3 Water and marine resources

This subsection discusses the impact of thyssenkrupp’s operations on water and marine resources and the resulting risks for thyssenkrupp. The goal is to disclose how water withdrawals, use and discharges are recorded, how the associated impacts on the availability and quality of water are assessed and what strategies and actions are in place within the company to foster the sustainable use of water and marine resources.

Strategy

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The table below explains the material impacts, risks and opportunities relating to water and marine resources that were identified by the materiality assessment performed and are significant to thyssenkrupp’s operations and business model.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO WATER AND MARINE RESOURCES

Topic	Category[1]	Description	VC[2]	TH[3]
Water consumption	I (-)	Excessive water consumption contributes to a detrimental effect on local water availability, water cycles and adjacent ecosystems and may result in negative impacts on biodiversity, agricultural use and the supply of drinking water to local communities.	Op	S, M
	R	If the availability of water is restricted or water levels are low, water-dependent processes – including the use of waterways for transportation and logistics – represent a risk to business continuity at thyssenkrupp.	Op	/
Water withdrawal	I (-)	Excessive water withdrawals may have long-term detrimental effects on ecosystems and their regenerative capacity, restricting the availability of natural resources on which the local communities depend for their livelihood and cultural heritage.	Op	S, M
	R	If the water resources required for operations are restricted, water-dependent production processes represent a risk to business continuity at thyssenkrupp.	Op	/
Water discharge	I (-)	The discharge of polluted or thermally modified water into surface waters may have a detrimental effect on water quality, resulting in negative impacts on adjacent ecosystems and human health.	Op	S, M

[1] I = impact; (-) = negative; (+) = positive; R = risk; O = opportunity
[2] VC = value chain; U = upstream; Op = own operations; D = downstream
[3] TH = time horizon; S = short-term; M = medium-term; L = long-term

Impact, risk and opportunity management

E3-1 – Policies related to water and marine resources

The policies presented below in connection with this disclosure requirement address matters relating to water in the company's own operations, including the procurement and use of water, wastewater treatment as an element of sustainable water use and the prevention or mitigation of water pollution. The water management plan at the Duisburg-Nord site includes, in particular, a closed loop for process water and multistage wastewater treatment. Marine resources are not an explicit component of these policies, but are not explicitly excluded either.

The systematic inclusion of water-related aspects in product and service design is currently not part of the policies discussed in connection with this disclosure requirement. However, topics like these are addressed individually in other group policies such as the environmental and energy policy or product life cycle management policy. There is currently no separate group policy on integrating water-related requirements in product and service design.

Human rights and environmental due diligence obligations, which cover thyssenkrupp's own operations and those of its direct and indirect suppliers, require the avoidance of excessive water consumption, also in water risk regions. At present, there is no explicit inclusion of downstream stages in the value chain.

There are currently no sites in areas of high water stress that are not covered by a corresponding policy. There are no separate corporate policies specifically for these regions. However, the due diligence obligations and business continuity management apply groupwide and also cover sites in water risk regions.

There is currently no specific corporate policy on protecting the marine ecosystem.

Human rights and environmental due diligence obligations

In the context of human rights and environmental due diligence obligations, thyssenkrupp considers the potential negative impacts on water resources and aquatic ecosystems, including those that could result from excessive water consumption or from disproportionate water withdrawals in the context of the company's own business activities. The use of large quantities of water – especially at sites in regions at risk from water stress – may result in the overexploitation of local resources, intensify conflicts between user groups and have a negative impact on the resilience of water-dependent ecosystems. In addition, the restricted availability of water may endanger the security of supply to neighboring communities – for example, in respect of their access to drinking water, agricultural use and other material provisioning services. Moreover, excessive water withdrawals harbor the risk of hydrological imbalances, the loss of habitat and long-term disruptions to environmental functions.

One goal of these due diligence obligations is to avoid excessive interventions in natural water resources, maintain the ecological integrity of water resources and ensure that there is no risk to the long-term availability of water for the environment and society. In order to prevent, mitigate and remedy such impacts, thyssenkrupp's group policy obliges all its own establishments to comply with water-related environmental requirements, both national and international. At the same time, the water-related aspects described are integrated in the company's risk management systems, which have the goal of prevention, remedial action and the continuous monitoring of effectiveness.

Further information on human rights and environmental due diligence obligations can be found in subsection "E2-1."

Business continuity management

With its groupwide business continuity management, thyssenkrupp takes a preventive approach to ensure that defined actions can be implemented to restart operations as quickly as possible in the event of failure or damage – for example, in the case of water-dependent processes such as the use of waterways for transport and logistics. The goal is to identify relevant risks at an early stage and to effectively mitigate their impacts should they arise. In this context, risks are considered that could restrict the availability of water – for example, as the result of local water scarcity or technical failure of the water supply infrastructure. These may impair the function of water-dependent processes and result in the disruption of production activities in regions at risk from water stress.

BUSINESS CONTINUITY MANAGEMENT

Category	Description
Content of the policy	Ensuring operational capability in the event of unforeseen events, especially supply bottlenecks Performance of risk assessments to identify critical input factors and processes Development of contingency plans to maintain operating ability
Scope	thyssenkrupp group On a case-by-case basis, investments (minority interests, 50 / 50 joint ventures) Contractually involved third parties (e.g., contract workers, external service providers)
Level of responsibility	Head of Group Finance
External reference framework	–
Stakeholder information	Internal policies accessible to employees via the internal document platform
Applied in the report	E3

In order to effectively manage business continuity, all group companies are required to prepare a business continuity plan (BCP) in accordance with a groupwide procedure. Any existing plans must comply with the minimum standards specified in this procedure. The management of the group companies appoint members of their operational management teams to hold responsibility for this and require that their respective BCPs are reviewed and updated if necessary.

Water management plan of thyssenkrupp Steel Europe AG

At the Duisburg-Nord site, thyssenkrupp Steel Europe AG has implemented a water management plan aimed at ensuring the efficient use of water and at preventing, mitigating and remedying any potential negative impacts on aquatic ecosystems and society that might be caused by pollution due to industrial wastewater discharges. The water management plan is based on the requirements contained in permits in accordance with water regulations and includes quality-controlled processes for wastewater treatment prior to discharge into the Rhine.

The concept applies specifically at the Duisburg-Nord site. Developed in close consultation with the relevant authorities and water institutes, it takes account of technical conditions at the site and regional requirements relating to the water infrastructure. The focus is on protecting aquatic habitats and avoiding potential risks to the environment and human health due to pollution.

Further information on the water management plan can be found in subsection “E2-1.”

E3-2 – Actions and resources related to water and marine resources

The following disclosures describe the actions taken by thyssenkrupp and the resources made available to implement the policies described in subsection “E3-1” concerning the sustainable procurement and use of water, the treatment of wastewater in the context of sustainable water use and the prevention and mitigation of water pollution.

Human rights and environmental due diligence obligations

In the context of its human rights and environmental due diligence obligations, thyssenkrupp systematically identifies and assesses potential adverse impacts on society and the environment, including water resources and aquatic ecosystems, that could be caused by the company's own operations. The assessment is performed on the basis of defined risk criteria and uses a standardized risk identification process.

If risks are identified, priority should be given to initiating preventive actions. In the event of incidents with relevant impacts, mitigation and clean-up actions must be implemented. Depending on the type of impact, suitable remedial action must also be initiated. It must be implemented on the basis of internal regulations that are applicable groupwide. Further information on human rights and environmental due diligence obligations can be found in subsection "E2-2."

Business continuity management

The business continuity plan is the central instrument of business continuity management. Development of the plan requires the identification of site-related critical resources such as equipment, consumables (including water) and essential services, the limited supply of which could impair business processes. As a way of hedging supply risks, the process requires thyssenkrupp group companies to perform preventive risk assessments, also for water-dependent processes.

If these site-specific assessments reveal the high criticality of water-dependent processes, suitable mitigation actions must be implemented. These include alternative supply strategies such as an emergency water supply, hedging clauses in contracts with external water suppliers, investment in production technologies that use less water, and technical and organizational efficiency measures to reduce water consumption. These actions should be implemented on a risk basis at sites with identified water-related risks, such as increased water stress.

The risk analysis and the development of a business continuity plan are the central measures in managing business continuity. No further policy steps are planned at present.

Water management plan

The water management plan of thyssenkrupp Steel Europe AG at the Duisburg-Nord site includes measures to reduce freshwater consumption, cut wastewater volumes, treat wastewater and monitor wastewater quality. In particular, the closed loop for process water serves to reduce freshwater and wastewater volumes. Multistage purification processes are used to treat wastewater before it is transferred for discharge. Wastewater quality should be monitored by regular analysis in the context of thyssenkrupp's own monitoring measures and testing by the authorities. Further information on the water management plan can be found in subsection "E2-2."

Metrics and targets

E3-3 – Targets related to water and marine resources

To date, thyssenkrupp has not defined any groupwide quantitative targets related to water management within the meaning of ESRS E3. This is because the individual water-related risks and actions are very site-specific and any heterogeneity within the company is related to certain industries and products. Instead of setting general targets, thyssenkrupp has taken a decentralized management approach on the basis of site-specific programs like the integrated environmental management systems or specific regulations such as the water management plan of thyssenkrupp Steel Europe AG.

Nevertheless, the effectiveness of water-related policies and actions is subject to needs-based monitoring. In the context of the water management plan at the Duisburg-Nord site, this is done by monitoring water withdrawals, water levels and wastewater quality. The contingency plan for water-dependent processes is regularly reviewed in the context of business continuity management. Human rights and environmental due diligence obligations are implemented via established risk and control processes, including site and supply chain assessments and the monitoring of the measures initiated.

E3-4 – Water consumption

In connection with this disclosure requirement, thyssenkrupp publishes information on the water consumption of its own operations. The goal is to establish an understanding of the scope of and trends in water consumption. In addition to total water consumption, the disclosure covers consumption in regions with water risks, the volume of recycled and reused water and information on stored water volumes. The company's water intensity is also disclosed. The supply sources, abstraction points and transfer and discharge locations are reported separately to provide transparency as to the origin and destination of water streams.

WATER MANAGEMENT INDICATORS

m³	2024 / 2025
Water purchases and withdrawals	**292,315,523**
thereof water purchases from third parties	6,136,546
thereof withdrawals from fresh surface water	273,114,737
thereof withdrawals from saline surface water	0
thereof withdrawals from groundwater	13,044,483
Water discharges	**277,878,656**
thereof discharges to third parties	17,394,988
thereof discharges to fresh surface water	259,664,202
thereof discharges to saline surface water	577,678
thereof discharges to groundwater	222,038
Water consumption	**14,436,867**
thereof in areas at water risk	373,503
Water recycled and reused	**952,715,542**
Water stored	**1,131,764**
Water intensity (in m³ / sales in € million)	**440**

The water consumption data are recorded using various methods including direct measurement (38%), calculations based on operating parameters (21%), modeling (9%), estimates(20%) and invoice data (12%). The figures provided represent the respective proportion of total water consumption. Additionally, the assumptions, databases and standards used in estimates and calculations are documented. Stored water volumes are measured at the end of the respective fiscal year.

Water quantity and quality in the relevant catchment areas are assessed on the basis of a site-related analysis. The assessment of water quantity is based on water stress, defined as the ratio of total water demand to available renewable water resources. This is used to assign sites to risk categories ranging from very low to very high. By contrast, water quality is assessed on the basis of the biological oxygen demand (BOD). This indicator measures the oxygen required by microorganisms to break down organic substances in fresh water and enables conclusions to be drawn about the nutrient and pollutant content and ecological function of water resources. A site is classified as being in a region of water stress if at least one high water stress is present or if the quality of the available fresh water is assessed as very poor. Due to the data recording methods used, the determination of the water consumption KPI in regions of water stress considers the entire water consumption of reporting entities if at least one of their sites is in a region of water stress, with the result that the value disclosed in this annual report may be higher than the actual consumption in these regions.

The data are obtained from both internal and external information sources. The internal sources are site-related consumption data such as water withdrawals, discharges and recycling or storage volumes. External databases are also used to provide thresholds and comparative values for both water quantity and quality. The information is used to assess the conditions in the immediate vicinity of sites. In this way, it is possible to incorporate regional differences in the availability and quality of water resources into the assessment.

ESRS E5 Resource use and circular economy

This subsection discusses the impact of thyssenkrupp's operations on resource use and the circular economy, as well as the resulting risks and opportunities for the company. The goal is to disclose how thyssenkrupp records the use of materials and other resources, how the associated impacts on the availability of raw materials and on waste volumes are assessed and what strategies and actions are in place to improve resource efficiency and promote circular value creation models.

Strategy

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The table below explains the material impacts, risks and opportunities in connection with resource use and circular economy that were identified by the materiality assessment performed and are significant to thyssenkrupp's operations and business model.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

Topic	Category[1]	Description	VC[2]	TH[3]
Resource inflows	I (-)	As a rule, the extraction of raw materials – especially primary raw materials – results in physical interventions in natural and social systems, which may have negative impacts on the environment and society.	U	S
	I (+)	As a rule, resource efficiency in our products and production processes and circular design – for example, by improving durability, reusability and recyclability – result in a reduced need for primary raw materials and contributes to the transition to a circular economy.	U, Op, D	S, M
	O	Resource efficiency in product design and production may contribute to reducing the need for primary raw materials, facilitate cost savings and have a positive effect on thyssenkrupp's reputation.	Op	/
Waste	I (-)	Incorrect waste management – especially in the case of hazardous waste – may have negative impacts on the environment and human health.	U, Op	S

[1] I = impact; (-) = negative; (+) = positive; R = risk; O = opportunity
[2] VC = value chain; U = upstream; Op = own operations; D = downstream
[3] TH = time horizon; S = short-term; M = medium-term; L = long-term

Impact, risk and opportunity management

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

The policies explained in connection with this disclosure requirement address issues in connection with the use of natural resources and the promotion of a circular economic system. These include, in particular, the minimized consumption of primary raw materials by way of more efficient processes and product design, the increased use of secondary raw materials, waste management, and the sustainable purchasing and use of renewable materials.

The group environmental and energy management policy defines requirements concerning the consideration of resource-related environmental aspects in connection with our own business activities. These relate to, for example, the use of materials in production, waste and the circularity of products, as well as the environmental impacts associated with the aforementioned aspects.

thyssenkrupp's human rights and environmental due diligence obligations concern both its own operations and the upstream supply chain. The requirements they define for compliance with environmental standards therefore also apply to the company's suppliers and their subcontractors, for example, in respect of resource-efficient production methods, the handling of waste and the avoidance or remediation of environmental and health impacts caused by the extraction of raw materials and waste disposal.

Aspects in connection with the increased use of secondary materials and the growing shift toward renewable resources are not yet governed by a separate group policy. Some of these aspects are included implicitly in the environmental and energy policy, especially where there is a focus on material efficiency and the reduction of environmental impacts.

Environmental and energy management

The responsible use of natural resources is anchored as a strategic principle in thyssenkrupp's environmental and energy policy with the goal of cutting the use of natural raw materials, reducing the associated environmental impacts and thus preserving natural habitats.

Against this backdrop, the environmental and energy policy addresses the physical interventions in natural and social systems associated with the extraction of raw materials, especially primary raw materials. These interventions include the use of land, water withdrawals, pollution or increased waste, which not only impact the environment but may also have negative consequences for societies and future generations. They are countered by the potential to mitigate such impacts, for example, by way of resource efficiency or a product design that extends the service life and facilitates reusability or recyclability. Such approaches can reduce the need for primary materials and, as a result, the associated environmental and social impacts. In addition, resource efficiency may not only reduce environmental and social impacts but also provide economic opportunities associated with, for example, material savings and reputational effects in light of growing regulation and society's expectations in relation to circular value creation.

The group environmental and energy policy governs the implementation of environmental and energy management. It requires group companies to establish management processes for environmental aspects such as the utilization of materials, resource use and waste if these aspects are identified as relevant for the respective company. In this way, the goals of the environmental and energy policy are incorporated into the internal structures and processes of the relevant organizational units.

In connection with resource use and circular economy, this means that if the utilization of materials, waste or the circularity of products are relevant aspects for a group company, these must be included in environmental and energy management and managed systematically. Among other things, it concerns potential negative impacts that may be caused by using raw materials in production processes or by generating and disposing of hazardous waste.

Material environmental aspects are not restricted to negative impacts but may also include positive effects or business opportunities. This is the case especially when resource-efficient products and processes reduce the use of materials. Resource efficiency in products and processes can have a positive effect outside the company's own operations in the upstream or downstream value chain – for example, in the form of a longer product service life or improved reusability.

Further information on environmental and energy management can be found in subsection "E2-1."

Human rights and environmental due diligence obligations

In connection with human rights and environmental due diligence obligations, thyssenkrupp considers both potential and actual impacts associated with the extraction, use and disposal of raw materials, both in the company's own operations and in the upstream supply chain. The goal is to identify, prevent or effectively mitigate pollution caused by the extraction of raw materials and waste treatment and the resulting risks to society and the environment at an early stage.

One focus is on impacts that may be caused by the improper handling of hazardous waste or by inadequate disposal processes. Such practices harbor environmental risks – such as pollution of the air, soil or water – and may impair health as the result of, for example, contaminated water resources or residues in agricultural products. Comparable impacts may also occur in connection with the extraction of raw materials if this damages natural habitats, makes excessive use of water resources or breaches human rights standards.

In recognition of this responsibility, the principles on due diligence obligations formulate environmental expectations aimed at complying with statutory requirements and international environmental treaties. In thyssenkrupp's own operations, this includes complying with the relevant environmental legislation and taking a responsible approach to handling hazardous substances and waste – especially in respect of their potential impacts on the environment and health. With its Supplier Code of Conduct, thyssenkrupp has given substance to its expectations in this regard vis-à-vis its direct suppliers and relevant business partners. The aim is to prevent or mitigate risks such as pollution, land degradation or exposure to persistent pollutants in the supply chain. Further information on the due diligence obligations can be found in subsection "E2-1."

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

The following disclosures describe the actions taken by thyssenkrupp and the resources made available to implement the policies described in subsection "E5-1" concerning sustainable resource use, the promotion of approaches that favor the circular economy, the proper handling of waste and the prevention and mitigation of the resulting environmental impacts.

Environmental and energy management

The group environmental and energy management policy requires thyssenkrupp group companies that are classified as environmentally relevant to implement systems for the systematic management of environmental aspects. As part of these systems, operational actions are deployed to manage the main impacts, risks and opportunities in the areas of resource use, circular economy and waste management. Here, the focus is on an efficient use of raw materials and on the avoidance and legally compliant treatment of waste. Operational actions in this connection include the optimization of material cutting to reduce offcuts, the return of production residues to internal recycling loops, the separate recording and recovery of reusable fractions and the monitoring and documentation of hazardous waste in line with statutory requirements.

Other actions to improve raw material efficiency and apply the principles of the circular economy in products and processes are described in subsection "E5-5" concerning the disclosures relating to ESRS E5-5, para. 35.

In the context of environmental management systems, processes are established and responsibilities defined with the aim of ensuring the proper and legally compliant treatment of waste – in accordance with the statutory requirements for waste that apply at each site. These include appointing a waste officer or disposal coordinator, collecting waste in suitably labeled containers and the separate storage of hazardous waste in containers approved for that purpose. In addition, some sites use an electronic verification process for hazardous waste such as oil filters or used oil in order to comply with statutory verification requirements. Other measures include the documentation of transfers to certified disposal companies, employee training in the proper handling of waste and internal audits to review waste separation and storage.

The examples outlined above are operational environmental and energy management actions that are implemented decentrally and adapted to the situation at the respective site. At the policy level, the central actions are the classification of thyssenkrupp companies as environmentally relevant or energy-relevant and the obligatory introduction of corresponding management systems. No further policy steps are planned at present. Further information on environmental and energy management can be found in subsection "E2-1."

Human rights and environmental due diligence obligations

In implementing its human rights and environmental due diligence obligations, thyssenkrupp systematically identifies and assesses potential negative impacts on society and the environment, including those that may be caused by the consumption of resources or waste disposal in the company's own operations and in the upstream supply chain. The assessment is based on defined risk criteria and risk identification processes.

If risks are identified, priority should be given to initiating preventive action. In the event of actual incidents with relevant impacts, mitigation and clean-up actions must be implemented. Depending on the type of impact, further suitable remedial action must be initiated. The appropriate action is selected from a groupwide catalog on the basis of risk or incident. The effectiveness of the actions must also be documented and reviewed regularly. Further information on human rights and environmental due diligence obligations can be found in subsection "E2-2."

Metrics and targets

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

To date, thyssenkrupp has not defined any uniform groupwide targets related to resource use and circular economy within the meaning of ESRS E5. The reason for this is the heterogeneous nature of the businesses and sites associated with the different resource-related requirements and actions. Instead of setting general targets, thyssenkrupp has taken a decentralized management approach on the basis of site-specific environmental and energy management systems and the implementation of human rights and environmental due diligence obligations.

The effectiveness of environmental and energy management is monitored by, for example, audit findings, external certifications (e.g., in accordance with ISO 14001 and ISO 50001) and the annual groupwide environmental data collection process.

The effectiveness of the implementation of human rights and environmental due diligence obligations is monitored using established risk and control processes, including the assessment of the risks and incidents identified at the sites and in supply chains and the monitoring of the remedial actions initiated.

E5-4 – Resource inflows

thyssenkrupp has identified material resource inflows for its own operations. This analysis covers products, materials and property, plant and equipment. It also considers critical raw materials and rare earths that may be potentially relevant for the company's own operations and along the value chains.

Product and materials inflows were analyzed using a weight-based evaluation of purchasing data. The focus is on metallic raw materials such as ores and coke, as well as coal, base metals, processed metal products and mineral products. These materials and products are central to metallurgical processes, manufacturing processes, industrial plant engineering and the operation of technical equipment. Other products used in these areas include engineering plastics, chemical auxiliaries, electrical components and coatings, which are also considered to be relevant resource inflows.

The analysis found that neither biological materials nor packaging are material resource inflows for thyssenkrupp. Compared with the technical materials and products used, both categories make up a negligible proportion by weight and were therefore not considered in any subsequent assessment.

The material property, plant and equipment are determined by assessing the relevant balance sheets. In this connection, technical installations, plant buildings, installations under construction and production-related equipment that serve as the physical basis of industrial value creation were identified as significant.

Potentially relevant critical raw materials and rare earths are identified on the basis of the definitions contained in Regulation (EU) 2024/1252 and the ERECON list. Their potential relevance to thyssenkrupp and the upstream and downstream value chain was determined by assessing specialist sources and based on the opinions of internal experts. The potentially relevant substances include metals for alloys and high-performance materials (e.g., aluminum, chrome, nickel and titanium), raw materials for energy storage systems and batteries (e.g., lithium, cobalt and graphite), chemical precursors (e.g., phosphorus, boron and fluorite) and rare earths (e.g., neodymium, dysprosium and yttrium) for use in magnets, sensors and electronics. This classification is subject to further analysis and verification.

At present, no full company-specific primary data are available for the proportion of components, intermediates and materials that are reused or recycled as secondary materials. To date, this information has not been recorded systematically and consistently as part of the procurement processes. Nevertheless, to enable a rough allocation of the proportion of circular materials to the total resource inflows, an estimated factor aligned with a circularity metric is applied. This is based on the global material flow balance which records and displays annual raw material inflows (renewable, non-renewable and secondary raw materials) as mass flows. It is assumed that the input mass becomes an output (emissions, waste, losses or recycled materials) at the end of the life cycle and only the proportion reused is deemed to be circular. By contrast, the primary inflows are viewed linearly, irrespective of whether they are renewable or not. Product service life, intensity of use and inventories are not considered because the balance represents an annual snapshot. The indicative factor is applied to the total resource inflows recorded and reflects the proportion of reused and recycled materials in relation to total resource inflows.

RESOURCE INFLOWS

tons	2024 / 2025
Technical materials used	21,630,765
Products used	6,060,584
Total weight	**27,691,349**
thereof secondary materials and products in t	1,910,703
thereof secondary materials and products in %	7%

E5-5 – Resource outflows

In the context of this disclosure requirement, thyssenkrupp publicizes information on its resource outflows, including waste. The goal of this disclosure is to provide transparency about how the company contributes to resource efficiency by designing its products and materials in accordance with the principles of the circular economy and strategies for waste prevention and management. Information is provided on the circularity and durability of products and materials and on the volumes and treatment channels of the waste generated, supplemented by the composition of the company's relevant waste streams.

Products and materials

At thyssenkrupp, the principles of the circular economy may be applied in both product design and production processes, with the goal of contributing to resource efficiency through design decisions – such as measures to extend the service life of products and improve their reusability and reparability, the technical optimization of materials and the return of materials to technical and biological cycles. In this connection, uniform definitions were used to identify the material products and processes designed in accordance with the principles of the circular economy. These defi-

nitions are aligned with relevant European legislation and established reference frameworks and are used in the assessment of the following examples. The specific calculation was performed by experts from the relevant segments and business units on the basis of qualified estimates.

Durability and service life extension

In the Steel Europe segment, the surface finish of ZM EcoProtect® was to receive improved corrosion protection as a contribution to extending the service life of outer paneling, especially in the automotive industry. In addition, high-strength and wear-resistant steel is used to ensure the longer service life of end products. This also applies to high-strength, non-oriented electrical steel, which may increase the efficiency and service life of electric motors by reducing losses and improving mechanical strength.

At Rothe Erde in the Decarbon Technologies segment, surface hardening is aimed at increasing wear resistance and extending the service life of slewing bearings. The induction hardening processes used are specifically aimed at strengthening critical functional surfaces such as raceways and gears; depending on the application, this is achieved by varying the hardness of the raceways and gear teeth. Shot blasting can be used additionally as a mechanical process to strengthen the surface, which serves to improve fatigue strength. Full-surface hardening ensures the even distribution of the hardness and is particularly suitable for high-load applications such as rotor bearings for wind energy installations. It is intended to increase resistance to friction and material fatigue.

The Automotive Technology segment also uses processes such as shot blasting and induction hardening to improve the fatigue resistance of crankshafts and springs. In addition, near-net-shape forging and the use of combined materials in joined crankshafts – manufactured from individual components that are linked together – should enable a material-efficient design that reduces resource consumption.

Reparability, disassembly, reuse and remanufacturing

In designing products and plants, thyssenkrupp applies concepts such as modularity, ease of disassembly and reparability to extend the service life, supplemented by remanufacturing services.

Uhde, Polysius and thyssenkrupp nucera in the Decarbon Technologies segment may specifically implement these principles in product and plant design by means of modular plant concepts, standardized components and the long-term availability of replacement parts. This system architecture aims to enable the targeted replacement or upgrade of modules without interrupting operation, as well as their easy disassembly and reuse. The electrolysis business of thyssenkrupp nucera also deploys approaches to remanufacture individual modules so that they can be used again in industrial applications. At Rothe Erde, maintenance services can be delivered to extend the service life of slewing bearings; rolling elements, seals and cages can be replaced, and raceways and gears can be reworked so that they can be returned to technical use.

In the Marine Systems segment as well, modular design concepts can increase the reparability of marine platforms such as frigates and submarines throughout their life cycle by planning the use of replaceable functional units to facilitate flexible repair. For example, entire mission modules and technical subsystems can be replaced without the need to take the entire platform out of service. In addition, targeted maintenance strategies and retrofitting concepts – to modernize sensors, drive technology and safety systems, for example – can contribute to extending service life.

Return to technical and biological cycles

To foster the use of closed material cycles, thyssenkrupp deploys approaches to return material flows to technical and biological systems.

In the technical area, Steel Europe has reduced its dependence on primary raw materials by using high-quality steel scrap in its bluemint® recycled product. Moreover, MillServices & Systems – part of the Materials Services segment – processes desulfurization slag from steel production for secondary uses such as fertilizers or construction materials. In addition, Uhde's FTR® process is aimed at producing PET plastic with a recycled content and helping to close plastic cycles. An additional example is the Carbon2Chem® collaborative project, which uses steel mill gases in a pilot plant at the Steel Europe site in Duisburg to produce base chemicals such as methanol or ammonia; the aim is to reuse these substances as raw materials in industrial processes rather then emitting them.

In the area of biological substance recycling, Uhde has developed the PLAneo® process to manufacture polylactic acid (PLA) from bio-based lactic acid. The resulting polymer can be composted in industrial facilities and returned to the biological cycle at the end of its life cycle. The production process also integrates the fermentation and purification of lactic acid with PLA production, generating ammonium sulfate as a by-product that can be used as a fertilizer. In a joint project for advanced biofuels technology, Uhde is taking a thermochemical approach that uses gasification to convert materials like biowaste into biofuels such as synthetic diesel or sustainable aviation fuel (SAF) and into bio-based naphtha for use in chemical production processes; the aim is to replace fossil fuels and close material cycles.

Expected durability of the products compared with the industry average

Estimates by internal experts were used to determine the expected durability of selected product groups compared with the industry average. As no standardized industry averages could be identified for the expected durability of the analyzed product groups, the information given is based on the company's internal benchmarks that result from product-specific durability indicators, validated test specifications and empirical values from the product life cycle.

Below is a structured presentation by business area.

Automotive Technology

The durability of safety-relevant vehicle steering systems was assessed on the basis of load changes that simulate typical conditions of use such as parking maneuvers, road vibration and various driving profiles. The goal is to preserve full function throughout the tested service life.

- **Mechanically adjustable steering column:** 1 million load changes
- **Column EPS (brushless):** 0.5 million load changes
- **Rack EPS (REPS):** 0.5 million load changes

It should also be noted that service life testing in the Automotive Technology segment is generally based on individual customer requirements. The test specifications and assessment criteria may vary in scope, load profile and targets, depending on the customer. The benchmarks listed therefore serve as orientation and can be used in standardized development processes for the respective product groups. Moreover, no industry averages for expected durability could be identified for this product segment.

Decarbon Technologies

For selected product groups of thyssenkrupp nucera, Polysius, Uhde and Rothe Erde in the Decarbon Technologies segment, the expected durability was assessed on the basis of product-specific technical indicators.

- **Alkaline electrolyzers (nucera):** 7,300 start-stop cycles
- **Cement plants (Polysius):** design service life of 45 years for the entire plant
- **Ammonia/methanol plants (Uhde):** design service life of 20 years for the main equipment

The durability of slewing bearings (Rothe Erde) was assessed on the basis of the raceway fatigue life in accordance with ISO/TS 16281:2008, in combination with the bearing service life models in accordance with DIN/ISO 281. This involved determining the loads that occur in the system under consideration and the load collective resulting from the typical operating states. The nominal service life of the raceways was calculated on the basis of the speed, load changes and planned operating time of the system. The aforementioned standards do not define a specific service life but provide the basis for comparison with the expected design service life of the entire system. In the case of wind energy applications, the design service life is usually 20 years – as defined in IEC 61400-1. However, the actual value to be considered depends on the specific OEM requirements.

Marine Systems

The design service life of military surface vessels and submarines was used as the indicator for assessing the expected durability. This indicator describes the technically planned service life in the case of correct maintenance and overhaul by the operator and can be used because it has been defined on the basis of engineering standards and specifies the dimensions of key structural and equipment components.

- **Submarines:** design service life of 40 years
- **Frigates:** design service life of 30 years

The actual service life depends on and can be extended by various factors such as regular maintenance, modernization and the operational concepts used. No industry averages for expected durability could be identified for these products.

Other businesses

This kind of durability assessment was not used by the Materials Services and Steel Europe segments. Materials Services is primarily concerned with trading and thyssenkrupp can exercise only limited influence on the durability of the products. For this reason, no systematic assessment of durability is performed. The main product of Steel Europe is a prefabricated or intermediate industrial product with a material function that is processed into a wide range of different downstream products. The actual durability is largely dependent on the respective end use – automotive, construction or packaging – so it is not possible to define a uniform product service life.

Proportion of recycled materials in products

thyssenkrupp uses a model-based process to estimate the proportion of recycled materials in the products it placed on the market in the reporting period. Due to the lack of primary data for the actual reuse of the materials contained in the products at the end of their life cycle, the calculation is based on the material volumes used in the production process.

The relevance of the material volumes used is classified on the basis of weight. For methodological reasons, packaging materials and proportions by weight below defined relevance thresholds are not included. Recyclability rates are used for the remaining material groups; they are derived from the technical literature and industry studies and from publicly accessible recycling statistics. These show the proportion of a material that is considered to be recyclable in principle using current technologies.

On this basis, a recyclable material content of around 95% was calculated. This value particularly reflects the strong focus of thyssenkrupp's product portfolio on metallic materials and products, which have high potential for reuse.

The calculation represents a methodological estimation. The main uncertainties result from the assumption that resource inflows are representative of actual product composition and from the generalization of material groups through the use of general recyclability factors.

Waste

In the context of this disclosure requirement, information on the waste volumes generated by the company's own operations are reported. The goal is to create an understanding of the waste, its treatment and the composition of the waste streams. This disclosure differentiates waste as hazardous and non-hazardous waste and by the recovery and disposal processes used. In addition, information is disclosed on non-recycled waste and the composition of the relevant waste streams.

WASTE GENERATION AND TREATMENT

tons	2024 / 2025
Recovered waste	**1,348,750**
thereof non-hazardous waste	**1,086,347**
recovered by preparation for reuse	23,174
recovered by recycling	963,451
recovered by other recovery operations	98,974
thereof hazardous waste	**262,404**
recovered by preparation for reuse	1,564
recovered by recycling	214,906
recovered by other recovery operations	45,927
Disposed waste	**278,721**
thereof non-hazardous waste	**223,815**
disposed by incineration	604
disposed by landfilling	197,791
disposed by other disposal operations	25,052
thereof hazardous waste	**54,906**
disposed by incineration	8,199
disposed by landfilling	33,845
disposed by other disposal operations	12,841
Radioactive waste	**0**
Total amount of waste	**1,627,472**
thereof hazardous waste	317,310
thereof non-recycled waste	449,115
thereof non-recycled waste in %	28%

Waste data are calculated using standardized definitions aligned with the requirements of the EU Waste Framework Directive (2008/98/EC) and supplementary legislative instruments. Three waste categories are recorded: non-hazardous waste, hazardous waste and radioactive waste. Non-hazardous and hazardous waste are further differentiated by the recovery and disposal processes used. With the exception of the preparation for reuse, this process is classified using relevant R and D codes as defined in Annexes I and II of the Waste Framework Directive. Radioactive waste is recorded only as a total volume and is not differentiated by recovery or disposal process. It is allocated to non-recycled waste.

In the reporting year, data were recorded by direct measurement, calculations based on operating parameters, modeling, estimated and invoice-based analysis. All waste data relate to activities and sites that are under the financial or operational control of thyssenkrupp.

Waste composition

The composition of the waste streams generated at thyssenkrupp vary depending on the economic activity. Steel production mainly generates metallurgical waste such as slag, metal-containing dust, slurries and oily residues from process water treatment. The production of components and plants mainly generated metallic processing waste such as shavings and abrasives and consumables such as lubricants and oil. In addition, packaging waste and – in isolated cases – construction and commissioning waste such as cables, paints and insulating materials may occur. The system and major assembly work in, for example, energy and process plant engineering or in maritime systems technology results in waste caused by maintenance, repair and retrofitting. Such waste includes metal residues, electronic components and various auxiliaries. The trading business, including material processing, contributes to waste mainly in the form of packaging materials such as wood and plastics, warehousing residues and production-related waste such as offcuts or shavings.

Materials in waste:

The relevant material groups in the aforementioned waste streams include:

- **Metals:** iron, steel, aluminum, copper and other non-ferrous metals
- **Non-metallic minerals:** slags, ceramic residues, refractory materials
- **Plastics:** packaging materials, insulation, engineering plastics
- **Oily substances and chemicals:** waste oil, cooling lubricants, emulsions, solvents
- **Wood:** especially from packaging and means of transport
- **Electronic components:** e.g., sensors and circuit boards

Internal experts from the businesses were consulted to identify the significant waste types and the materials contained therein. The assessment is based on an allocation of the waste streams to the relevant chapters of the European Waste Catalogue in line with Commission Decision 2014/955/EU. These estimates were determined on an indicative basis, aligned with operational experience and available information on waste streams from the areas of activity.

3. Social information

ESRS S1 Own workforce

As a company with international operations, thyssenkrupp is conscious of its social responsibility for its own workforce. We are committed unreservedly to the respect for human rights and fair working conditions, promote occupational safety and health, and advocate for equal opportunities.

Strategy

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Our own workforce is made up of our own employees, i.e., people in a direct employment relationship with a thyssenkrupp company, and of non-employees. In our presentation of policies, actions and targets, we always indicate whether these also apply to non-employees.

The general procedure for performing the materiality assessment and the interaction of material impacts, risks and opportunities with the strategy and business model is described in the section headed "ESRS 2." In order for this analysis to consider the perspective of the "own workforce" stakeholder group as fully as possible, various areas of the Corporate Function Human Resources were involved. The following table shows the material impacts, risks and opportunities for thyssenkrupp in respect of its own workforce, which we identified in the double materiality assessment. They are additionally explained in this subsection.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO OWN WORKFORCE

Topic	Category[1]	Description	VC[2]	TH[3]
Working conditions	I (-)	The extensive transformation currently taking place at thyssenkrupp may result in an increased feeling of uncertainty about job security in the affected businesses.	Op	M
	I (+)	Training and development and talent development for our employees may result in improved qualification and employability.	Op	M
	R	The global shortage of skilled workers and demographic change in many countries are contributing to the reduced availability of workers on the external labor market. Longer recruitment processes and vacancies represent a risk for thyssenkrupp.	Op	/
Labor rights and other work-related rights	R	In some countries in which thyssenkrupp operates, local conditions mean that there is a potential risk of human rights violations. Such a violation represents a legal, reputational and financial risk for thyssenkrupp.	Op	/
	I (-)	Freedom of association and collective bargaining governed by external regulations in deviation from our guidelines may restrict social dialog and thus have negative impacts on the affected employees.	Op	S, M
	I (-)	Deviations from occupational safety measures and safety requirements as well as the risks inherent to a production environment may result in injuries or long-term harm to the health of our own employees or non-employees; in the worse case, they may even result in fatalities.	Op	S, M, L
	I (+)	Preventive action to promote occupational health strengthens our employees' well-being and their physical and mental health.	Op	S, M
	I (-)	Discrimination is a violation of fundamental human rights and, like a lack of equal opportunities, may reduce the options available to the affected employees and their well-being.	Op	S, M
	I (+)	thyssenkrupp's offering to promote equal opportunities creates a working environment that takes account of the individual characteristics and needs of all employees. This results in a workplace culture that strengthens employee motivation.	Op	S, M

[1] I = impact; (-) = negative; (+) = positive; R = risk; O = opportunity
[2] VC = value chain; U = upstream; Op = own operations; D = downstream
[3] TH = time horizon; S = short-term; M = medium-term; L = long-term

With regard to all policies and actions discussed in this section, thyssenkrupp considers all local laws applicable to thyssenkrupp companies.

Material negative impacts

The materiality assessment identified four potential and one actual negative impact. Our systematic and continuous risk management has the goal of minimizing negative impacts on the workforce as far as possible by means of corresponding actions.

In terms of working conditions, a potential negative impact concerns job security. In the past fiscal year, we continued to press ahead with our portfolio and structural optimization measures. These are resulting in restructuring measures in some businesses, where employees may be affected by workforce adjustment measures.

In connection with labor rights, there is a potential negative impact in a very small number of countries in respect of freedom of association and collective agreements because these countries either restrict these rights in part or such rights do not exist at all. In these countries, employees' options for social dialog may be limited.

An actual negative impact was identified in the area of occupational safety. For production employees in particular, long-term physical activity may result in impaired health or work-related ill health. Any deviation from our occupational safety and health requirements may result in accidents. However, the investigation of accidents at thyssenkrupp show that these have no systemic causes; instead, they are usually isolated cases.

Another potential negative impact for employees arises from violating the ban on discrimination and a lack of equal opportunities. This may result in stress and the reduced well-being of those concerned. Depending on workplace dynamics, some employees may be at greater risk of experiencing unequal treatment or discrimination in the workplace. To prevent this negative impact, all the alleged cases reported are investigated systematically.

Material positive impacts

The positive impacts mainly arise for the group's own employees who are in a direct employment relationship with a thyssenkrupp company. We use the opportunities available to us to create an attractive working environment.

The materiality assessment identified an actual positive impact in the area of training and development. For many years, thyssenkrupp has accepted its responsibility to provide apprenticeships. In fiscal year 2024 / 2025, we offered training in more than 60 apprenticeships in Germany. The apprenticeship training rate in Germany was 5.1%, which exceeds the company's own needs. The continuous professional training of our employees is also important to us. In addition to the continuing professional training provided by the businesses, the thyssenkrupp Academy offers our employees a broad portfolio of internal continuing professional training options. Employees benefit from improving their qualifications by strengthening their employability.

thyssenkrupp endeavors to create an environment in which employees with different characteristics and needs can develop freely and unlock their full potential. We foster equal opportunities using a variety of formats and measures – from gender-neutral language in job advertisements in recruiting, through flexible working (time) models, to supporting the creation of employee networks. As early as 2015, thyssenkrupp issued a joint statement with the company's employee representatives which expressly committed to identifying and fostering the potential of employees with disabilities and to creating the necessary workplace environment, taking account of local legislation. These measures impact employees positively in many ways. They foster a workplace culture based on mutual respect and strengthen employees' satisfaction, motivation and sense of belonging.

Our range of preventive health measures also has a positive impact on our employees' well-being. These measures not only focus on promoting physical health but also on strengthening mental health.

Risks and opportunities arising from dependencies in connection with own workforce

In some of the countries in which thyssenkrupp operates, there is a potential heightened risk that human rights – especially the ban on trafficking in human beings, child and forced labor – cannot be respected in full, for example, due to inadequate government control mechanisms or deviating legal provisions. The possible violation of human rights is a particular risk for people employed in these countries. However, our regular risk assessment has not revealed any specific risks for thyssenkrupp companies and their workforce.

In the context of the growing global shortage of skilled labor, inadequate employee training and development harbors the risk that not enough qualified specialists are available to effectively execute orders in due time and to ensure continuous improvement and innovation. However, targeted training and the continuous fostering of employees' professional development offer the opportunity of increasing productivity thanks to improved specialist skills, engendering the loyalty of thyssenkrupp's existing employees and to making thyssenkrupp an attractive employer for potential candidates.

Impact, risk and opportunity management

S1-1 – Policies related to own workforce

Policies for handling material impacts, risks and opportunities

Our approach to managing the material impacts, risks and opportunities relating to our own employees is anchored in a number of policies. The overarching target is unambiguous: people are the focus at thyssenkrupp. Overarching policies may be expanded or supplemented by local regulations that are applied only for certain countries, entities or sites.

Policies relating to working conditions and respect for human rights

We are committed to respecting internationally recognized human rights and the principles of fair working conditions. In this connection, we unequivocally reject trafficking in human beings, forced labor, child labor and all forms of discrimination, and promote equal opportunities. The framework for our conduct is shaped by applicable local legislation, the thyssenkrupp Code of Conduct, our policy on human rights and environmental due diligence obligations and the International Framework Agreement (IFA). Overarching information on the policy for human rights and environmental due diligence obligations can be found in the section headed "ESRS E2 Pollution."

CODE OF CONDUCT

Category	Description
Content of the policy	The Code of Conduct is the expression of our shared values and binding ground rules. It describes how we behave in compliance with the law, with integrity and ethically correctly and is evidence of the standards we set for ourselves, our business partners and other stakeholders.
Scope	All companies, employees, managers and members of the Executive Board and management teams
Level of responsibility	The Executive Board of thyssenkrupp AG is responsible for the Code of Conduct. Compliance with the rules and standards is monitored in the context of control processes to identify and report possible misconduct. The company's managers are the primary contacts. The Compliance Investigation department at thyssenkrupp AG and the International Committee are available as the central points of contact for reporting.
External reference framework	thyssenkrupp is committed to complying with internationally recognized standards, including: UN Global Compact International Bill of Human Rights of the United Nations Core Labor Standards of the International Labour Organization (ILO) International agreements concerning civil, political, economic, social and cultural rights
Stakeholder information	The Code of Conduct is made available to our employees and all stakeholders via the company intranet and other internal channels. External stakeholders have access via thyssenkrupp's corporate website. In addition, a complaints procedure has been established to enable affected persons or organizations to directly report potential violations or concerns. This ensures that the Code of Conduct is not only communicated transparently but are also implemented in practice within the company.
Applied in the report	S1, G1

Policies for occupational safety and health

We accord high priority to occupational safety and health. Our mindset and our rules for dealing with the material impacts are consolidated in the "Occupational safety and health" policy.

OCCUPATIONAL SAFETY AND HEALTH

Category	Description
Content of the policy	The policy defines how we act to ensure that all thyssenkrupp employees can perform their work in safety. It describes how risks are identified in order to prevent accidents and work-related ill health.
Scope	To ensure the safety and health of our employees, thyssenkrupp has established an occupational safety management system with corresponding recommendations for action that is applied in all thyssenkrupp companies. Non-employees in day-to-day operations are also integrated into thyssenkrupp's occupational safety management system, unless this conflicts with legal provisions or other requirements. Partner companies that work for thyssenkrupp should be informed about the occupational safety and health management requirements at the time the contract is awarded and must state their acceptance thereof. If work is to be performed at a thyssenkrupp site, the company must discuss relevant mutual risks with the partner company so that suitable protective measures can be agreed.
Level of responsibility	All of thyssenkrupp's executive boards, managing directors, managers and supervisory bodies are responsible for the implementation of and compliance with occupational safety and health policies. The Chief Human Resources Officer of thyssenkrupp AG has ultimate responsibility for compliance. Monitoring takes place annually in the form of a self-declaration by the thyssenkrupp companies in the context of the internal control system. The responses are reviewed by the Occupational Safety and Health department, which may request further information. The risk report informs the Executive Board and Supervisory Board of thyssenkrupp AG of the findings of the analysis.
External reference framework	ISO 45001
Stakeholder information	Before starting work, all thyssenkrupp employees must undergo safety training that draws their attention to the relevant occupational safety measures applicable to their roles. Regular training and on-site information events are another key feature of occupational safety and health. The relevant documents are accessible on the intranet to all thyssenkrupp employees; excerpts from the policy are published on our corporate website.
Applied in the report	S1

Policies for dealing with discrimination and fostering equal opportunities

The ban on discrimination is anchored in the thyssenkrupp Code of Conduct and in the principles for human rights and environmental due diligence obligations. We consider ensuring equal opportunities for persons with disabilities to be a corporate duty and, back in 2015, we committed to this in a joint statement with the Group Works Council and the group representatives for severely disabled persons. Our goal is to create a working environment in which all employees can contribute on the basis of their abilities and needs.

thyssenkrupp requires all employees, managers, managing directors and executive board members to ensure a working environment that is free from discrimination on the basis of gender, skin color, religion, nationality, political or other convictions, ethnic origin, disability, age, sexual orientation and other factors and has explicitly anchored this in the Code of Conduct and principles. The reporting and remediation process described in subsection "S1-3" applies to incidents of discrimination.

JOINT STATEMENT ON INCLUSION

Category	Description
Content of the policy	The goal is to foster a cultural shift. The inclusion of employees with disabilities should be a matter of course in all operational and corporate decisions from the outset. The statement defines a number of areas of action that must be addressed to achieve this cultural shift. They include, for example, support for the needs of persons with disabilities in application processes, workplace design and the creation of an accessible environment, the promotion of equal opportunities in training and development and offerings for preventive healthcare and workplace reintegration.
Scope	The statement primarily relates to employees in Germany. Managers outside Germany are asked to implement the goals contained in the statement, taking account of the respective local legislation and conditions.
Level of responsibility	The implementation of specific measures is the responsibility of local HR and other managers and should be monitored locally. The local employer representatives and the representatives for severely disabled employees should jointly define the responsibilities. The Chief Human Resources Officer of thyssenkrupp AG has ultimate responsibility for compliance with the policy.
External reference framework	United Nations Convention on the Rights of Persons with Disabilities Statutory requirements such as Germany's Social Security Code IX (SGB IX)
Stakeholder information	The statement is accessible on the thyssenkrupp intranet and is also made available via the relevant codetermination bodies.
Applied in the report	S1

Explanations regarding the material impacts, risks and opportunities without policies

For corporate strategy reasons, thyssenkrupp has not established any central policies relating to the material impacts, risks and opportunities in connection with secure employment and training and development. The rationale for this is explained in more detail below.

In the context of job security, if restructuring measures are needed, we work with the segments' HR teams to create solutions that enable them to implement any necessary workforce adjustment measures in the most socially responsible way possible, taking account of the local situation. In many countries, the use and design of fixed-term employment contracts or employment contracts without guaranteed working hours is regulated by law. We are also bound by collective agreements in many countries.

In our mission statement, we commit to our employees' continuous professional development as one of the key pillars of our conduct. However, given the heterogeneity of our products and business models, the requirements in terms of employee training and development differ. For this reason, it is the responsibility of the local entities to identify training needs and provide suitable training courses. The employees of thyssenkrupp entities which have a service agreement with the thyssenkrupp Academy can also access an overarching range of training courses.

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

thyssenkrupp values the views of its employees. They are engaged directly in the form of surveys like the annual thyssenkrupp Employee Pulse Check and indirectly via the codetermination bodies and trade unions. In addition, regular dialog formats such as "klar:text" give employees the opportunity to directly question the Executive Board or other decision-makers and to present their own views. The Corporate Function Human Resources also speaks regularly with the employee representatives.

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. The annual survey is conducted by the Corporate Function Human Resources and sponsored by the Chief Human Resources Officer.

At thyssenkrupp, engagement with the employee representatives takes place at different levels. In the context of codetermination and in accordance with statutory provisions, the interests of employees worldwide are advocated in the Supervisory Board of thyssenkrupp AG by the ten employee representatives (including one representative of the group executives and three trade union representatives). The employee representatives therefore make up half of the Supervisory Board.

At group level, thyssenkrupp additionally maintains an active social partnership with the Group Works Council, the European Works Council, the Group Executives' Committee and the trade unions represented at thyssenkrupp. The Corporate Function Human Resources, under the leadership of the Chief Human Resources Officer, ensures the engagement of the employee representatives. It meets regularly with the Group Works Council and its relevant expert committees, jointly preparing group works agreements on issues that are subject to codetermination. The European Works Council is the body for social dialog and the representation of employee interests at the European level. The existence and composition of the European Works Council are governed by the Agreement on European Dialog and Information to and from Employees in the European Group Companies. On the basis of this agreement, we inform and consult the European Works Council in advance of relevant, cross-country / multilateral operational changes that will affect more than one country.

thyssenkrupp has concluded an IFA with the Group Works Council and the representatives of Germany's IG Metall trade union and IndustriALL Global Union on respect for human rights and the ILO Core Labor Standards based thereon. Compliance with this agreement is monitored by our International Committee as the relevant codetermination body. At least once a year, the Chief Human Resources Officer of thyssenkrupp AG reports to the International Committee on the current implementation status and compliance with this agreement. Members of the International Committee, the Chief Human Resources Officer and the Corporate Function Human Resources regularly visit selected sites and countries to ensure compliance with the IFA and human rights due diligence obligations.

In Germany, the interests of young employees up to the age of 18 and all persons in training are represented by the youth and trainee representatives. In accordance with § 178 of Germany's Social Security Code IX (SGB IX), the representatives for severely disabled employees promote the integration of severely disabled persons into the company office or site, represent their interests and provide them with advice and assistance. Outside Germany, the representation of and engagement with employees with disabilities take place in accordance with statutory requirements and local regulations, for example, via the human resources departments. In addition, thyssenkrupp supports the creation of employee networks to enable employees to discuss their experiences and raise their concerns to the relevant bodies.

S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns

Various channels are open to our workforce for reporting possible violations or grievances. In the first instance, managers, codetermination bodies and trade union representatives at the company are the direct points of contact for reporting and resolving incidents at the local level. Incidents can also be reported by email or anonymously via a central system to the responsible points of contact within the company. The email addresses and ways to access the online tool are published on the corporate website (www.thyssenkrupp.com). All channels are available to both thyssenkrupp employees and non-employees, and to representatives on the codetermination bodies. Remediation processes involving the relevant corporate functions and stakeholders have been defined to review and process potential violations. The whistleblower systems are operated by external providers while the mailboxes for submitting reports are managed internally.

The workforce is regularly informed about the established processes and reporting channels, for example, via newsletters or posters. thyssenkrupp protects the identity of whistleblowers by providing a secure system. All information is treated in confidence and reports may be submitted anonymously. If a whistleblower provides their contact details, they will receive feedback on their report. Actual and potential negative impacts that are reported should be ended as quickly as possible, their causes investigated and, depending on the findings, corresponding remedial action initiated. The remedial process also includes an assessment of effectiveness.

As provided by the IFA, we have established the International Committee as a codetermination body to monitor implementation of the agreement by thyssenkrupp. Another task of this committee is to work with the employer representatives to address potential or actual human rights violations and develop solutions.

thyssenkrupp's Corporate Function Human Resources is responsible for managing the remedial process for incidents relating to human and employee rights or discrimination. Depending on the circumstances, other departments and committees may be involved in the process.

The effectiveness of the channels and their recognition is measured by regularly monitoring access figures during meetings of the International Committee. Assessment of the speak-up culture as part of the annual Employee Pulse Check is a further indicator of the degree to which employees trust the established reporting structures.

S1-4 – Taking action on material impacts, risks and opportunities related to own workforce and the effectiveness of those actions

We implement many actions to prevent negative impacts or risks to our workforce and strengthen potential positive impacts or opportunities. If an action is not compatible with local legislation, the applicable legislation shall have precedence.

Respect for human rights

At thyssenkrupp, respect for human rights is non-negotiable. To ensure that all employees worldwide are aware of this, mandatory training on human rights and environmental due diligence obligations is conducted worldwide.

In order to comply with the provisions of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), we perform an annual risk assessment for our companies worldwide so that preventive action can be initiated if necessary. Moreover, we systematically examine all potential violations reported via the various channels, end any violation if the initial suspicion is confirmed and investigate the causes in the context of a remedial process to mitigate the risk of similar violations in the future. We take preventive and remedial actions on the basis of risk and as necessary. The preventive action includes regular training for our employees and communication of the channels for whistleblowers. The evaluation of the incidents reported via the established whistleblower systems enables us to assess whether the implemented measures are effective in preventing human rights violations.

The measures are intended to address the material impacts on human rights, in particular forced and child labor, freedom of association and discrimination. They apply worldwide and are implemented continuously without a defined end date, although the exact details may vary locally and are subject to local laws applying to the respective thyssenkrupp companies.

Job security and labor rights

In connection with refocusing the portfolio, various M&A, restructuring and reorganization measures were examined, prepared and in some cases already realized. These measures were accompanied by activities required by labor and codetermination law, e.g., corresponding agreements with the employees. In fiscal year 2024 / 2025, necessary job reductions affected around 3,100 employees. Where necessary, our businesses are implementing additional restructuring measures to enable an optimal response to changing markets. This has not only been done in the steel business but also for individual businesses in other segments. The goal is to make the group and its businesses more profitable and resilient in the long term. For this reason, we work with the segments' HR teams to develop new solutions that make it possible to implement necessary workforce adjustment measures in the most socially responsible way possible.

thyssenkrupp considers itself to be a fair employer that is conscious of its social responsibility to its employees. A key component in this regard is the internal job market. The possibility of recruiting employees internally is one of the central pillars of our groupwide HR policy.

These measures are connected with the impacts on secure employment. They apply worldwide, although the exact details may vary locally and are subject to local laws. The measures are implemented continuously and have no defined end date.

Occupational safety and health

Occupational safety and health are important topics at thyssenkrupp and are consolidated in the Occupational Safety and Health (OSH) department. Our goal is to continuously improve our occupational safety and health management, thus avoiding accidents, work-related illnesses and stress.

When they start work, our own employees and non-employees must participate in a safety briefing adapted to their role. If relevant, they are also provided with the appropriate protective equipment to enable them to safely perform their work duties. In the context of prevention, regular workplace inspections, hazard assessments, accident investigations and occupational health advice for employees help to minimize occupational safety and health risks.

Some employees have free access to the services of the Employee Assistance Program (EAP), which provides access to professional counseling and support from external cooperation partners on dealing with stressful professional or personal challenges.

This year again, our "we care" days focused on occupational safety and health topics. A central worldwide activity was the app-based "we care Challenge" involving teams from 37 countries. We received 20 nominations for the "we care Award," three of which received a prize. In the past fiscal year, we also continued the "leaders care" initiative focused on supporting managers in fulfilling their responsibility for occupational safety and health.

The measures aim to address the material impacts, risks and opportunities relating to occupational safety and health. Their effectiveness can be measured on the basis of trends in the accident frequency rate. Evidence of the effectiveness of health promotion measures can be seen in, for example, employees' interest in the company's healthcare offerings. All measures apply worldwide and have no defined end date.

Equal opportunities in the workplace

Openness, equal opportunities and mutual appreciation are among the core values of our corporate culture. In the past fiscal year, we again organized a wide variety of events to raise awareness for equal treatment both internally and externally and to strengthen collaboration, psychological safety and a sense of belonging for all employees.

thyssenkrupp has made a public commitment to values such as openness and tolerance and opposes discrimination. This has been demonstrated through our campaign against hatred ahead of Germany's parliamentary elections and through our renewed participation in the Christopher Street Day event in Cologne. We also use occasions such as the International Day of Persons with Disabilities or International Women's Day for specific celebrations and to support our internal employee networks. With our employer branding campaigns we are raising the visibility of employees with different backgrounds in our workforce. We are also seeking to strengthen equal opportunities in our company's apprenticeship programs.

We aim to ensure that all candidates are given equal consideration in the selection process, particularly when filling management positions. There are also targeted offers for high potentials to promote their development and further improve their career opportunities.

We seek to enable our employees to achieve a better work-life balance through the use of flextime and part-time working models, job sharing, hybrid working and temporary working from abroad. At some sites, employees also benefit from childcare offerings.

The measures are implemented continuously and have no defined end date. The exact design of measures to flexibilize working hours and improve work-life balance is decided locally, taking account of the prevailing conditions and requirements. Various metrics – including the trend in the part-time working ratio, the proportion of employees with disabilities and the proportion of women in leadership positions – enable us to assess the effectiveness of the measures.

Training/continuing professional development and employee development

At thyssenkrupp, training remains a high priority. Our commitment in this area is an investment in the future, not only in light of the shortage of skilled labor. For this reason, we are implementing extensive measures to attract people to do an apprenticeship at thyssenkrupp, especially in Germany. We meet potential apprentices on their terms – on social media, at information events in schools and universities, on training platforms or using other employer branding instruments such as digital parents' evenings in collaboration with the Federal Employment Agency. Apprenticeships at thyssenkrupp are regularly rated as very good in internal surveys and on external portals. In Germany, mentoring initiatives like "Paten für Arbeit e.V." and innovative training concepts help ease the way into an apprenticeship. Regular exchange with companies outside the thyssenkrupp group, for example, through the "Allianz der Chancen," an initiative for new ways of working in which currently 71 companies address topics such as strengthening the relevance of apprenticeships, help to counter the shortage of skilled workers.

In addition to the businesses' training and development activities, the thyssenkrupp Academy provides internal training offerings and transformation support. The offerings include customized curricula for managers and employees, digital learning services and individual solutions for teams and organizations. The high quality of the offerings and compliance with international standards are reflected in its ISO 29993 certification.

In the past fiscal year, thyssenkrupp identified more than 1,800 talents worldwide (i.e., employees with the potential for more senior specialist and leadership roles). Targeted development is supported by regular development dialogs, feedback and the use of diagnostic methods to determine their status quo. Cross-segment networking formats such as the Talent Summit, various forums and workshops are intended to contribute to the development and retention of this important target group.

The measures are implemented continuously and have no defined end date. Apprenticeships are offered in Germany especially, whereas continuing professional development and talent development are provided worldwide.

Metrics and targets

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

In light of the material impacts, risks and opportunities for its own employees, thyssenkrupp currently has the following targets:

TARGETS IN RELATION TO OUR OWN EMPLOYEES

Group	Target value	Target date	Status Sept. 30, 2025
Accident Frequency Rate (AFR)	1.9	2027 / 2028	2.7
Fatal accidents	0	2024 / 2025	1
Women in leadership positions	17.0%	2025 / 2026	17.5%

The targets in the area of occupational safety and health were defined by the OSH Committee, which comprises the Chief Human Resources Officer of thyssenkrupp AG, the human resources officers for the segments, the head of Occupational Safety and Health at thyssenkrupp AG, and representatives of the Group Works Council and the European Works Council. This committee and the OSH Council monitor target attainment and the implementation and effectiveness of any actions derived on this basis.

The accident frequency rate measured as occupational accidents of own employees that result in at least one day of lost time per million hours worked was 2.7 in fiscal year 2024 / 2025, which was below the target set by the company.

In the past fiscal year, we were unable to meet our target of zero fatal accidents at work. The stated aim remains to reduce the number of fatal accidents to zero. In the past fiscal year, one fatal accident involving a company employee in railway operations occurred at a third-company site. 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.

The target for women in leadership positions is defined by the Executive Board of thyssenkrupp AG. The target is used in accordance with local laws. With the proportion of women in leadership positions amounting to 17.5% at the end of the reporting year, thyssenkrupp exceeded the target it had set itself.

In the case of other material issues relating to the workforce, no targets were defined at group level due to the heterogeneous requirements of the thyssenkrupp businesses and the different requirements in the individual countries.

S1-6 – Characteristics of the undertaking's employees

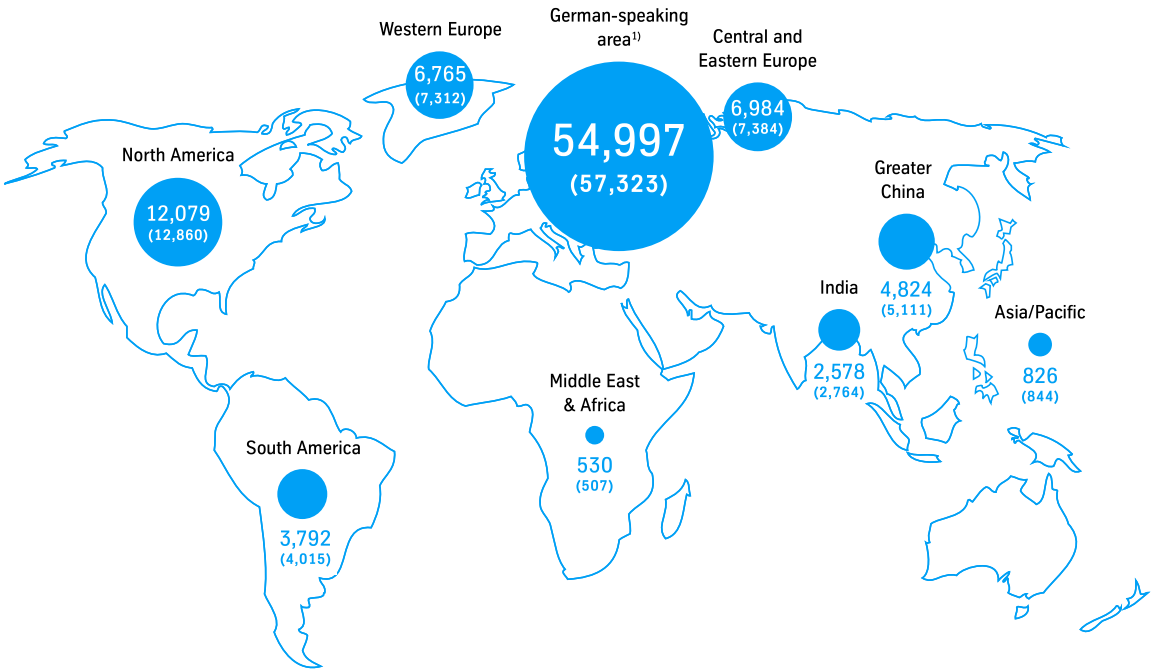
The number of own employees covers all employees including executive board and management team members, apprentices, trainees and other employees in apprenticeship-type relationships (headcount) as of September 30, 2025. It does not include employees with dormant employment relationships. The thyssenkrupp companies record their data in the central HR reporting system. Information on gender is aligned with local regulations and laws: In many countries, it is not possible to disclose any gender other than male or female. The reported number of employees can be placed in relation to the annual average number of employees as disclosed in the notes to the financial statements. It includes the prorated figure of 1,515 employees for the HKM joint operation. Unless otherwise stated, all the other metrics in the section headed "ESRS S1 Own workforce" do not include the HKM employees.

EMPLOYEES BY GENDER

Gender	Headcount
Male	77,122
Female	16,248
Other	2
Non disclosed	3
Total number of employees	**93,375**

EMPLOYEES BY REGION

(prior-year figures in brackets)



[1)] Germany, Austria, Switzerland, Liechtenstein combined; in Germany 52,148 (54,235)

EMPLOYEES BY COUNTRIES WITH AT LEAST 10% OF THE EMPLOYEES

Country	Headcount
Total number of employees	93,375
Germany	52,148
Other countries	41,227

EMPLOYEES BY TYPE OF CONTRACT AND GENDER[1)]

Headcount	Female	Male	Other	Non disclosed	Total
Permanent employees	14,826	71,232	2	3	86,063
Temporary employees	1,420	5,884	0	0	7,304
Non-guaranteed hours employees	2	6	0	0	8
Total number of employees	**16,248**	**77,122**	**2**	**3**	**93,375**

[1)] According to the CSRD the assignment of employees to the contract types is based on local legislation

EMPLOYEES BY SEGMENT

	Sept. 30, 2024	Sept. 30, 2025	Change in %
Automotive Technology	31,633	28,892	(9)
Decarbon Technologies	12,678	12,335	(3)
Materials Services	16,003	15,433	(4)
Steel Europe	27,478	25,993	(5)
Marine Systems	8,041	8,585	7
Corporate Headquarters	639	613	(4)
Reconciliation	1,648	1,524	(8)

In the reporting year, 11,424 employees left the company. This represented a fluctuation rate of 12.6%. In accordance with the CSRD, the figure includes the number of employees who leave the company voluntarily or due to dismissal, retirement or death in service. The voluntary fluctuation rate was 5.1%, with 4,572 employees leaving the company.

S1-8 – Collective bargaining coverage and social dialogue

At thyssenkrupp, the working conditions of 77.1% of employees in the European Economic Area (EEA) are specified in collective agreements. 92.1% of employees in the EEA are represented by an employee representative body at the company level. In addition, interests at the European level are represented by the European Works Council. Details of employee representation at thyssenkrupp can be found in subsection “S1-2.”

INFORMATION ON COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

	Collective Bargaining Coverage	Social Dialogue
	Employees – EEA	Workplace representation (EEA only)
Coverage Rate	(for countries with >50 empl. representing >10% total empl.)	(for countries with >50 empl. representing >10% total empl.)
0–19%		
20–39%		
40–59%		
60–79%		
80–100%	Germany	Germany

S1-9 – Diversity metrics

EMPLOYEES BY AGE GROUP[1)]

Age	Headcount	In %
Up to 30 years	16,610	18.1%
31 to 50 years	47,194	51.4%
Over 50 years	28,056	30.5%

[1)] To maintain consistency to the established reporting, the clusters deviate from the CSRD by 1 year.

Women in leadership positions

The calculation of gender distribution at the top management level takes account of managers in graded positions; they include the Executive Board and the three management levels below it.

GENDER DISTRIBUTION IN TOP MANAGEMENT

	Headcount	In %
Male	1,067	82.5%
Female	226	17.5%
Other	0	0.0%
Non disclosed	0	0.0%
Total	**1,293**	**100.0%**

S1-10 – Adequate wages

thyssenkrupp rewards the work of its own employees with adequate compensation that complies at least with the statutory minimum wage or other industry standards.

S1-14 – Health and safety metrics

thyssenkrupp accords high priority to the health and safety of its employees. An important aspect of this is our occupational safety management system in accordance with ISO 45001. The proportion of the workforce covered by an occupational safety management system is 100%. Details of the applicable policies for occupational safety and health are described in subsection “S1-1.”

HEALTH AND SAFETY

Metrics	Number
Recordable work-related accidents (employees)	421
Fatalities due to work-related accidents (employees)	1
Fatalities due to work-related accidents (non-employees)	0
Fatalities due to work-related accidents (miscellaneous people on thyssenkrupp sites)	1
Fatalities due to occupational diseases (employees[1])	0

[1] Cases of which thyssenkrupp gained knowledge in the current fiscal year in accordance with local legislation and data protection

S1-16 – Remuneration metrics (pay gap and total remuneration)

The disclosure of the unadjusted gender pay gap required by the CSRD compares the average hourly wages of men and women. It does not consider attributes that affect salaries such as training, sector of activity, professional experience, management responsibility – despite progress in recent years, women at thyssenkrupp are less likely then men to hold management positions – and structural differences in the workforce.

The unadjusted gender pay gap at thyssenkrupp was 11.6% in fiscal year 2024 / 2025. Related to basic salary, excluding variable compensation components such as allowances for night and weekend work or bonuses, the unadjusted gender pay gap was 4.3%. The factor between the highest income at thyssenkrupp and the median income of all employees was 46. If part-time income is extrapolated to a full-time equivalent and only full annual incomes are considered, the factor was 40.

The hourly wage was calculated on the basis of the gross salary paid, including variable compensation components, divided by the target working hours. Paid overtime and overtime allowances are not included as overtime is not part of the target working hours. In accordance with the CSRD, the hourly wage for men was defined as 100% and then set in a ratio to the hourly wage for women. Employees with a dormant contract and those without a salary or target working hours are not included for the months in which one or more of the criteria mentioned applied. All salaries were converted to euros.

S1-17 – Incidents, complaints and severe human rights impacts

The table below provides an overview of the complaints and incidents relating to the company's own workforce, which were received via the available channels.

INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

	2024 / 2025
Reported cases of discrimination, including harassment (number)	27
Number of complaints filed through channels for own workers to raise concerns	12
Number of complaints filed to National Contact Points for OECD Multinational Enterprises	0
Amount of material fines, penalties, and compensation for damages as a result of discrimination incidents and complaints (EUR)	0.00

No serious human rights violations were recorded in fiscal year 2024 / 2025.

ESRS S2 Workers in the value chain

thyssenkrupp is committed to responsible conduct in its own operations and along the value chain. We advocate for the rights of workers in the supply chain and seek to minimize potential negative impacts through our risk management. If we become aware of any human rights or environmental violations, we deploy specific actions to end these violations and bring about positive changes.

Strategy

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

As an international industrial and technology group, thyssenkrupp has a global supplier network spanning many countries and industries. Due to the complexity and global reach of our value chains, potential indirect impacts on employees in the upstream and downstream value chains in respect of human and labor rights cannot be entirely ruled out. In our double materiality assessment, we considered particularly actual and potential impacts relating to human and labor rights such as child labor, forced labor and trafficking in human beings, unfair working conditions, a lack of freedom of association, inadequate wages, poor working time regulation, a lack of occupational safety and discrimination.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO VALUE CHAIN WORKERS

Topic	Category[1]	Description	VC[2]	TH[3]
Working conditions	I (-)	A lack of secure employment – such as zero-hours contracts – may result in uncertainty among workers in the value chain and societal costs due to unplanned unemployment.	U	M
	R	The increased uncertainty among workers in the value chain caused by a lack of secure employment – such as zero-hours contracts – represents a legal, productivity and reputational risk for thyssenkrupp.	Op	/
	I (-)	The violation or lack of labor rights in respect of working time and wages causes negative impacts for the workers in the value chain.	U	S, M
	I (-)	The denial of freedom of association and collective bargaining, a lack of social dialog and the absence of works councils result in negative impacts for workers in the value chain.	U	S
	I (-)	A lack of work-life balance may result in psychological health issues for workers in the value chain.	U	S
	I (-)	Inadequate accident prevention and occupational safety actions result in negative impacts for the health of workers in the value chain.	U	S
Equal treatment and opportunities for all	I (-)	Discrimination and any associated violence are breaches of fundamental human rights and result in negative impacts for the workers in the value chain. For thyssenkrupp, discrimination in the value chain was identified as a potential negative impact.	U	S, M
	I (+)	Our skills development actions may increase the level of education and qualification of workers in the value chain.	U	M
Other work-related rights	I (-)	Child and forced labor are breaches of fundamental human rights and have negative impacts on the quality of life, education and financial future of those affected. For thyssenkrupp, child and forced labor were identified as potential negative impacts.	U	S, M
	R	Cases of child and forced labor in the value chain represent a legal and reputational risk for thyssenkrupp.	Op	/
	I (-)	Violations of other work-related rights, such as a lack of access to a complaints procedure, may result in negative impacts for workers in the value chain.	U	M

[1] I = impact; (-) = negative; (+) = positive; R = risk; O = opportunity
[2] VC = value chain; U = upstream; Op = own operations; D = downstream
[3] TH = time horizon; S = short-term; M = medium-term; L = long-term

Workers in the upstream supply chain – both in the extraction of raw materials and in the manufacture of products – are particularly affected by negative impacts. Poor occupational safety may be hazardous to health or even life-threatening. Inadequate wages and all forms of discrimination may impair physical and psychological health or reduce the quality of life of those affected. Especially in countries with inadequate protection of human rights, restrictions on the freedom of association and expression may be clear indications of oppression. The groups that may be particularly affected by impacts in connection with child and forced labor include young workers and low-qualified workers who have few educational opportunities and are therefore exploited very frequently. In the downstream value chain, the people who work in the transport and logistics sector face human and labor rights violations. Due to complex and hard-to-control structures involving many subcontractors and changing contractual relationships, transparency in this sector is limited. This makes it difficult to monitor working conditions and may jeopardize compliance with fundamental standards such as those relating to working time, fair wages and occupational safety.

Our double materiality assessment identified actual and potential negative and positive impacts only on workers in the upstream value chain.

Material negative impacts

The actual negative impacts resulted from violations that were reported via the various channels of our complaints procedure and were confirmed. They concern topics such as inadequate wages and working time, poor occupational safety and accident prevention and the denial of freedom of association. Inadequate wages may result in, for example, poverty, hunger and a lack of educational opportunities for children. The abuse of working time regulations such as a lack of breaks or excessive overtime may result in physical and psychological stress and exhaustion that is harmful to health. A lack of occupational safety may be harmful to health or even life-threatening and may also affect the psychological health of the affected person. The denial of freedom of association and collective bargaining may mean that workers have only limited options to defend themselves against unfair treatment. The actual negative impacts that were identified were isolated cases at individual suppliers.

We identified potential negative impacts in respect of child and forced labor and for all forms of discrimination and the associated violence. In relation to working time models, poor work-life balance is a potential negative impact, as are other work-related rights such as the lack of access to a complaints procedure. The lack of secure employment may cause uncertainty for those affected and result in societal costs due to unplanned unemployment. Child and forced labor are variously widespread and/or systemic in some countries and industries, as is discrimination on the basis of ethnic origin or religion. Safety risks are also systemic in iron ore mines in certain countries. The increased probability of potential impacts in this respect result from our operations in China, India and Brazil. The other potential negative impacts identified are not considered to be systemic; they are the result of isolated cases at suppliers and are not connected with specific business relationships of thyssenkrupp. thyssenkrupp recognizes that certain groups of workers in the supply chain may be at particular risk in respect of human and labor rights. This applies to, for example, minorities that experience a greater probability of forced labor in certain regions due to their ethnic origin or religion. Workers involved in the extraction of certain raw materials may be exposed to greater occupational safety risks. Moreover, migrant workers, indigenous peoples, women and trade union members are to some extent at greater risk of discrimination.

Material positive impacts

Skills development to increase education and qualification represents a potential positive impact on all workers in the supply chain. It may contribute to increasing the educational level and qualifications and, as a result, improve the long-term employment opportunities and standard of living in the affected regions.

Risks related to value chain workers

We have also identified risks for thyssenkrupp in connection with workers in the supply chain. These are risks of a legal nature and reputational risks due to child or forced labor. Moreover, the lack of secure employment for workers in the supply chain may reduce productivity and result in legal action and reputational damage for the company. No opportunities for thyssenkrupp were identified in connection with workers in the supply chain.

Impact, risk and opportunity management

S2-1 – Policies related to value chain workers

thyssenkrupp is committed to complying with recognized international sustainability standards, which concern social responsibility alongside good corporate governance and environmental due diligence. To minimize negative impacts on workers in the supply chain, we have established a groupwide policy for the compliance with and implementation of human rights and environmental due diligence obligations. Overarching information on the policy for human rights and environmental due diligence obligations can be found in the section headed “ESRS E2 Pollution.”

The policy is aimed at implementing the statutory requirements of the LkSG and of internationally recognized frameworks such as the UNGPs, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. Violations of the aforementioned conventions that were identified in the reporting year are described in subsection “S2-4.”

The human and environmental rights anchored in the policy cover the material issues for thyssenkrupp that were identified in the materiality assessment: child labor, forced labor and trafficking in human beings, occupational safety and health, freedom of association, adequate wages and working time, discrimination and unequal treatment, the protection of free speech and privacy, land theft, the use of contractors and environmental obligations.

The policy identifies groupwide risk management processes that are used to identify, assess and reduce human rights and environmental risks within thyssenkrupp’s supply chains. We determine the risk for each supplier on the basis of a systematic risk analysis that takes account of the severity and reversibility of the risks and our degree of influence. The suppliers are assigned to an SCA (Supply Chain Act) risk category defined by thyssenkrupp. Further information can be found in subsection “S2-4.” The risks identified serve as the basis for preventive action that we take to minimize the potential negative human rights or environmental impacts on workers in the supply chain. The policy requires that group companies that identify a human rights or environmental violation initiate appropriate action to remedy problems and concerns and minimize their impacts. Violations can be identified through various sources and reported via various channels, including our publicly accessible whistleblower system. This accessible system is available to all persons, those affected or other third parties worldwide. Further information can be found in subsection “S2-3.”

The thyssenkrupp Supplier Code of Conduct (SCoC) is an integral element of our policy on compliance with and implementation of human rights and environmental due diligence obligations and formulates the requirements derived therefrom that we make of our suppliers. The SCoC specifies respect for human rights and compliance with fundamental labor standards; it 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 SCoC. Our suppliers are required to comply with applicable environmental regulations, reduce emissions, use resources responsibly and minimize the risks associated with handling hazardous substances. A further focus is integrity in commercial transactions. thyssenkrupp requires its suppliers to comply with all applicable laws, especially those relating to corruption prevention, antitrust and fair competition, data protection, anti-money

laundering, trade compliance and the handling of conflicts of interest. We view transparent, comprehensible and ethically responsible business practices to be a condition for long-term cooperation.

We have developed the policy without an overarching and systematic approach to direct participation by stakeholder groups. However, the content was prepared in collaboration with various internal departments such as the Sustainability department in Purchasing and the Legal department. We also consulted other stakeholders such as the European Works Council, the Group Works Council, the IG Metall trade union and the world confederation of industrial trade unions. The policy design and the actions derived from it also took account of the interests of workers in the supply chain canvassed via interviews during audits or indirectly via thyssenkrupp's involvement in initiatives such as econsense or the German Institute for Human Rights. We also draw on the complaints we receive as a way of including the perspectives of those affected in our SCA risk management system. The SCA risk management system was reviewed by an external law firm and assessed as appropriate.

At present, securing the jobs of workers in the value chain is not part of a policy. Although our double materiality assessment identified this issue as a potential negative impact, we currently have no specific indications of any actual violations or other problem cases.

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

thyssenkrupp is committed to its responsibility as a fair employer. This means that we take our social responsibility seriously and also expect our suppliers and business partners to comply with certain principles and standards. Clearly defined minimum standards are necessary to safeguard these values. For this reason, thyssenkrupp has signed the IFA on respect for human rights and compliance with minimum labor standards. In addition to recognizing the ILO Core Labor Standards and the Universal Declaration of Human Rights, the IFA covers principles for occupational safety and health, options for professional and personal development, the right to adequate compensation, a ban on child and forced labor and a ban on all forms of discrimination.

Our approach to our responsibility is not only a feature of our own corporate culture. As a fixed element of our relationships with suppliers, we also expect them to take a corresponding approach to respecting human rights and environmental concerns. Our expectations are contained in our SCoC (see previous subsection "S2-1"). Its implementation is reviewed by external auditors in the context of random supplier audits. When selecting the suppliers for audit, group companies should give particular priority to those suppliers with elevated risk potential. A central aspect of the audit is interviews with the supplier's workers. In this way, we gain direct insights into their perspectives as well as potential and actual negative impacts. The group companies must then use targeted actions to implement and monitor any potential for improvement identified in this way. The actions form an active part of our SCA risk management.

Employees in our value chain can use the publicly accessible complaints procedure in accordance with the LkSG as a reporting and communication channel (see also subsection "S2-3"). In this way, they can submit information on actual or potential human rights or environmental violations anywhere in our value chain. In the course of investigating a complaint, we review the case and contact the person affected to enable us to properly and transparently clarify the situation by way of direct dialog. The Chief Compliance Officer reviews the effectiveness of the complaints procedure once yearly and reports the findings to the Executive Board of thyssenkrupp AG. If appropriate, workers should be questioned during supplier audits to establish whether they are familiar with the complaints procedure and have understood its various steps.

In addition to the direct relationships with our suppliers, thyssenkrupp is engaged in initiatives to improve global standards and promote human rights principles. Examples of this are our participation in the econsense company network and in working groups of the German Institute for Human Rights. Our participation in these initiatives enables us to indirectly capture the interests and perspectives of workers in the supply chain and integrate them systematically in our policies and actions.

Beyond this, thyssenkrupp currently has no uniform, cross-business and systematic process aimed at capturing the perspectives of workers across the value chain. Our approach is aligned with the current requirements of the LkSG, which focuses on direct suppliers and considers the upstream supply chain on an ad hoc basis.

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

thyssenkrupp is working on an ongoing basis to analyze the human rights and environmental impacts of its business activities, identify potential and actual negative impacts for workers in the value chain at an early stage and implement suitable actions. To this end, the groupwide policy for compliance with human rights and environmental due diligence obligations was developed. This policy is embedded in an integrated and interdisciplinary SCA risk management system, which encompasses the following elements on the basis of the LkSG: risk analyses, processes to implement preventive and remedial actions, the definition of responsibilities, the publication of principles, a complaints procedure, and documentation and reporting. Further information can be found in subsection "S2-1."

We implement many different actions to minimize human rights and environmental risks, especially relating to trafficking in human beings, child and forced labor, working conditions, occupational safety and health, discrimination, freedom of association and environmental concerns. The measures include acceptance of the thyssenkrupp SCoC by our suppliers, specific training for suppliers and a contractual commitment to complying with human rights and environmental standards. Compliance with our requirements is reviewed by, for example, random supplier audits (see preceding subsection "S2-2") or self-declarations. If these reveal potential for improvement, the group companies systematically monitor its implementation. Further information can be found in the following subsection "S2-4." In the case of particularly serious violations, we reserve the right to suspend or terminate the business relationship as a last resort. The relevant corporate functions, responsible persons and bodies of the respective group companies and the SCA Officer Group are systematically involved in implementing these measures and are informed of their progress. In addition, their effectiveness is reviewed on a regular basis.

Various reporting channels are available to enable us to fulfill our responsibility in relation to complying with human rights and identifying violations at an early stage. We have established low-threshold access for all stakeholders, including our employees, suppliers, suppliers' workers, affected persons and other third parties. Our whistleblower system can be used to report violations and alleged cases. It can be accessed publicly via the thyssenkrupp website and is available in 34 languages. Reports can be submitted in an accessible manner from anywhere in the world and, if desired, anonymously. The latter is intended to enable potentially affected persons to use the system without fear of negative consequences or reprisals. thyssenkrupp guarantees that all reports received will be treated in confidence. Confidentiality and the protection of whistleblowers are central features of the complaints procedure. Other reporting channels include a telephone hotline. Contact is also possible via email or mail.

Suppliers are informed of the available options and reporting channels via training courses. They are explicitly requested to communicate the information provided to their workers and subsuppliers, without any threat of consequences should the reporting channels be used. Many group companies additionally implement their own measures to publicize the complaints procedure, for example, by sending an information leaflet with payslips.

The Compliance Investigations department holds central responsibility for managing the whistleblower system. Reports relating to global minimum labor standards – such as compliance with the ILO Core Labor Standards, protection from discrimination, the ban on child and forced labor, and appropriate occupational safety and health standards – can also be submitted via the International Committee's whistleblower system, which is based on the IFA. The International Committee comprises representatives of thyssenkrupp, the European Works Council, the Group Works Council, the IG Metall trade union and IndustriALL Global Union. This system is primarily intended for thyssenkrupp's own employees (see the section headed "ESRS S1 Own workforce"); if reports are received relating to external matters, it is ensured internally that these reports are forwarded to the persons responsible for processing.

thyssenkrupp categorically rejects all reprisals against persons who have acted in good faith to report actual or avoidable problems and concerns or support investigations. All available reporting channels and the associated measures to guarantee confidentiality and anonymity and to protect the rights of whistleblowers are regulated fully by thyssenkrupp's whistleblowing rules of procedure. These stipulate that every report must be treated fairly, objectively and in accordance with statutory requirements. Whistleblowers must be able to have confidence that the information they provide will be taken seriously and that they will be protected from any disadvantage.

S2-4 – Taking action on material impacts, risks and opportunities related to value chain workers and the effectiveness of those actions

As part of our risk management system to comply with our human rights and environmental due diligence obligations, thyssenkrupp has implemented structured actions with the goal of mitigating material negative impacts on workers in the supply chain and risks to the company.

The risks we identified in the course of our system-based and systematic risk analyses in accordance with the LkSG serve as the basis for actions to mitigate potential negative impacts on workers in the supply chain. We perform a twice-yearly risk analysis for our direct suppliers – including transport and logistics providers – and ad hoc analyses for our indirect suppliers. These risk analyses enable us to identify potential negative impacts relating to human rights, occupational safety and health and environmental protection (SCA risk areas) on the basis of groupwide sustainability criteria. The individual risks underlying the SCA risk areas include the material topics identified for thyssenkrupp in the double materiality assessment. They can be found in the table of SCA risk areas and SCA individual risks.

SCA RISK AREAS AND SCA INDIVIDUAL RISKS

SCA risk areas	SCA individual risks
Human rights	Child labor; forced labor; discrimination in the workplace; denial of freedom of association; inadequate wages and working hours; land theft; outsourced labor; contamination; discrimination and associated violence; protection of freedom of expression; personal rights and privacy
Occupational health and safety	Obviously inadequate safety standards; lack of appropriate protective measures and of protective equipment; lack of measures to prevent fatigue; inadequate training of workers
Environmental protection	Use, storage and disposal of chemicals and waste; generation of emissions and consumption of energy and water

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. 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. On the basis of its own logic, thyssenkrupp distinguishes between five SCA risk categories (very low, low, moderate, high and very high). The suppliers' SCA risk category therefore serves as the basis for taking suitable preventive action to reduce the risks.

In selecting the preventive action, the group companies are guided by a standardized catalog of actions developed by thyssenkrupp. The actions include, for example, ISO-compliant system certification or actions relating to specific raw materials such as the Aluminium Stewardship Initiative (ASI) certificate. The ASI certification standard is designed to minimize the risks in the aluminum value chain and is intended to address the human rights specified in internationally recognized standards such as the ILO Core Labor Standards, the OECD Guidelines for Multinational Enterprises and the UNGPs, for example, child and forced labor, discrimination and occupational safety. Suppliers associated with conflict materials within the meaning of the EU Conflict Minerals Regulation (tin, tantalum, tungsten and gold) must go through a specific due diligence process at the level of the thyssenkrupp group company. The goal of this process is to ensure that the supply chains of these raw materials are not used to finance armed conflicts or illegal armed groups. A verification process has also been defined in respect of mercury and the associated potential negative health impacts due to inadequate occupational safety and pollution. Each year, the responsible SCA Officer Business for the respective thyssenkrupp segment provides the respective group company with a list of the suppliers operating in states that have not ratified the Minamata Convention on Mercury. The group company must then investigate whether these suppliers procure products containing mercury or use mercury in their production processes. If this reveals a risk for a supplier, the group company must perform a detailed analysis on the basis of a mercury-specific questionnaire to assess any necessary safeguards.

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 SCoC (see also subsection "S2-1") and implement the defined standards accordingly.

We expect the same of our existing suppliers. Among other things, all forms of child labor are banned in accordance with the ILO Core Labor Standards to protect minors from exploitation, health risks and the consequences of poor education. Also banned are forced labor, including trafficking in human beings and modern slavery. The goal is to prevent a loss of self-determination and damage to physical and psychological health. thyssenkrupp is also unequivocally opposed to all forms of discrimination and unequal treatment, whether this is on the basis of gender, religion, nationality, political or other convictions, ethnic origin, disability, age or sexual orientation and identity. No person may be disadvantaged, favored or harassed on the basis of these or other characteristics. To optimally prevent accidents and work-related ill health, we require our suppliers to implement an appropriate occupational safety system that includes the identification, assessment and reduction of actual and potential accident and health risks, as well as the recording and investigation of incidents. Suitable training measures and instruction for workers in the supply chain, the provision of suitable protective equipment and appropriate contingency plan measures should also be elements

of the supplier's appropriate occupational safety management system. Moreover, the SCoC requires compliance with the respective national legislation relating to working time and wages. If there is no such national legislation, the international ILO standards shall apply. Respect for the rights of workers to establish a workers' representative body, strike and conduct collective bargaining negotiations are also regulated by the SCoC. Other work-related rights relate to the freedom of expression and the protection of privacy, the use of contractors and environmental management requirements in respect of the response to harmful soil changes, water contamination, air pollution or excessive water consumption. Compliance with the SCoC is aimed at preventing all risks identified as material for thyssenkrupp and the potential and actual impacts for workers in the supply chain. In the case of suppliers for which our risk analysis has identified a high or very high risk, the group companies must additionally obtain a contractual commitment to comply with the SCoC. Through this contractual commitment, the supplier confirms that it will comply with the SCoC requirements and address them appropriately, both in its own operations and its supply chain. To ensure compliance with the requirements defined in the SCoC, we expect our direct suppliers to implement suitable management systems and business processes. We also expect their active collaboration in preventing violations and in the process to prevent violations in connection with one of the aforementioned topics.

To verify whether suppliers are complying with our requirements and acquire deeper insights into their practices, we rely on instruments such as self-declarations and audits conducted by third-party providers. In the reporting period, supplier audits focused on sites in China, India and Brazil. In these countries, there are particular challenges relating to fair working conditions, occupational safety, freedom of association and the ban on child and forced labor, so we are concentrating more on preventive action and controls. We include the interests of workers in the supply chain in our due diligence obligations in the form of interviews. If these audits identify violations or elevated risks, the supplier is required to take targeted corrective action and the thyssenkrupp group company must monitor its implementation. If necessary, a follow-up audit of the supplier must be carried out.

With our training formats, we aim to increase the awareness of our direct suppliers for human rights and environmental due diligence obligations and support them in implementing the resulting requirements. One key aspect of the content is to communicate the policy on human rights and environmental due diligence obligations in the upstream supply chain and purchasing processes. For this reason, our e-learning course for suppliers focuses on the requirements of the Supplier Code of Conduct and addresses all potential negative impacts identified by the double materiality assessment as material for thyssenkrupp. It also explores the legal basis and background to the necessity for human rights and environmental due diligence obligations, explains the relationships with global supply chains and the possible impacts on workers in the upstream supply chain of violations such as undignified working conditions, a lack of occupational safety or inadequate wages. The suppliers are also informed of their duties to cooperate when they sign the contractual commitment to comply with the SCoC.

Our complaints procedure is a further important approach for preventing and reducing negative impacts. It was established to enable early action to prevent violations of laws and internal group regulations and possible breaches of human and environmental rights and legal interests and to prevent harm to thyssenkrupp employees, business partners and their workers, affected third parties and thyssenkrupp itself. Further information on the complaints procedure can be found in subsection "S2-3."

If a group company establishes that a violation of a human rights or environmental due diligence obligation has already occurred or is imminent, it must take appropriate remedial action without delay to prevent or end this violation or to mitigate the scale of the violation. The type of remedial action is to be decided on a case-by-case basis; direct dialog with those affected in the course of the investigation may be part of the action. If a violation of an obligation that has occurred cannot be remedied within a maximum period of six months, the group company must work with the supplier to develop a concept for ending or minimizing the violation. This should also consider actions that have already been initiated by the supplier itself, other customers or the authorities. However, an existing third-party concept does not release the thyssenkrupp group company from its obligation to agree its own action with the supplier. As a matter of principle, thyssenkrupp pursues the goal of supporting suppliers in complying with human rights and environmental due diligence obligations and of enabling them rather than immediately terminating the business relationship.

In the reporting period, we identified serious human rights violations relating to inadequate wages and working time and a lack of occupational safety at direct suppliers. The classification of severity depends on whether a violation is an individual case or systematic and whether it is reversible or not. Further actual negative impacts on workers in the supply chain that were not classified as serious also related to the topics of inadequate wages and working time and a lack of occupational safety, as well as violations of the freedom of association. All incidents were identified and monitored by supplier audits. Specific remedial action and improvement measures are defined to end all the violations identified; they must be implemented by the affected suppliers and monitored by the relevant thyssenkrupp group companies.

We continue to develop our SCA risk management system, including the risk analyses and the actions derived therefrom, and regularly review their effectiveness. The goal of this review of effectiveness is to identify any potential for improvement and include this in the further development of the risk management system. The review is the responsibility of our Chief Compliance Officer, who reports on the findings of the review at least once yearly to the Executive Board. We use a central tool for the operational implementation of the risk management process. The same tool is used to perform data-based risk analyses of our suppliers. The findings are immediately available to the responsible departments of the business units. In each case, the responsible group company must ensure that the preventive action by the supplier and available findings are documented in an audit-compliant manner.

The actions described in this report are implemented in the course of regular business operations and do not result in any significant capital expenditure (CapEx) or operating expenditure (OpEx). The actions are implemented continuously.

Regarding job security for workers in the supply chain, thyssenkrupp is currently taking no structural actions because there is no concrete indication of material violations. However, we already have long-term contracts with various suppliers of electricity, gas and raw materials such as iron ore, for example. These agreements ensure a high degree of planning certainty for both parties, especially in respect of human resource and production requirements.

Metrics and targets

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

In fiscal year 2023 / 2024, thyssenkrupp set itself a measurable target to foster sustainability in purchasing and systematically mitigate the risks of negative impacts on workers in the upstream supply chain. We aim to achieve the final target value stepwise before the end of fiscal year 2026 / 2027.

Based on the requirements of the LkSG, we regularly perform risk analyses as described in subsection "S2-4" to identify potentially high-risk suppliers in our supplier portfolio. If suppliers continue to be seen as an elevated risk (high or very high) despite the implementation of risk-mitigating measures, they are classified as high-risk suppliers. To manage the associated sustainability risks and reduce the negative impacts in the supply chain, we introduced the High Risk Supplier Reduction (HSR) as a metric. This describes the annual reduction in the share of suppliers that continue to be classified as high risk – even after risk-mitigating measures – in the total number of potentially high-risk suppliers. We have committed to taking targeted risk-mitigation measures to achieve a continuous improvement in sustainability performance across the supply chain. By fiscal year 2026 / 2027, the HSR is to be reduced gradually to a value of 36.4%. Based on the value for fiscal year 2023 / 2024, this represents an improvement of just under 50 percentage points.

By systematically identifying and reducing the number of high-risk suppliers, we want to contribute to strengthening human rights and environmental standards in the supply chain. The HSR serves as a key management element for identifying and mitigating potential negative impacts on workers in the upstream supply chain.

The HSR is calculated on the basis of the risks for our direct suppliers identified in the risk analysis and the measures taken to minimize negative impacts on people and the environment in the supply chain. Further information can be found in subsection "S2-4." We use external risk indices to analyze country and industry risks and, in subsequent steps, link these with our business-specific purchasing data. In this calculation, we take account of the probability of occurrence, the anticipated severity and the irreversibility of a potential negative impact. We have also defined red flags – such as child and forced labor – that are assessed as a very high risk, irrespective of any other weightings used in the calculation. A risk analysis is performed for all active direct suppliers. In the tool we use for this purpose, we take advantage of the option to remove from the analysis those direct suppliers from which our purchasing volume was less than €10,000 within a defined time period. Another filter we can apply concerns suppliers whose business relationship will end in the foreseeable future.

The actions to reduce potential negative impacts on workers in the value chain and their effect are defined in a standardized catalog that is applicable groupwide. The group company responsible for the respective supplier is responsible for choosing specific actions from this catalog.

The HSR is assessed centrally each month by the system and the results notified to all those in the group with responsibility for implementation. The target value of 53.9% for this reporting year was exceeded. In fact, a figure of 43.9% was achieved.

The HSR target values were defined by the Supervisory Board of thyssenkrupp AG in fiscal year 2023 / 2024 and are a component of the LTI for the Executive Board and managers and of the NFTs. A description of the NFTs can be found in subsection "SBM-1" in the section headed "ESRS 2 General disclosures."

The affected stakeholder group was not explicitly involved in formulating the targets. However, the content was developed in cooperation with various internal departments such as the Sustainability department in Purchasing and Human Resources. We identify improvement potential in connection with our implementation of human rights and environmental due diligence obligations in the course of the annual effectiveness review of the overarching SCA risk management system (see subsection "S2-4"). In addition, there may be a need for action at short notice due to a deterioration in the HSR, reports received via our publicly accessible complaints procedure, identified violations and audits and the associated interviews with workers in the supply chain.

Regarding job security for workers in the supply chain, thyssenkrupp has currently not formulated any target because there is no concrete indication of actual violations or problems.

ESRS S3 Affected communities

We are conscious of our corporate responsibility and accord great significance to the impacts of our business activities on affected communities – both in our own operations and those in our value chain. Affected communities are among the relevant stakeholders for thyssenkrupp and include neighbors, local communities and indigenous peoples. By way of forward-looking risk management and consistent sustainable practices, we minimize potential negative impacts on affected communities and establish the basis for a trust-based and long-term relationship with them.

The broadly defined term of stakeholders and their perspectives are explained in the section headed "ESRS 2 General disclosures."

Strategy

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

As an international industrial and technology group, thyssenkrupp is active in various sectors and depends on a large number of global value chains. Due to our diversified business model and global activities, communities – including indigenous population groups – in regions where raw materials are extracted and processes in the upstream value chain and along the downstream value chain may potentially be impacted by our business activities.

In detail, we deem affected communities to be those communities and population groups that are or may be affected directly or indirectly by the company's activities, projects and business performance. They include neighbors, local communities and indigenous peoples whose quality of life, environment and social structure are or may be affected by thyssenkrupp's economic activities and decisions.

In the context of our double materiality assessment, groupwide risk analysis and the risk analysis in accordance with the LkSG (see also subsection "S3-1" and the section headed "ESRS S2 Workers in the value chain"), we review whether and to what extent our operations may impact these communities. We systematically consider relevant affected groups. Any findings are used in designing our groupwide actions to comply with our human rights and environmental due diligence obligations.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO AFFECTED COMMUNITIES

Topic	Category[1]	Description	VC[2]	TH[3]
Communities' economic, social and cultural rights	I (-)	Operations in the upstream value chain that contribute to environmental pollution, reduced food supply, restricted habitat or land-use conflicts may also have a detrimental effect on the economic, social and cultural rights of affected communities.	U	M
	I (-)	Operations that emit polluting substances may contaminate the soil, water and air, which may result in food scarcity and health impacts on affected communities.	U, Op	M
	I (+)	Our support in promoting and ensuring sustainable development – for example, in basic infrastructure – may result in added value for affected communities.	U	M
	I (-)	Inadequate safety practices in the upstream value chain may have negative impacts on the property, health, safety and well-being of affected communities.	U	S, M

[1] I = impact; (-) = negative; (+) = positive; R = risk; O = opportunity
[2] VC = value chain; U = upstream; Op = own operations; D = downstream
[3] TH = time horizon; S = short-term; M = medium-term; L = long-term

Our double materiality assessment identified material potential negative and positive impacts on affected communities almost solely in the upstream value chain. Risks and opportunities were not identified. This is due to the nature of our business activities: thyssenkrupp generally does not maintain direct relationships with the affected communities in the supply chains and is not operationally dependent on their involvement. Nevertheless, we are conscious of the fact that our business activities may have an indirect impact, especially on neighbors, local communities, indigenous population groups and other stakeholders in our suppliers' regions.

Material negative impacts

The potential negative impacts on affected communities identified by our double materiality assessment in our upstream value chain include pollution of the soil, air or water and the extraction of natural resources, which may impair health, reduce the supply of food, restrict habitat or provoke land-use conflicts for affected communities. Non-compliance with occupational safety standards may have impacts outside the immediate operational context, for example, if occupational accidents negatively affect the life, health and property of neighboring communities or those in close proximity.

Those material potential negative impacts identified may negatively affect the quality of life in affected communities. Due to the possible reach of these impacts, they are classified as systematically widespread. This classification takes account of the risks customary in resource-intensive sectors, external studies and guidelines, and the geographical distribution and complexity of our global supply chains. It is also included in the double materiality assessment, which is reviewed and updated when new information becomes available from audits, complaints and dialog with stakeholders.

Material positive impacts

As part of our commitment to a responsible and sustainable supply chain, we require our suppliers to contribute to strengthening local structures by providing basic infrastructure, for example. This action may have potential positive impacts on local living conditions.

Basis of our insights relating to potentially affected communities

Our understanding of the characteristics of potentially affected communities and of their specific contexts is primarily based on our dialog with relevant stakeholders, our participation in industry initiatives, the assessment of relevant guidelines and findings from our risk analysis in accordance with the LkSG and from our groupwide complaints mechanism.

At the present time, we have only limited ability to formally describe characteristics and contexts that are indicative of particularly vulnerable groups such as indigenous peoples. Based on international guidelines, groups are considered particularly vulnerable if they are structurally disadvantaged or may be affected disproportionately by human rights or environmental risks. However, we are working to systematically expand our knowledge so that we can identify potential negative impacts on affected communities at an early stage. Further details can be found in subsection "S3-4."

Impact, risk and opportunity management

S3-1 – Policies related to affected communities

To mitigate the material potential negative impacts explained in the previous subsection, thyssenkrupp has committed to implementing the policy for human rights and environmental due diligence obligations in its own operations and in the supply chain. Further details of the policy can be found in subsection "E2-1" in the section headed "ESRS E2 Pollution."

This policy has the goal of protecting human rights and complying with environmental and occupational safety standards. Communities are to be protected especially from practices such as illegal land theft by respecting and guaranteeing fundamental rights of ownership, access to water, and cultural and social integrity. Compliance with environmental standards contributes to preventing pollution and the excessive use of natural resources. This establishes the basis for protecting the livelihoods of affected communities and may have indirect consequences such as food scarcity or health impairments as a result of contaminated soil and water. Occupational safety measures contribute to preventing accidents or technical problems that could have a negative impact on neighboring communities.

We have not formulated our policy as a separate policy but embedded it in documents including the Group Operating Instruction on the implementation of human rights-related and environment-related due diligence obligations, the Principles of compliance with human rights and environmental due diligence requirements, the SCoC and our Group Policy Procurement Principles.

Through its SCoC, thyssenkrupp requires its suppliers to comply with binding minimum standards. These relate to, for example, occupational safety and health, the ban on causing harmful soil changes, water and air pollution, harmful noise emissions or excessive water consumption if these are capable of impairing the natural basis of food production, blocking access to clean water or sanitary facilities or causing harm to human health. In addition, the unlawful annexation of land, forests or water sources that serve to ensure a person's livelihood is prohibited.

If violations of these requirements become known, actions must be taken without delay to end or minimize these violations. thyssenkrupp supports its suppliers in fulfilling their responsibilities and implementing the necessary improvements. In this way, thyssenkrupp contributes to providing and ensuring sustainable development in the upstream supply chain. The last resort is to terminate the business relationship with the supplier.

On-site supplier audits are used to review on a sampling basis whether suppliers actually satisfy the requirements formulated in the SCoC. The audits provide direct insights into the local situation so that potential violations of labor law or pollution can be identified at an early stage. When deciding to conduct an audit, group companies should give particular priority to those suppliers with elevated risk potential. To ensure that the perspectives of affected groups are considered in decision-making processes, thyssenkrupp engages in initiatives such as the UN Global Compact, econsense and those of the German Industry Association. These are forums for dialog about proven processes; they also work on the continuous development of human rights standards.

Risk management system and risk analysis

Our policy for human rights and environmental due diligence obligations underscores the importance of taking responsibility for dealing with negative impacts. The risk management system established in the context of implementing the requirements of the LkSG serves to identify, assess and minimize human rights and environmental risks in our supply chain. Each supplier is assigned to a risk category on the basis of the findings. Prioritization takes account of the established risk, our assumed contribution to the cause, the degree of our influence and the specific operation. The risks identified are used as the basis for preventive action that we take to minimize human rights or environmental risks. Suppliers that account for a smaller purchasing volume or those with which termination of the business relationship is imminent are not in focus. If thyssenkrupp becomes aware of any violations of a human rights or environmental obligation at a direct or indirect supplier, immediate and appropriate action should be initiated by thyssenkrupp aimed at ending this violation.

Although thyssenkrupp does not have a separate policy to prevent and mitigate negative impacts on indigenous peoples, the topic of land theft is integrated in our risk management system so that this kind of risk can be identified at an early stage and remedial action implemented. Land theft may have serious consequences such as forced evictions, violence and discrimination of indigenous groups. Further information on the risk management system in accordance with the LkSG can be found in subsection “S3-3.”

International standards

Our policy is based on the content of the UNGPs, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. The processes we use to monitor compliance with the aforementioned frameworks are described in the section headed “ESRS S2 Workers in the value chain.” If national legislation contains provisions that are more extensive than those prescribed by thyssenkrupp, the national legislation shall prevail. We also expect our group companies, managers, Executive Board and management team members, other employees and suppliers to comply with the principles of the United Nations Global Compact, the International Bill of Human Rights of the United Nations, international agreements concerning civil, political, economic, social and cultural rights, and the ILO Core Labor Standards.

Although thyssenkrupp’s material impacts on affected communities are found mainly in the upstream value chain, we embrace our responsibility to prevent material potential negative impacts. For this reason, our policy on human rights and environmental due diligence obligations specifies that both our suppliers and all stakeholders in our business comply with our requirements. In the reporting period, no cases of non-compliance with the UNGPs, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises were identified in which affected communities were involved due to our own operations or those of our direct suppliers.

At thyssenkrupp, the group regulation on environmental and energy management and the occupational safety and health policy apply. By complying with the occupational safety and environmental standards formulated there, we contribute to reducing negative impacts on affected communities that result from the business activities at our own sites. Further information can be found in the sections headed “ESRS E2 Pollution” and “ESRS S1 Own workforce.”

S3-2 – Processes for engaging with affected communities about impacts

The accessible whistleblower system that is available to affected communities via thyssenkrupp's website is an established reporting channel in accordance with the LkSG. It can be used to report potential or actual human rights or environmental violations anywhere in our value chain. If a group company establishes that a violation of a human rights or environmental obligation has already occurred or is imminent, it must take appropriate remedial action without delay. Over and above this process, there is currently no approach to actively involve affected communities within the supply chain. Further information on the complaints procedure can be found in subsection "S2-3" in the section headed "ESRS S2 Workers in the value chain."

In addition to the structured reporting channel via the whistleblower system, thyssenkrupp values direct dialog with affected communities, especially in respect of locally relevant projects such as the construction of the new direct reduction plant. Measures include community dialog events with experts and the regular participation by the Corporate Citizenship Team in round-table discussions in neighboring districts. During so-called neighborhood walks, our employees initiate a direct dialog with residents to provide transparency, answer questions and foster corporate citizenship in the neighborhood.

S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns

Approach for implementing remedial action

We work continuously to analyze the human rights and environmental impacts of our own business activities in order to minimize possible negative consequences and prevent their occurrence. This is also based on the policy on human rights and environmental due diligence obligations described above, which is characterized by an integrated and interdisciplinary risk management system that includes risk analyses, processes to implement preventive and remedial actions, the definition of responsibilities, the publication of principles, the maintenance of a complaints procedure, and documentation and reporting.

thyssenkrupp has implemented preventive and remedial actions in its own operations and in the upstream supply chain to respond at an early stage to human rights or environmental challenges and prevent negative consequences. In our upstream supply chain, this includes acceptance of the thyssenkrupp SCoC and the performance of supplier training, for example. If we have identified an elevated risk potential at a supplier, we expect them to make a contractual commitment to complying with our human rights and environmental due diligence expectations. This includes agreeing to individual preventive or remedial action such as supplier audits. A particularly serious violation by a supplier may result in the temporary suspension or even immediate termination of the business relationship. These actions are aimed at, for example, identifying and minimizing negative human rights and environmental impacts in the supply chain at an early stage. They include potential negative impacts on affected communities, such as pollution, inappropriate safety practices or interventions in their livelihood.

As well as implementing our actions, key corporate functions, responsible persons and bodies in the respective segment – up to and including the SCA Officer Group – are to be informed and involved. In addition, a root cause analysis and final effectiveness review must be carried out.

Channels for raising concerns and their effectiveness

It is our understanding that assuming responsibility for good working conditions worldwide, especially in the areas of human rights and environmental protection, and for the application of certain principles and standards by our business partners means providing processes and systems for communication with thyssenkrupp. This applies in particular to channels that can be used to report violations of laws and our standards.

As we wish to identify and remedy violations at an early stage, various official reporting channels are available to all thyssenkrupp employees (alongside the essential open communication culture within the company), as well as to customers, suppliers and other third parties (e.g., those directly affected, persons with knowledge of a suspected violation at direct/indirect suppliers). Further information on our reporting channels can be found in subsection "S2-3" in the section headed "ESRS S2 Workers in the value chain."

However, it is difficult to make a reliable estimation of the extent to which potentially affected communities, such as neighbors, local communities, indigenous peoples or communities located in the supply chain, are aware of our whistleblower system and consider it to be trustworthy due to the number and diversity of these groups. This information is not recorded systematically at present.

We protect the interests of whistleblowers, not only through our whistleblower system but also through our commitment to treat the reports we receive in confidence; we do everything possible to protect whistleblowers who act in good faith against any disadvantages that result from submitting a report. That is why they may submit reports entirely anonymously if this is legally permissible. thyssenkrupp treats all reports received from whistleblowers with the utmost diligence and confidentiality and undertakes to comply with all applicable data protection laws. The Compliance Investigations department of thyssenkrupp AG has central responsibility for managing the whistleblower system for the thyssenkrupp group. Reports of possible violations are processed by a Compliance Officer of thyssenkrupp AG. Depending on the individual case, reports of violations that do not relate to core compliance matters (corruption prevention, antitrust law, data compliance, money laundering and trade compliance) may be transferred to the responsible organizational unit or processed in collaboration with this unit. Violations of global minimum labor standards at thyssenkrupp can be reported as violations of the IFA to the International Committee – a codetermination body. In addition to recognition of the ILO Core Labor Standards and the Universal Declaration of Human Rights, these minimum standards include principles for occupational safety and health, options for professional and personal development, the right to adequate compensation, a ban on child and forced labor and a ban on all forms of discrimination.

thyssenkrupp bans and will not tolerate any form of reprisal (e.g., unfavorable actions, disciplinary measures, threats and intimidation) for reports of violations made in good faith or for cooperation in investigating a violation. The corresponding regulations are contained in the rules of procedure for whistleblowing at thyssenkrupp. Knowingly reporting incorrect information (malicious report) is itself a violation and actions taken as the result of such a malicious report are not reprisals.

In its investigations, thyssenkrupp makes every effort to protect the legitimate interests of other persons affected by a disclosure. Raising suspicion against another person may have serious consequences. thyssenkrupp is committed to conducting its investigations strictly on the presumption of innocence and the need-to-know principle.

S3-4 – Taking action on material impacts, risks and opportunities related to affected communities and the effectiveness of those actions

thyssenkrupp pursues the goal of meeting its human rights and environmental due diligence obligations and, as far as possible, of not causing or contributing to the occurrence of negative impacts on affected communities as a result of its business activities. The basis for this are groupwide regulations and management systems aligned with internationally recognized standards for the respect of human rights, including the rights of affected communities. We expect the same of our business partners, who commit to complying with these standards and minimum requirements.

We are conscious of the fact that negative impacts on affected communities may occur despite our regulations and management systems. The double materiality assessment at thyssenkrupp has shown that potential negative impacts occur primarily in the upstream value chain, especially as the result of inadequate occupational safety or environmental management practices by suppliers. Accordingly, we have established measures for responsible procurement as part of our due diligence obligations in order to address material actual and potential negative impacts.

As far as possible, these measures aim to prevent material potential negative impacts in our upstream supply chain by requiring our suppliers to comply with binding minimum standards as specified in our SCoC. These requirements include standards in the areas of environmental management and occupational safety. Their implementation not only aims to reduce negative impacts for employees but also to prevent potential negative impacts for neighboring communities from, for example, pollution at suppliers' sites or accidents at work that could have impacts on the neighboring communities at plants. To review compliance with these minimum standards, we use internal processes like risk management in accordance with the LkSG as well as supplier audits and self-declarations from our suppliers. Further details can be found in the section headed "ESRS S2 Workers in the value chain." In addition, we require our suppliers to implement preventive and remedial actions to remedy or minimize actual or potential negative impacts that are identified. As part of our risk management system relating to the implementation of human rights and environmental due diligence obligations, we have taken structured actions to address aspects such as material negative impacts on affected communities in the upstream value chain and risks to the undertaking. Further details of the actions relating to human rights and environmental due diligence obligations in our upstream value chain can be found in subsection "S2-4" in the section headed "ESRS S2 Workers in the value chain."

To further reduce potential negative impacts in the area of sustainability in our supplier portfolio, we have implemented an appropriate catalog of actions. The goal is to continuously reduce the proportion of suppliers classified as high-risk and minimize the general potential negative impacts in our supply chain. These actions are aimed at ensuring that our human rights and environmental due diligence obligations not only exist in theory but are also integrated in our processes.

The actions we take in the context of responsible procurement are not only aimed at preventing and mitigating negative impacts but may also support positive impacts on affected communities. For example, within the context of responsible development, we require our suppliers to contribute to strengthening local structures by providing and ensuring basic infrastructure such as wastewater disposal. Such actions may create substantial added value for the affected communities and contribute to the long-term improvement of their economic, social and environmental conditions. Compliance with these minimum standards is binding for our business partners. If violations are identified, we require the affected suppliers to implement suitable corrective action. If no adequate improvement is achieved, we reserve the right to suspend or terminate the business relationship as a last resort. Although our double materiality assessment has shown that negative impacts mainly occur in the upstream value chain, we take our responsibility in our own operations equally seriously. Against this backdrop, we seek to continuously identify potential negative human rights and environment impacts and take actions to prevent them. To reduce potential negative impacts on affected communities at our own sites, thyssenkrupp has implemented environmental management and occupational safety actions. Further information can be found in the sections relating to the environment and in subsection "S1-4" in the section headed "ESRS S1 Own workforce."

Moreover, social responsibility is firmly anchored in our corporate culture. thyssenkrupp regards itself as an active corporate citizen. We want to engage positively with the communities around our locations and support the people who live there. We want to help solve the challenges currently faced by society and use our entrepreneurial skills for the common good. In our corporate citizenship activities, we are guided by our slogan "engineering.tomorrow.together." For this reason, thyssenkrupp promotes enthusiasm for technology and innovation, education, and local engagement. When natural disasters occur, group employees and companies participate in fundraising activities for the affected regions, organizations and people. In the reporting year, group companies at our sites worldwide engaged in and supported a range of local projects, collaborations, multi-stakeholder initiatives and associations in line with the respective local possibilities and needs.

Metrics and targets

S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

By implementing the HSR metric, we record 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.

The HSR metric is a key management element for identifying and minimizing material potential human rights and environmental impacts in the upstream supply chain, thus contributing to limiting negative impacts on affected communities in the upstream supply chain. Further information on the HSR metric can be found in subsection "S2-5" in the section headed "ESRS S2 Workers in the value chain."

thyssenkrupp requires its suppliers to comply with minimum standards in the areas of human rights and environmental due diligence obligations. With these standards and the implementation of corresponding risk mitigation actions, we aim to contribute to supporting sustainable development in affected regions. There is currently no targeted management of potential positive impacts through measures such as investments or development projects.

4. Governance

ESRS G1 Business conduct

At thyssenkrupp, corporate governance is synonymous with responsible corporate management and control geared to long-term value creation. For us, good corporate governance concerns all areas of the thyssenkrupp group, including the respective sustainability matters. Further information can be found in the "Corporate governance statement."

Strategy

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The table below explains the material impacts, risks and opportunities relating to corporate governance that were identified by the double materiality assessment performed and are significant to thyssenkrupp's operations and business model.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO CORPORATE GOVERNANCE

Topic	Category[1]	Description	VC[2]	TH[3]
Corporate culture	O	A corporate culture that fosters sustainability, social responsibility and ethical corporate governance may have a positive impact on thyssenkrupp's reputation, attractiveness as an employer and employee retention.	Op	/
Political activities and lobbying	I (+)	A forward-looking and direct dialog between us and political decision-makers and our membership in industry associations in order to foster the sustainable transformation of industry may have positive impacts on the environment and society.	Op	M, L
	O	A strategic awareness for regulation as the result of lobbying activities and a sustainable contribution to shaping the regulatory environment may have a positive impact for thyssenkrupp.	Op	/
Management of relationships with suppliers, including payment practices	I (+)	The integration of ESG criteria into our supplier selection process and the requirement that our suppliers exceed minimum standards may have positive impacts on the environment and society.	U	S, M
	R	The loss of key products as the result of offboarding suppliers, especially those with a de facto monopoly, represents a production risk for thyssenkrupp.	Op	/
	O	The requirement that suppliers exceed ESG minimum standards may have a positive impact on thyssenkrupp's sales opportunities as the result of brand differentiation vis-à-vis competitors.	Op	/
Corruption and bribery	R	Low ethical standards in business conduct may result in bribery, corruption and other violations and may represent a legal and reputational risk for thyssenkrupp.	Op	/

[1] I = impact; (-) = negative; (+) = positive; R = risk; O = opportunity
[2] VC = value chain; U = upstream; Op = own operations; D = downstream
[3] TH = time horizon; S = short-term; M = medium-term; L = long-term

Impact, risk and opportunity management

G1-1 – Business conduct policies and corporate culture

As a globally operating company, thyssenkrupp carries a high degree of corporate responsibility. We are required to comply with many legal requirements and endeavor to successfully implement our own targets. Against this backdrop, corporate governance and corporate culture are of central importance to the long-term success of our business and to ensuring the trust of our business partners, our employees, the public and our other stakeholders. They form the basis for our business conduct.

We regularly and systematically evaluate our corporate culture using the groupwide Employee Pulse Check, a short online survey of employee satisfaction and material success factors for change, such as leadership, culture and communication. Those responsible for the businesses receive the business-specific findings, enabling them to work on targeted improvements. Further information on the Employee Pulse Check can be found in subsection "S1-2" in the section headed "ESRS S1 Own workforce."

The basis for corporate governance and the corporate culture are the principles of conduct, which are summarized in our Code of Conduct. This expresses our core values and provides guidance on compliance, integrity and ethically correct conduct for all group companies, the Executive Board and management team members, managers and all employees. It covers our conduct and responsibility as a member of society, as well as our conduct in day-to-day business and at the workplace. Corporate policies and agreements give substance to the rules and regulations for individual situations and matters based on the Code of Conduct. Further information on the Code of Conduct can be found in subsection "S1-1" in the section headed "ESRS S1 Own workforce."

Our compliance program is aimed at anchoring a sustainable value culture within the company. It requires that there is an awareness of internal rules and policies across the company and that business practices are legally compliant. Through the close integration of the internal control system and risk and compliance management, we aim to identify and assess risks at an early stage and decide on suitable actions. Our compliance program covers matters including binding policies, training, communication formats and individual advice. thyssenkrupp fosters a speak-up culture which encourages employees to express concerns about potential violations of the rules or unethical conduct at an early stage. Confidential reporting channels are available to ensure the protection of whistleblowers. Any violations are investigated and sanctioned systematically. Details can be found in the section headed "ESRS S2 Workers in the value chain."

thyssenkrupp regularly reviews its groupwide compliance program, lastly in fiscal year 2023 / 2024. On July 31, 2024, KPMG AG reviewed the appropriateness, implementation and effectiveness of the compliance management system, also in the area of corruption prevention. The findings of the external audit, which were positive from the perspective of thyssenkrupp, are contained in the KPMG reports for the individual core compliance matters – including corruption prevention – that can be accessed on the thyssenkrupp website.

The global compliance organization headed by the Group General Counsel and the Chief Compliance Officer discusses strategic decisions. A high double-digit number of compliance employees are active worldwide. At the group companies, compliance managers – usually the managing directors – are responsible for implementing the thyssenkrupp compliance program and serve as a point of contact for employees.

thyssenkrupp offers a wide range of classroom-based and e-learning courses on core compliance matters such as corruption prevention. The training formats are selected, designed and regularly updated in a risk-based approach so that they satisfy changed legal requirements, the various business models of the thyssenkrupp group and the findings of the risk assessments and compliance audits. The responsible compliance manager selects the employees to attend classroom-based training, also in a risk-based approach. The participants in e-learning courses are selected by group company employees on the basis of the uniform groupwide training catalogs. Employees must repeat the compliance e-learning courses after any updates but as a rule after three years at most.

Further information on our compliance program can be found in the subsection headed "Compliance"; further information on our governance framework and risk management can be found in the subsection headed "GOV-1 – The role of the administrative, management and supervisory bodies" and in the "Corporate governance statement."

G1-2 – Management of relationships with suppliers

The situation in the global supply chains has a direct impact on thyssenkrupp's corporate success. As geopolitical tensions continue and greatly impact supply chains, it is especially important that we have risk-resilient business partners on the procurement side. We therefore endeavor to ensure that our ESG requirements are satisfied across the entire supply chain; our supplier management is the basis for this. It is also crucial to increasing our customers' satisfaction and achieving our ESG targets.

Policies for implementing our requirements

We implement our requirements towards our business partners through our policy on human rights and environmental due diligence obligations, which is described in subsection "E2-1" in the section headed "ESRS E2 Pollution" and in subsection "S2-1" in the section headed "ESRS S2 Workers in the value chain." The basis for this is provided by the values and principles for conduct contained in thyssenkrupp's SCoC, confirmation of which we require at the start of a supplier relationship. In this way, we address the respect for and compliance with fundamental due diligence obligations relating to environmental protection, human rights and working conditions. For their part, suppliers are expected to establish control and monitoring systems to ensure that their subsuppliers also comply with these principles in the same quality, address violations and take appropriate actions to achieve long-term compliance with our requirements. Our suppliers are notified that termination of the contractual relationship is possible in the event of serious violations.

In our SCoC, we have formulated that thyssenkrupp not only awards contracts on the basis of legal, economic, technical and process criteria, but also social, environmental and ethical criteria. We expect the same from our suppliers and their subcontractors. In its own Code of Conduct, thyssenkrupp commits itself and its employees to complying with all applicable bans and obligations, even if this should result in short-term disadvantages for thyssenkrupp or individual persons. It is in this context that we seek to treat each of our suppliers fairly.

The central aspects of the policy – thyssenkrupp's Group Policy Procurement Principles and the Group Operating Instruction for the implementation of human rights and environmental due diligence obligations – commit all relevant employees to include the sustainability requirements in all contracts with suppliers and to apply sustainability criteria in selecting suppliers. In this way, we can potentially influence possible environmental, human rights and occupational safety impacts of our suppliers' activities.

Payments to suppliers

Longer terms of payment may have serious consequences for small and medium-sized undertakings especially. In line with our mission statement and Code of Conduct, in which we commit to reliability, honesty, credibility and integrity, we therefore aim to make payments as agreed contractually. As of the end of the fiscal year, thyssenkrupp currently has no additional policy to prevent late payments to suppliers. We have not identified any indication that suppliers of the thyssenkrupp group are treated differently in respect of terms of payment or payment behavior because of their size. Further information can be found in subsection "G1-6" in this section.

Risk assessment

We seek to avoid the inclusion of new high-risk suppliers as a matter of principle. We classify existing suppliers with an annual procurement volume of €10,000 or more regarding their sustainability risks using an internal management and monitoring system (see also the discussion of the HSR in subsection "S2-5" in the section headed "ESRS S2 Workers in the value chain"); if elevated risks are identified, we expect the supplier to work with us to take risk-preventing actions. The goal is to ensure clarity regarding our expectations of suppliers and to avoid from the outset any situations that might impede or even block our company's market access as the result of poor ethics or sustainability-related efforts. The last resort is to terminate the business relationship.

In our relationships with suppliers, we consider risk aspects in the supply chain and impacts on sustainability matters. The basic ESG risk analysis provides us with a set of external risk scores relating to environmental protection, for example, in respect of climate change, carbon dioxide and greenhouse gas emissions, environmental regulation and waste management scores. The topic of biodiversity is also covered.

Other risk scores ensure the consideration of working conditions on site, for example, scores relating to occupational safety, adequate wages, discrimination/equal treatment, working time and freedom of assembly. In addition, this risk analysis examines aspects of respect for human rights such as local water and air pollution, the right to privacy, the rights of (sexual) minorities, forced labor, slavery, women's rights, child labor and the use of violence by security forces. This also covers the economic, social and cultural rights of affected communities.

In fiscal year 2024 / 2025, thyssenkrupp used an interdisciplinary risk management system. Further details can be found in subsection "S2-1" in the section headed "ESRS S2 Workers in the value chain." An IT-based analysis of the aforementioned abstract ESG risk positions for all relevant suppliers provides us with transparency about industry- and region-specific ESG risks. On the basis of these findings, we took supplier-specific preventive action in individual cases and as judged by the business units that have direct contact with potential high-risk suppliers in order to reduce any possible ESG risks. Further information can be found in subsection "S2-4" in the section headed "ESRS S2 Workers in the value chain."

If it is found that a supplier has already violated a human right or environmental obligation or such a violation is imminent, we focus on the necessary remedial action. Further details of this can be found in subsection "S2-4" in the section headed "ESRS S2 Workers in the value chain." As part of the risk analysis, the abstract supplier-related risks are continuously adjusted. This is based on the type of violation and the implementation status of the actions decided.

The findings of the risk analysis are considered in supplier selection and in our supplier qualification process prior to establishing a business relationship. Further details can be found in subsection "S2-4" in the section headed "ESRS S2 Workers in the value chain." In this way, we can directly influence possible environmental, human rights and occupational safety impacts which may arise from our suppliers' activities.

We seek to establish stable business relationships on the basis of this strategy of active collaboration and communication with our suppliers.

G1-3 – Prevention and detection of corruption and bribery

The compliance program at thyssenkrupp focuses particularly on avoiding corruption and bribery. Our ambition is for our business success to be based solely on the quality of our products and services. We categorically reject corrupt conduct and bribery. To this end, we are also a signatory to the UN Global Compact and take account of international corruption prevention regulations, including the UN Convention against Corruption (UNCAC). Our compliance program also covers the many elements relating to corruption and bribery, such as binding guidelines, training courses, communication measures and individual advice.

In order to identify and investigate misconduct, the Executive Board of thyssenkrupp AG has appointed the Legal & Compliance Investigations department (Compliance Investigations for short) to investigate reports and allegations relating to possible compliance-related misconduct. Compliance Investigations reports to the Chief Compliance Officer, who reports in turn to the CEO. The department conducts regular and proactive audits as well as ad hoc investigations, especially in connection with the core compliance matters of antitrust law, corruption prevention, money laundering, data compliance and trade compliance. The goal is to identify risks at an early stage and to review the effectiveness of the compliance management system.

Violations may be reported via various channels including a publicly accessible, electronic whistleblower system, hotlines, emails or compliance contacts; if legally permissible, reports may also be submitted anonymously. All reports must be treated in confidence. Whistleblowers are protected from possible disadvantages. If violations are identified, actions are initiated and their implementation monitored. We also work closely with those responsible for compliance in the group segments, especially in respect of local authority proceedings. Information on ongoing and completed proceedings is recorded centrally, processed for internal quarterly and annual reporting and then reported.

The compliance managers of the thyssenkrupp companies are notified of binding new compliance guidelines (policies, group regulations and group operating instructions), supporting documents and updates, which are made available centrally via the tk documentdesk, a groupwide IT platform. The implementation and communication of the compliance guidelines is the decentral responsibility of the compliance managers. Implementation of the compliance guidelines must be confirmed in the annual ICS process. Our compliance guidelines are also a feature of compliance e-learning courses, in which the participants confirm that they have been made aware of the guidelines.

The Compliance@thyssenkrupp e-learning course teaches basic knowledge about the thyssenkrupp Code of Conduct and compliance, including corruption prevention in the group, information on our whistleblower system and the contacts for whistleblowers. The course is automatically assigned to all employees with an email address. In addition, a specific e-learning course on corruption prevention is available for use in a risk-based approach. This course communicates content such as conflicts of interest, dealings with public officials, the appropriateness of invitations, gifts, delegation trips and donations, and general corruption risks; the knowledge acquired is reviewed in a concluding test. Our e-learning courses are complemented by classroom-based training for specific target groups and risks. These also communicate content in the area of corruption prevention, for example, dealings with business partners, conflicts of interest, donations and sponsorship, invitations and gifts. Current training data can be found in the subsection headed “Compliance.”

The members of executive boards, management teams and other management bodies, as well as thyssenkrupp employees who are delegated to the supervisory boards or comparable supervisory bodies of other thyssenkrupp group companies or investments are required to participate in binding training programs on preventing corruption and bribery. In the reporting year, the members of the Supervisory Board of thyssenkrupp AG received instruction on corruption prevention and bribery by way of a written document.

On the basis of risk aspects, employees with purchasing and sales responsibility or with direct or indirect influence on the corresponding processes, employees in administrative functions with external contact – especially with customers, suppliers, service providers and authorities – members of executive boards and management teams, group executives, managers with human resources responsibility and participants in industry and association events are especially relevant in respect of corruption and bribery. In the past three years, around 90% of these employees received training in e-learning or classroom-based courses.

Metrics and targets

G1-4 – Incidents of corruption or bribery

In fiscal year 2024 / 2025, there were no incidents of corruption or bribery that resulted in the company being prosecuted or receiving a fine.

G1-5 – Political influence and lobbying activities

At thyssenkrupp AG, political lobbying is performed by the Corporate Function Communications, which reports directly to the CEO of thyssenkrupp AG. Therefore, the responsibility for political lobbying is assigned to the CEO directorate of thyssenkrupp AG.

The main principles and rules for political lobbying are contained in our Code of Conduct. In addition, thyssenkrupp has a group policy governing all activities relating to our political activities and points of contact. In particular, this relates to the following activities:

- Political activities and lobbying
- Individual membership (not private) in industry association boards, working groups and initiatives relating to political topics for thyssenkrupp, such as professional associations
- Drafting of position papers in the aforementioned associations, working groups and initiatives
- Contact and meetings with politicians, decision-makers and public officials, visits by and meetings with these persons
- Participation in business delegations during official government visits
- Publication of politically relevant content

This group policy also states that political activities should be coordinated, open and transparent and that regulatory and ethical standards must be complied with. In addition, the group policy describes the fundamental goal of political activities. Through these and its lobbying work, thyssenkrupp seeks the inclusion of its interests in the policy-making process by political representatives so that it can achieve its own business ambitions. The group policy currently does not explicitly address the impacts and opportunities identified in the double materiality assessment for the topic area of “political influence and lobbying activities.”

In addition, thyssenkrupp has committed in its Code of Conduct to not make any direct or indirect financial payments and contributions in kind to political parties, to organizations affiliated with or resembling political parties, or to politicians or candidates for elected office. The Code of Conduct applies to all thyssenkrupp companies, employees, managers and members of the Executive Board and management teams. Our goal is to ensure that thyssenkrupp’s political lobbying complies with the principles of integrity and professionalism and that the company does not exert undue influence on policy and legislation. Moreover, no Executive Board or Supervisory Board member of thyssenkrupp AG held a comparable role in a public administration or regulatory authority in the two years prior to their appointment to their respective functions.

thyssenkrupp AG is included in the German Parliament lobby register (register number: R001468) and the European Union Transparency Register (register number: 991340152782-87). In addition, certain thyssenkrupp subsidiaries have separate entries in the German and European registers:

- thyssenkrupp Decarbon Technologies GmbH (527995398085-85)
- thyssenkrupp Marine Systems GmbH (R003238)
- thyssenkrupp nucera AG & Co. KGaA (R003302 and 326446553312-61)
- thyssenkrupp Polysius GmbH (R006215)
- thyssenkrupp Steel Europe AG (R001828 and 456211534646-58)
- thyssenkrupp Uhde GmbH (R006245)

Focus of political lobbying

Through its political lobbying, thyssenkrupp seeks to be a partner and advisor to the government and to work with the government to facilitate the green transformation of industry, strengthen its competitiveness and drive other key industry policy matters such as the strategic autonomy of Germany and Europe. We aim to actively shape the economic policy framework. To achieve this, it is essential to maintain an ongoing and regular dialog with political stakeholders. thyssenkrupp is focusing on the following topics:

Green transformation – To ensure the success of the green transformation, we believe it is necessary to promote technologies and processes as broadly as possible. This applies especially to ramping up the hydrogen economy. Once this has been completed, the comprehensive decarbonization of industrial processes and energy supply will be possible. En route to a green hydrogen economy, thyssenkrupp is committed to using blue hydrogen during the transition phase. From thyssenkrupp's perspective, it should be possible to use technologies such as carbon capture and storage (CCS) so that industrial processes can be decarbonized as soon as possible. thyssenkrupp is also committed to creating green lead markets in which the use of climate-friendly basic materials – i.e., materials whose production is associated with lower carbon emissions – is incentivized by suitable political framework conditions.

Secure energy supply – Securing stable and competitive energy prices in the long term for Germany and Europe is of crucial importance for thyssenkrupp. This applies both to the price of electricity, which will become increasingly important with the shift to electrification, and to the price of green hydrogen, which is necessary for the green transformation.

Trade defense measures – In recent years, the number of low-price imports from non-EU countries has increased dramatically, especially in the steel industry. That is why thyssenkrupp advocates for effective trade defense measures. Greater use must be made of the scope provided by existing WTO and EU legislation, and new instruments (tariffs) must be established to provide protection against low-price imports from countries with overcapacities. In addition, thyssenkrupp supports effective carbon leakage protection and, for example, is arguing for changes to the Carbon Border Adjustment Mechanism (CBAM) such as an extension of its application to include processed steel-intensive products.

Strategic autonomy – In times of growing geopolitical tensions, it is increasingly important to keep basic technical skills and production capacities in Europe. From thyssenkrupp's perspective, the strategically important industries include plant engineering, naval shipbuilding and steel production. If these competencies are kept in Germany and Europe, it will be easier to protect value chains. thyssenkrupp advocates for resilient and diversified supply chains, the support of a strong European industry base and the retention of technical and industrial skills (Buy European).

Measures in connection with political lobbying

The green transformation of our economy is one of the biggest challenges and, at the same time, one of the biggest opportunities for Germany and Europe. Coordinated solutions are needed to ensure that Germany and Europe remain attractive and competitive industrial locations. Against this backdrop, thyssenkrupp's business conduct is shaped by policy choices and regulation. As thyssenkrupp's steel production – together with the cement industry – is associated with a large proportion of emissions, the most important and effective decarbonization levers focus mainly, if not exclusively, on the political frameworks relating to the environmental transformation of steel production. For this reason, most of thyssenkrupp's political lobbying – in respect of the potential positive impacts and opportunities of direct dialog with policy makers and the shaping of the regulatory environment – is conducted by Steel Europe.

Against this backdrop, thyssenkrupp participates in regular dialog with various stakeholder groups at the regional, federal and EU levels, contributing recommendations on how to achieve the green transformation and sustain the long-term competitiveness of industry in Germany and Europe. In this connection, thyssenkrupp regularly addresses specific regulatory plans, especially those concerning climate change, energy and hydrogen, at national and European level. The thyssenkrupp companies included in the lobby register regularly publish an overview of these regulatory plans. Also listed and described are memberships of associations and the reported financial spending (for example, personnel, infrastructure and representation costs) for political lobbying. In the coming fiscal year, spending is expected to be similar to that in 2024 / 2025.

G1-6 – Payment practices

The general conditions of procurement applied by thyssenkrupp companies also include standard payment terms. The term "standard payment terms" refers to the period for payment contained therein; this is defined by the individual companies. No distinction is made on the basis of supplier category. As a rule, the period for payment is between 60 and 90 days. In deviation from this, it is only 30 days at some European sites and, in exceptional cases, as much as 180 days at some sites of the Decarbon Technologies and Automotive Technology segments in the Far East. Some smaller group companies do not apply standard payment terms but reach individual agreements with their suppliers regarding payment for products or services.

We determine the datapoints that we are statutorily required to report by assessing the available information from the individual ERP systems used by the group's legally independent entities. Around 96% of thyssenkrupp's spending is covered by the reported metric; ERP systems offered no possibility for assessing the remaining 4%. We have not found any indication that the spending that could not be included in the assessment deviates systematically from the spending that is included. The remaining 4% is therefore estimated on the basis of the figure for the 96%.

In the reporting year, the average time between the start of the period for payment and actual payment was 35 days; 75% of payments were made in line with the standard payment terms. In the case of individual agreements on payment terms longer than the standard payment terms, the payment transaction was assessed as not complying with the standard payment terms – even if payment was made in line with the respective individual agreement. Late payments may be caused by the process when slight delays result from weekly payment runs.

As of the reporting date on September 30, 2025, no legal proceedings by suppliers for late payment were pending.