



SURTECO

Sustainable products.
Sustainable business.

Sustainability Report 2025

Non-financial Statement*

ABOUT THIS NON-FINANCIAL STATEMENT

SURTECO GROUP SE is preparing and publishing the combined Non-financial Statement in accordance with §315b and §315c German Commercial Code (HGB) and the Directive (EU) 2022/2464 of the European Parliament and the Council dated 14 December 2022 on the establishment of a framework to facilitate sustainable investments and Article 8 of the Delegated Regulation (EU) 2020/852 (EU Taxonomy Regulation).

CSRD AND ESRS AS A FOUNDATION FOR EUROPEAN SUSTAINABILITY REPORTING

The Corporate Sustainability Reporting Directive (CSRD) represents a substantial expansion of the previous EU Guidelines on non-financial reporting. The directive came into force on 5 January 2023 at EU level and has to be adopted in national law by the EU Member States. One of the aims is to oblige large companies oriented on the capital market in the EU to provide comprehensive disclosure as part of their sustainability reporting, highlighting the impacts of their business operations on sustainability aspects as well as pointing out the influences of sustainability aspects on the performance of their business, the results of operations and the situation of the company. With this purpose in mind, the EU has passed a number of European standards for sustainability reporting in the form of the European Sustainability Reporting Standards (ESRS), adopted as a delegated regulation, which is directly applicable in all EU Member States. The requirements of the current legal framework continue to apply to SURTECO because the national CSRD Implementation Act (CSRD-UmsG) did not come into force in Germany until 31 December 2025.

However, in the expectation of prompt implementation of the CSRD in German law, the SURTECO Group has made comprehensive preparations for first-time reporting in accordance with CSRD and ESRS respectively. The requirements of ESRS were largely implemented in this report on a voluntary basis for the 2025 business year.

STRUCTURE AND METHODOLOGY OF THE NON-FINANCIAL STATEMENT

SURTECO GROUP SE presents a Non-financial Statement at company level and a non-financial group statement jointly as a combined Non-financial Statement. The Non-financial Statement is an integrated element within the management report and complements the management section. In compliance with the requirements of the ESRS, the material topics were selected on the basis of their impact, their relevance and the assessment of their potential financial impacts. Material aspects and circumstances relating to environmental concerns, employee concerns, social concerns, business ethics and compliance, including combatting corruption and bribery, respect for human rights and sustainability in the supply chain are summarized and the content is divided into four sections on the basis of the structural requirements of the ESRS: general disclosures, environmental information, social information and company information.

The individual sections of the Non-financial Statement are based on the structure of the ESRS.

Reconciliation of sustainability matters between HGB requirements and the ESRS framework and contextualisation of the matters.

Sustainability matters	ESRS-framework
Environmental concerns	E1 Climate change E2 Pollution E5 Resource use and circular economy EU-Taxonomy
Employee concerns	S1 Own workforce
Social concerns*	S1 Own workforce G1 Business conduct
Respect of human rights*	S1 Own workforce G1 Business conduct
Fighting corruption and bribery	G1 Business conduct

* Reporting on S2 (“Workers in the Value Chain”) and S3 (“Affected Communities”) is not yet included in this reporting year. Explanations regarding human rights are provided in Chapter G1. The SURTECO Group maintains an ongoing dialogue with regional and local stakeholders at its sites.

The phase-in provisions provided for by the ESRS were not utilized during the reporting year.

General information

ESRS 2 GENERAL DISCLOSURES

This sustainability statement is a consolidated report about the material ESG topics of the SURTECO Group and forms part of the management report. The structure of the report and its disclosures are based on the framework of the Corporate Sustainability Reporting Directive (CSRD).

The group of consolidated companies governed by the sustainability statement corresponds to the companies consolidated in the company’s consolidated financial statements, and the reporting period is the financial year and calendar year 2025. The base year for the achievement of the sustainability goals is the business year 2019. The financial information was denominated in the reporting currency of the euro (€). This sustainability statement also takes into account upstream and downstream activities of the value chain within the course of the reporting year. Information about the intellectual property, know-how and innovations of the SURTECO Group are not disclosed in this report. This reporting makes use of the time horizons defined in ESRS 1 for short-term (< 1y), medium-term (1-5 y) and long-term (> 5 y).

The preparation of the sustainability statement requires to a certain extent decisions of judgement, estimates and assumptions. The material facts that are affected by such decisions of judgement and estimates relate to the definition of the risks and opportunities associated with sustainability. The quantitative disclosures are the result of a consolidated, regular survey of the individual units within the Group. These data were prepared with due care and attention and following a comprehensive review. When the surveys are carried

out by the individual subsidiary companies, there may be unintentional misrepresentation when questions are answered. One example from the past relates to information having been provided in the wrong unit of measurement. If a mistake of this nature was discovered, the corresponding prior-year value was corrected in the report and appropriately identified. If omissions or exceptions to the disclosure of developments were identified, these are also assessed and reported in accordance with the circumstances.

A comprehensive risk assessment in connection with sustainability reporting is included under DR GOV-5 of this section. The data quality here is treated as an important aspect. This evaluation highlights the potential risks and their impacts and outlines the mitigation strategies directed towards continuously improving the quality of the information disclosed in this report.

Governance

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

The composition of the Supervisory Board is based on § 95 Sentence 2 Stock Corporation Act (Aktiengesetz, AktG) in conjunction with Article 8 Section (1) of the Articles of Association and the rules of the contract pursuant to §§ 13 Section (1) Sentence 1, 21 SE Participation Act (SE-Mitwirkungsgesetz) (Law on the Involvement of Employees in a European Company, SEBG) between the special negotiating committee and the executive management of SURTECO AKTIENGESELLSCHAFT about the participation of the employees of SURTECO GROUP SE dated 13 February 2007. According to these requirements, the company's Supervisory Board is made up of nine members. Six members are elected by the Annual General Meeting. All these six members are independent pursuant to the German Corporate Governance Code (DCGK). Three members are appointed as employee representatives to the Supervisory Board in accordance with the provisions of the above-mentioned agreement by the works councils of the three German companies of the SURTECO GROUP with the most employees. Since employees cannot be regarded as independent, as a matter of principle, the proportion of independent members of the Supervisory Board is 66.7 %. The Supervisory Board has defined a target for one female seat on the Supervisory Board by 2030. Up to now, it has not been possible to appoint an appropriately qualified women to the Supervisory Board of SURTECO GROUP SE. The proportion of women on the Supervisory Board during the reporting year 2025 is therefore 0 %.

In order to assess impacts, risks and opportunities in an evidence-based approach, the expertise of the Supervisory Board covers the following areas: paper and paper refinement, production and plastics technology, digital printing, occupational health and safety, human resources and climate economy. The Supervisory Board has appointed Mr. Jörg Wissemann as the contact person for sustainability issues in the Management Board. Mr. Wissemann holds a leading position in the area of sustainability consulting and therefore has extensive expertise in sustainability topics that are important for the company. Together with three other members of the Supervisory Board, Mr. Wissemann is a member of the Audit Committee of the SURTECO Group and is therefore responsible for the review and approval of the sustainability report. The definition of the sustainability targets of the SURTECO Group is carried out in consultation with the Management Board and Supervisory Board and is adopted by these bodies.

The Management Board (Executive Board) currently consists of two members. The Members of the Management Board are appointed and dismissed by the Supervisory Board. Rules of Procedure govern the allocation of business and the cooperation within the Management Board. The Members of the Management Board are not intended to work for the company beyond the statutory retirement age. In addition to the Management

Board, there are two other administrative and management bodies: the Senior Management Team (SMT) and the Executive Management Team (EMT, C Level 1). The proportion of women there was 12 % and 9 % respectively.

The Management Board of SURTECO GROUP SE manages the company with the objective of generating organic economic value added over the long term. The Management Board carries out its functions independently and in the interests of the company, while taking into account the needs of its shareholders, its employees and the groups associated with the company (stakeholders). The Members of the Management Board are jointly responsible for the executive management of the company. The Chairman of the Management Board coordinates the activities of the Management Board. The Management Board develops the company's strategic direction, coordinates it with the Supervisory Board and implements the strategy. The Board ensures compliance with the statutory regulations and internal company guidelines and guarantees that the Group companies comply with these requirements.

The Board of Management has implemented a group-wide Internal Controlling System (ICS), a Risk Management System (RMS) and a Compliance Management System (CMS). The ICS and the RMS also deal with targets related to sustainability. The Management Board is responsible for the risk policy within the SURTECO Group. The identification of risks is carried out by the Management Board on the basis of group-wide guidelines. This is carried out together with the management of the subsidiary companies, Group controlling and the specialist departments. The results are regularly reported to the Management Board, which in turn submits a report to the Audit Committee of the Supervisory Board. The executive management of the subsidiary companies receives the instructions of the Management Board and in this connection is re-sponsible for the risks that it enters into its business activity. The management integrates the employees within the framework of their governance functions into the risk management. Binding rules for the risk management processes are defined within the group-wide Risk Management Manual.

The governance bodies of the SURTECO Group ensured that they possess or have access to the necessary skills and expertise in order to effectively monitor and manage sustainability aspects. In addition to the personal expertise, the governance bodies have access to internal experts who cover a wide range of sustainability aspects:

- Corporate Function Sustainability
- Environmental and Energy Managers
- Occupational Safety Specialists
- HR Specialists
- Compliance and Internal Auditing Teams
- Experts for Supply Chain Management
- Specialists for Operational Excellence

Furthermore, external advisors and specialist committees are available in order to regularly provide information on legal developments and best practices. The sustainability competencies available are directly related to the company's material ESG risks and opportunities. As a result of the structured access to internal experts and external specialists, the company ensures that its management bodies are in a position to take informed decisions directed towards creating long-term values for the company and its stakeholders. A

complete overview of the management bodies of the SURTECO Group can be found in the notes to the financial statements in the section “Executive Officers of the Company”.

The sustainability team appointed by the Management Board is the office with central responsibility for sustainability at the SURTECO Group. It coordinates and manages the sustainability strategy of the Group and makes recommendations for targets and measures. Process owners and sustainability managers at the global locations ensure operational implementation of the sustainability targets. They take over responsibility for the sustainable organization in their area and coordinate activities. The sustainability team communicates with the Management Board through regular reporting and coordinates ongoing action with the Board. As part of strategic controlling for the Group, the Management Board keeps the Supervisory Board, and the Audit Committee informed by providing regular, comprehensive and prompt reports about issues related to sustainability and attainment of targets.

DR GOV-2: Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies

Sustainability management and governance structure

The sustainability management encompasses all entrepreneurial activities that safeguard the sustainable, long-term development of the company in line with the requirements of corporate governance, the environment and social concerns.

The role of the administrative, management and supervisory bodies is clearly defined as set out below:

- The Management Board bears overall responsibility for the sustainability strategy and takes final decisions in regard to measures and investments relating to sustainability.
- A Sustainability Team appointed by the Management Board acts as a central body for coordination and controlling of the sustainability strategy. It develops proposals for targets and measures, monitors their implementation and ensures knowledge transfer within the company.
- Sustainability managers and process owners at locations across the world ensure operational implementation and assume strategic responsibility for environmental, social and economic sustainability aspects in their respective areas.
- The Sustainability Team communicates on a monthly basis with the Management Board and agrees strategic decisions within the scope of Executive Management Meetings and Strategy Meetings.
- The Supervisory Board promptly receives comprehensive information and updates about sustainability topics in the context of Supervisory Board Meetings.
- The Audit Committee of the Supervisory Board deals with sustainability reporting annually and reports its findings to the plenary session.

Employees, process owners and sustainability managers are kept regularly informed through the group-wide management system and the Intranet. People in the public domain receive appropriate information in the Sustainability Report and on the company’s website.

Material sustainability topics during the reporting period under review

During the reporting period under review, the administrative, management and supervisory bodies addressed the following key sustainability issues:

- Reduction of emissions: Development and implementation of CO₂ reduction strategies.
- Use of secondary raw materials: Evaluation of the feasibility and integration of recycling materials into the production process.
- Autonomy in energy supply: Analysis and investments in renewable energies in order to safeguard energy supply.
- Alternative production technologies: Testing and implementation of sustainable manufacturing processes.
- Occupational health and safety: improvement of occupational safety and company healthcare promotion.
- Waste management: Measures for waste avoidance and optimization of disposal processes.
- Circular economy: Development and promotion of closed material cycles.
- Diversity: Implementation and monitoring of measures to promote diversity in the workforce.

These topics were addressed in decisions taken by the Management Board, in strategy meetings and committee meetings. Concrete measures were adopted and directed towards minimizing risks and exploiting opportunities.

DR GOV-3: Integration of sustainability-related performance in incentive schemes

The SURTECO Group has recognized the key role played by sustainability in promoting long-term value creation and responsible business practices, and the Group has implemented sustainability targets within the incentive systems used for the Management Board.

The compensation system for the Management Board provides for a share of 10 % of variable remuneration to be determined by the achievement of sustainability targets. These sustainability targets are established by the Supervisory Board in consultation with the Management Board for each business year.

The SURTECO Group publishes a Compensation Report every year in order to give stakeholders insights into the performance of and benefits to our Management Board, including the progress made in attaining sustainability targets. You can find these Compensation Reports under Financial Reports of the SURTECO Group on the Internet Portal of SURTECO (www.surteco.com, Investor Relations, Financial Reports).

DR GOV-4: Statement on due diligence

The SURTECO Group has established a comprehensive due diligence approach to ensure that all risks and opportunities relevant to sustainability are systematically identified, assessed and addressed across all business units, supply chains and stakeholders. A key factor here is setting up a robust due diligence process that encompasses the following key elements:

- Evaluation and identification of potential sustainability risks in all business operations.
- Use of Key Performance Indicators (KPIs) aligned with sustainability-related targets to measure progress and identify potential for improvement at an early stage.
- Close communication and collaboration with stakeholders – including suppliers, employees, investors and local communities – in order to ensure transparency and accountability.
- Continuous review and adaptation of the due diligence process in response to changing regulatory requirements, market trends and stakeholder expectations.

The Sustainability Team at the SURTECO Group is working on further developing this process in order to manage the company’s sustainability initiatives effectively and integrate them successfully within the strategy across the company.

The following table provides an overview of how the core elements of due diligence are presented in the sustainability statement:

Core elements of the duty of care	Sections in the sustainability declaration	Relevant stakeholders / responsible parties
Integration of due diligence into governance, strategy and business model	Section DR SBM-1 & DR GOV 1: Sustainability strategy & governance structure	Management Board, Supervisory Board, Sustainability Team
Involvement of affected stakeholders in all key due diligence steps	Section DR SBM-2: Stakeholder engagement & dialog mechanisms	Suppliers, customers, investors, NGOs, employee representatives
Identification and assessment of negative impacts	Section DR IRO-1 & DR SBM-3: Materiality analysis & risk identification	Environmental organizations, employees, local communities
Measures to counter negative effects	Section DR GOV-5: ESG management systems & action plans	Sustainability managers, compliance, internal audit, works councils
Tracking the effectiveness of efforts and communication	Section DR GOV-5: Monitoring, KPIs & Reporting	Internal audit, external auditors, rating agencies

- **Integration into corporate governance:** Due diligence is firmly anchored in the governance structure. The Management Board bears ultimate responsibility while the Sustainability Team as an operational committee develops concrete measures and coordinates their implementation.
- **Stakeholder integration:** Regular dialogues and reporting proactively involves internal and external stakeholders in the due diligence process. This approach promotes transparency and strengthens the trust and confidence in the decisions taken by the company relating to sustainability.
- **Measurement and continuous improvement:** Clearly defined KPIs provide assistance in measuring progress and identify specific areas where improvements are necessary. Continuous review and adaptation of the process ensures that the company can respond flexibly to new challenges and regulatory changes.

DR GOV-5: Risk management and internal controls over sustainability reporting

The SURTECO Group has established a structured system for identification, assessment and management of risks within sustainability reporting. This system is integrated within risk management through-out the company and comprises the following:

- A central Sustainability Management System that defines the guidelines and procedures for data collection, data analysis and data reporting.

- Internal controlling mechanisms that ensure the quality and accuracy of the sustainability data collected.
- Regular review and auditing by Internal Audit and external auditors in order to ensure compliance with regulatory requirements.

The SURTECO Group uses a risk-based assessment methodology in order to identify and prioritize potential risks in sustainability reporting:

- Identification of risks: Analysis of potential risks, e.g. data gaps, inconsistent reporting or inadequate data sources.
- Assessment of the risks: Each risk is assessed on the basis of its probability and impact on reporting.
- Prioritization of the risks: Risks with high priority are addressed with targeted measures in order to safeguard the quality and reliability of reporting.

The following risks were identified as material and are addressed through specific measures:

Risk	Effects	Reduction strategy
Data gaps or missing data	Incomplete or distorted reporting	Automated data collection systems, close cooperation with relevant specialist departments
Incorrect data entry or calculations	Inaccuracies in the sustainability indicators	Standardized control mechanisms, internal plausibility checks
Delayed or untimely data collection	Failure to comply with reporting obligations in a timely manner	Implementation of a clear schedule for data collection and validation
Insufficient transparency and traceability	Stakeholder confidence in reporting could be impaired	Regular audits and documentation of all process steps

Strategy

DR SBM-1: Strategy, business model and value chain

SURTECO GROUP SE (Societas Europaea) is a company listed on the stock exchange under European law and is based in Bittenwiesen, Germany. The company is the ultimate parent company of the Group and is registered in the Company Register of the Local Augsburg Court (Amtsgericht Augsburg) under HRB 23000. The purpose of the companies consolidated in the SURTECO Group is the development, production and sale of coated surface materials based on paper and plastic.

Business areas

The SURTECO Group produces a wide range of products for domestic use, for the trade sector and for the public arena. SURTECO products are used in virtually all areas of daily life. For example, they are applied on furniture, flooring and doors in homes, in caravans and on cruise ships. The products manufactured by the Group companies are primarily processed by the international flooring, wood-based and furniture industries. They are also used by cabinetmakers and artisan craft businesses. This involves coatings being used for

wood-based materials such as chipboard and fibreboard. The coating gives these boards their final surface with appropriate visual, haptic and functional attributes. The most important sales markets for the Group include Germany, the rest of Europe, and North and South America.

Edgebandings based on plastic and paper are the SURTECO Group's product with the highest sales. Plastic edgings are made from the plastics ABS, PMMA, PP and PVC in a wide range of different dimensions and strengths to meet specific customer requirements. Melamine edgings are manufactured on the basis of printed lightfast specialist papers.

Finish foils made of plastic or paper are used in a wide variety of applications. The paper-based foils are used to create furniture surfaces with different design and haptic feels. The SURTECO Group offers plastic foils for furniture surfaces, as well as for further processing into carpets and for industrial applications.

Decor papers are applied to provide materials with decorative elements in order to refine wood-based surfaces, for use in the furniture and floor industries and in interior design. The development of wood, stone and fantasy decors is carried out in cooperation with the Group's in-house design studios.

The SURTECO Group offers products and solutions for flooring wholesalers and for professional floor-layers. The product range covers skirtings, stair edges, transition rails and all the accessories required for laying floors.

Release papers from the SURTECO Group are widely used in the wood-based material industry. The product lends the surface its final visual look and creates an appealing haptic feel. Release papers are also used to give texture to other materials such as leatherette.

Technical extrusions made of all common plastics manufactured for the construction sector and many other industrial sectors complete the product portfolio.

Laminates have a multilayer structure and offer long-life and cost-effective surfaces for living environments and commercial spaces. Performance foils offer a variety of final applications as rigid, semi-rigid and flexible foils. Coated fabrics are vinyl-coated materials and they are used in cushioning for seats and coverings, for example in the automobile industry or in marine settings on ships.

Focuses of sustainable business

By adopting the Sustainable Development Goals (SDGs) of the UN, the community of nations has made a commitment to work together and contribute jointly to improving economic, environmental and social development by 2030. The SDG Agenda is intended to decisively drive forward global activities with 17 Global Goals and 169 targets. The individual goals are closely linked together and exert an influence on each other in a variety of different ways.

Achieving these goals is the shared responsibility of all societal players, including commercial enterprises. They provide the framework for what companies have to achieve in order to continue to be able to do business successfully in the future. Without neglecting the perspective of a holistic approach to the goals, the SURTECO Group analyses the priorities for developing its sustainability strategy in a continuous process. The SURTECO Group evaluated its business activities in the course of this procedure. On this basis, eight SDGs from the UN sustainability goals were identified that the SURTECO Group can exert a major influence on. Partnerships for achieving the goals (SGD 17) complement the strategy. The defined goals were included in the strategy of the SURTECO Group. The measures derived from this analysis are presented in the table below.

Target number	Sustainable Development Goal (SDG)	SURTECO Group Measure for implementation
3	Health and well-being	- Occupational health and safety - Compatibility of work and family
5	Gender equality	- Diversity - Women in management positions
6	Clean water	- Reduction of water consumption - Wastewater management
8	Decent work and economic growth	- Working conditions - Code of conduct for suppliers
9	Industry, innovation and infrastructure	- State-of-the-art technology - Product and process innovations
12	Sustainable consumption and production	- Minimizing the use of resources and energy - Process optimization
13	Climate protection measures	- Emission minimization - Waste management
17	Partnerships to achieve all goals	- Emission minimization - Waste management

Sustainability targets have been agreed for all products in the SURTECO Group. This involves using raw materials that are already bio-based or renewable through the application of materials based on wood fibre such as paper and wood-based materials. We aim to base our products on the following criteria:

- **Resource conservation**
Reduction of the use of fossil-based raw materials through the application of recycled or bio-based materials.
- **Energy efficiency**
Optimization of production processes to reduce energy consumption and to make use of renewable energy.
- **Waste management**
Minimization of production waste and promotion of recycling and reuse.
- **Circular economy**
Establishment of circular and recycling processes which promote recovery.
- **Transparent supply chains**
Safeguarding sustainable procurement of raw materials and other materials.
- **Product design**
Design of products that are easier to recycle and have fewer environmental impacts.

The sustainability targets listed above relate to all product groups of the SURTECO Group and there is no prioritization by geographical regions. During the reporting period, there were no significant changes in the product offering, or the markets and customer groups.

A material component for tracking and implementation of targets is the ISO certification to various standards of our locations.

The following table provides an overview of the certified locations.

Certified production locations						
Country	Site	Quality (ISO 9001)	Environment (ISO 14001)	Energy (ISO 50001)	Occupational Safety (ISO 45001)	Other certifi- cation
Germany	Buttenwiesen *	FSC, PEFC
	Bönen	.	.	.		Greenguard, FSC, PEFC, Blauer Engel
	Dunningen	.	.	.		Greenguard, FSC, PEFC Blauer Engel
	Gladbeck	.		.		Greenguard
	Grammetal	.	.	.		Greenguard, FSC, PEFC Blauer Engel
	Halle (Saale)					
	Heroldstatt	.		.		FSC, PEFC
	Hüllhorst	.	.	.		FSC, PEFC
	Laichingen	.	.	.		FSC, PEFC
	Sassenberg *	FSC, PEFC
	Willich					
USA	Agawam					
	Auburn					Vantage Vinyl
	Greensboro					
	Jeannette					Vantage Vinyl
	Monroe					Vantage Vinyl
	Myrtle Beach					
United King- dom	Ashbourne	.	.			
	Stourport-on- Severn	.	.			
Canada	Brampton					
Brazil	São José dos Pinhais	.				
Portugal	Mindelo	.	.			
Sweden	Gislaved	.	.			
Indonesia	Batam					Greenguard
Thailand	Rayong	.	.			
Australia	Sydney					Greenguard

*Principle of the procedure. Includes requirements from DIN ISO 4500

Wherever possible the SURTECO Group joins forces with its customers to carry out development projects in order to find solutions for circular processes in the packaging sector and for recycling processes concerning plastic products.

All the products of the SURTECO Group can be subsumed under the category “Building products and furnishings”.

Business (product) € million	2024	2025
Edgebands	260.7	239.5
Finish foils	137.2	128.3
Decorative printing	88.2	93.5
Impregnates / Release papers	48.6	31.5
Skirtings and related products	73.8	76.9
Technical extrusions	47.0	46.8
Laminates	98.3	95.1
Performance Films	31.6	34.3
Coated Fabrics	39.6	41.9
Other	31.6	33.4
	856.6	821.2

Global presence

Being close to our customers is important for the SURTECO Group. Proximity guarantees short delivery pathways that save resources and permit individual bespoke responses to differing regional preferences and trends. The SURTECO Group operates in virtually all the countries of the world and maintains 26 production locations in Germany, the United Kingdom, Sweden, Portugal, Canada, USA, Brazil, Indonesia, Thailand and Australia. At the same time, the company’s global presence and comprehensive product range make it less vulnerable to the volatility of sales fluctuations in individual countries and sectors.

Geographical breakdown of SURTECO Group	Sales in € million		Employees at 31/12	
	2024	2025	2024	2025
Germany	160.6	156.3	1,490	1,499
Europe (without Germany)	315.5	303.9	641	646
America	297.1	280.3	1,043	1,001
Asia / Australia	75.1	71.6	558	549
Other	8.3	9.1	0	0
	856.6	821.2	3,732	3,695

Value chain

Sustainable business practices encompass not only the organization itself but also upstream and downstream sectors throughout the entire value chain.

The SURTECO Group procures raw materials, packaging materials, production goods, services and other inputs such as energy worldwide. Generally speaking, the SURTECO Group purchases directly from several manufacturers and is not dependent on an individual supplier. The cost of materials ratio was 49 % in 2025 and this indicates that the procurement of raw materials constitutes the biggest expense item for the SURTECO Group. Around 75 % of the total cost of materials is attributable to the three most important raw materials paper, plastics and chemical additives. Consequently, plastics manufacturers, paper producers and the chemicals industry are the most important groups of suppliers.

In order to uphold its social and environmental responsibility in the framework of a holistic approach the SURTECO Group has defined its values in a Code of Conduct for suppliers – Sustainable Procurement ("Code of Conduct") with 17 principles based on ethical business conduct, social standards and environmental standards. The Code is based on international conventions such as the United Nations Human Rights Declaration, the guidelines on children's rights and entrepreneurship, business conduct and human rights, labour standards and the United Nations Global Compact.

End customers are dominated by the wood-based materials industry, the wholesale trade, the home-improvement market and the furniture industry. End consumers only purchase skirtings through the home-improvement sector as a finished product manufactured by the SURTECO Group. Surface materials are incorporated into the production process at customers of the SURTECO Group in order to make other products like furniture, doors and laminate flooring. Most end products can be disposed of through house-hold waste collection or recycling centres. Some furniture parts can be recycled and returned to the wood-based materials industry.

The need for living and office space is constantly increasing as the global population rises, together with the consequent expansion of purchasing power. This is leading to a spiralling demand for furniture, flooring and interior installations. It is particularly relevant for the demographic and economic development taking place in the emerging economies. In addition, the global trend towards urbanization and individualization is generating an accelerated demand for attractive interior architecture and fittings.

The company and its products need to become more sustainable over the entire value chain in order to meet this challenge without jeopardizing the company's principles.



Strategy and business model

The strategy of the group of companies with its seven pillars of Product Leadership, Operational Excellence, Commercial Excellence, Digitalization, Focused Internationalization, Sustainability and a Corporate Culture under the slogan of “Company I like to work for” is single-mindedly focused on the overarching goal: “We make rooms worth living in”.

The business model of the SURTECO Group is based on the claim that we manufacture outstanding surfaces, edgings and extrusions (profiles). However, excellent products in themselves are not sufficient to guarantee sustainable success over the long term. This offering is supplemented by bespoke solutions that are tailor-made to suit the needs of our customers and this is augmented by comprehensive service. Our strategy rises to this challenge by encompassing all stages of the value chain, with a particular focus on providing the best possible service for all our customers.

DR SBM-2: Interests and views of stakeholders

The SURTECO Group absolutely needs to understand the impacts that stakeholders may exercise on our business activities. But also understand the interests and views of stakeholders and embedded it into the business strategy.

The SURTECO Group communicates continuously and promptly with the most important stakeholders in a form that is relevant to the individual target group. The most important stakeholders are listed below. They were identified in the SURTECO Group's activities and business relationships as well as its engagement initiatives in order to identify their interests and views.

Key stakeholders of the SURTECO Group				
Stakeholder	Communication	Interests and views	Implementation in the SURTECO strategy - Pursuit of the UN goal	Consideration of stakeholder interests
Investors	Annual General Meeting Capital market conferences Individual meetings	Sustainable corporate value Profitability Profitable and competitive business models	SDG 8 Decent work and economic growth	Reporting on ESG key figures Integration into sustainability decisions
Supervisory Board	Supervisory Board meeting	Sustainability strategy Sustainable corporate value Leadership role in sustainable developments	SDG 8 Decent work and economic growth SDG 13 Climate action	Integration of sustainability goals into the corporate strategy Regular sustainability reports ESG-supported remuneration models for the Management Board
Management Board	Executive Management Meeting Strategy meeting Board meeting	Sustainability strategy Sustainable management Environmental and health protection Corporate governance	SDG 3 Good health and well-being SDG 8 Decent work and economic growth SDG 13 Climate action	Anchoring sustainability in corporate management Setting and monitoring climate targets Promotion of a sustainable corporate culture
Employees	Works meetings Appraisal interviews Employee surveys Intranet	Secure employment Equal opportunities Equal pay Further development Work / life balance	SDG 3 Good health and well-being SDG 8 Decent work and economic growth	Training on sustainable working practices Involvement in decision-making processes, Promotion of diversity
Suppliers	Purchasing discussions Supplier evaluation Trade fairs	Sustainable supply chain Health and safety Working conditions and rights Climate change Circular economy	SDG 9 Industry, innovation and infrastructure SDG 13 Climate action	Supplier audits Promoting joint resource conservation and circular economy projects
Customers	Sales meetings Customer events Customer satisfaction analysis Conferences	Sustainable products and production Sustainable supply chain Health and safety Working conditions and rights Climate change Circular economy	SDG 12 Sustainable consumption and production. SDG 13 Climate action	Transparency about sustainable products Recycling and take-back concepts Sustainable packaging solutions
Inhabitants / Communities	Press Open day Informal contacts	Sustainable production sites in harmony with quality of life	SDG 6 Clean water and sanitation SDG 13 Climate action	Participation in local environmental and social projects Reduction of local emissions
Authorities and associations	Press Communication via specialist departments	Corporate Governance Environmental protection	SDG 13 Climate action SDG 17 Partnerships to achieve the goals	Compliance with legal requirements Involvement in sustainability initiatives

The administrative, management and supervisory bodies have a special role within the scope of stakeholder reporting. This relates to the Management Board, the Supervisory Board and the operational management team. These bodies are kept regularly informed by the Sustainability Officer during the course of Management Board and Supervisory Board Meetings, or in the case of operational management as part of the Management Review Meetings. The latter meetings in particular also gather information within the Business Units about stakeholder opinions along the supply chain.

More robust integration of stakeholders increases acceptance and legitimacy because a range of interests is taken into account. This also promotes innovations because suppliers, customers and NGOs can contribute sustainable solutions. Risks such as environmental or social problems can be identified and avoided at an early stage. Active stakeholder involvement means that sustainability will be more credible and make a contribution to wealth creation over the long term. Investors prefer companies with clearly defined ESG strategies and this facilitates financing. Over the long term, close stakeholder involvement therefore enhances economic stability and reduces regulatory risks.

The SURTECO Group has therefore adapted its business model to have a greater focus on sustainable material innovations, recyclability and less resource-intensive production processes. This approach takes account of stakeholder interests and regulatory requirements. The business model is being adapted in accordance with the existing structures and framework conditions of stakeholder relationships.

The methodology applied by the SURTECO Group to identify and assess material impacts, risks and opportunities is described in DR IRO-1 under the section Impacts, Risk and Opportunity Management of this reported standard.

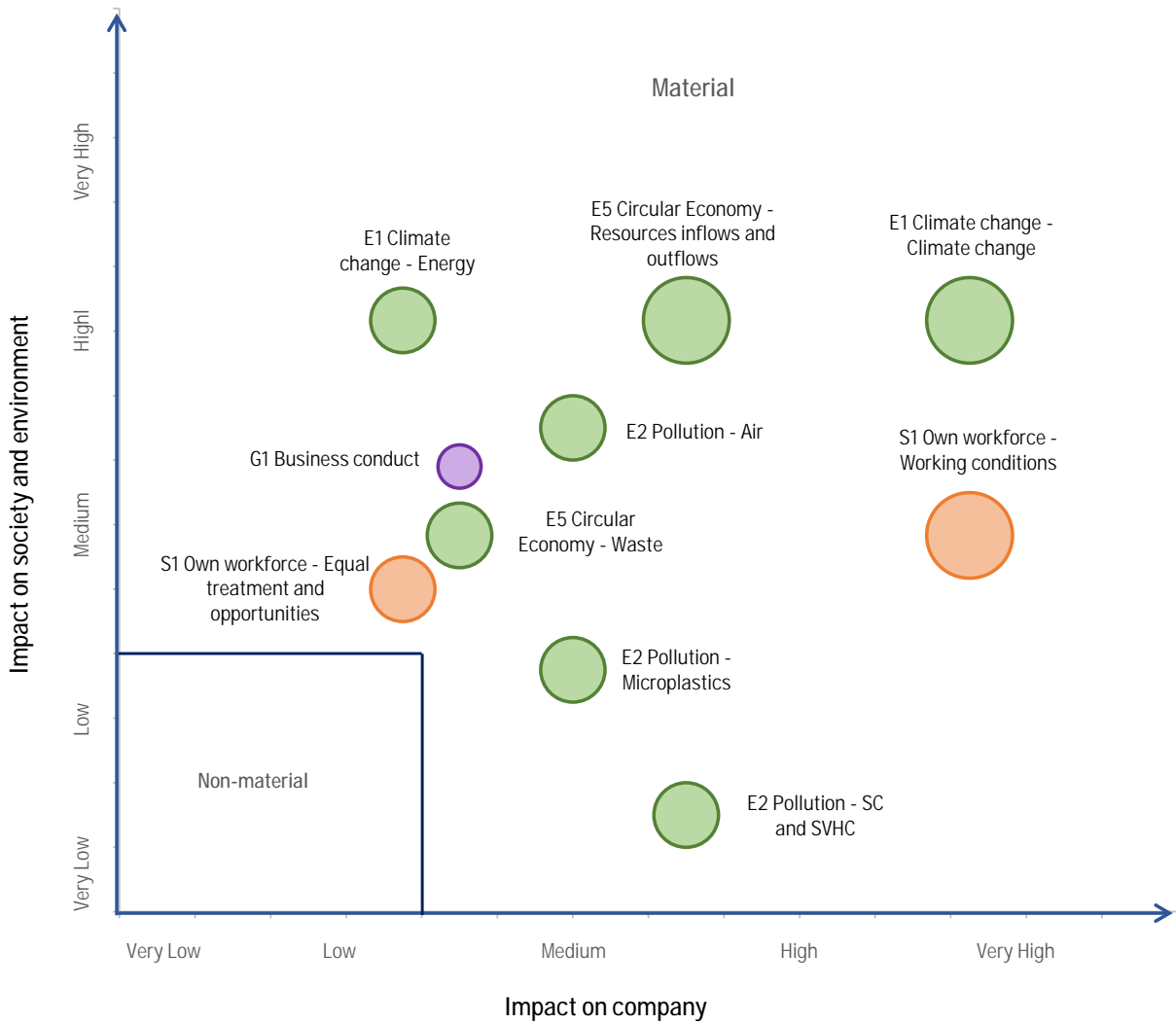
DR SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
Sustainability in the SURTECO Group is a pillar of the corporate strategy that is networked with all areas of activity. This approach is adopted because we are aware that while it is our responsibility to pursue the economic interests of the shareholders, we also have a responsibility to preserve the planet's resources and contribute to the well-being of society.

The company culture and the employees are the foundation underpinning the SURTECO strategy. The SURTECO Group is committed to the principles for sustainable development and improvement of living standards and intends to be a sustainable company and a role model for ESG practices.

The SURTECO Group identified its material topics on the basis of the materiality analysis methodology described in DR IRO-1. This can be found under the section Impact, Risk and Opportunity Management in this reporting standard.

The SURTECO Group consolidates its impacts, risks and opportunities taking into account the relevant sustainability aspects in order to provide a better overview. The topics and results of the materiality analysis are provided in the following matrix.

The material impacts, risks and opportunities are the result of the interaction between the environment and society with the activities and business relationships of the SURTECO Group.



ESRS E1 – Climate change

The dependence on energy resources, the necessity to increase efficiency and the proportion of renewable energy make energy a relevant topic for the SURTECO Group. This is not simply on account of the impacts that result from the use of non-renewable energy sources. It also relates to the financial impacts that the energy transition can exert on the company. Additional material impacts result from the release of greenhouse gases (GHG) and their potential impact on climate change. Changes in the regulations, restrictions on the use of fossil-based energies, charges for emissions of greenhouse gases and the costs of decarbonization can also all impact negatively on the business. Impacts, risks and opportunities arising from energy consumption and the release of greenhouse gases have a higher incidence in the supply chain, material transport and the SURTECO Group’s own operations.

ESRS E2 – Pollution

The materiality of pollution depends on the type of materials used by the SURTECO Group. Air pollution is a material topic for the SURTECO Group because it uses materials containing solvents and these can potentially cause harm when released into the air. In spite of the existing treatment systems and mitigation measures, the release of solvent emissions is relevant for the SURTECO Group. However, significant risks may also arise from changes in legal requirements when using materials of this nature. Similarly, changes in emission limits may lead to restrictions on the selection of materials, processes or treatment technologies.

The manufacture of plastics and the use of raw materials which are classified as microplastics are also material for the SURTECO Group. This is not only the case on account of the potential impacts owing to contamination but also due to the mandatory requirements for their application.

ESRS E5 – Resource use and circular economy

The type of business activity of the SURTECO Group, its dependence and the impacts of its use make resource use and the circular economy a key issue in their in-house business activities and also in up-stream activities. The volume of waste and the proportion of disposal processes are also relevant topics for the efficient use of resources and the circularity of materials.

ESRS S1 – Own Workforce

Our slogan "A company I like to work for" is one of the pillars of SURTECO's strategy, and occupational health and safety, social security and the right work-life balance are absolutely essential for this. Loyalty, stability and commitment are some of the key effects of this topic. But the other side of the coin is the way the workforce, their absenteeism and lack of commitment can impact negatively on the company.

ESRS G1 – Business Conduct

Violations of human rights principles have been identified as a material topic for the SURTECO Group not because of the probability of occurrence, since the probability of their occurring is very low, but because of the magnitude of their impact. The corporate culture at the SURTECO Group is based on people and their rights. Protection of these rights is supremely important over the entire value chain.

Every single material matter is disclosed in this sustainability statement in accordance with the relevant thematic standard.

Impacts, risks and opportunities	Measures	Positive Effects	Negative Effects	Financial Effects	Consideration of the value chain
ESRS E1 Climate Change	Reduction of energy consumption, use of renewable energies, investment in energy efficiency technologies	Reduction of greenhouse gas emissions, reduction of energy costs, fulfillment of regulatory requirements	Investment costs for energy efficiency measures	Long-term cost savings through energy efficiency and reduced CO2 costs	Energy efficiency and decarbonization in the supply chain, material transport and own operations
ESRS E2 Environmental pollution	Use of alternative, less environmentally harmful materials, improvement of wastewater treatment processes	Reduction of emissions, protection of the environment, material efficiency	Customization costs for new materials, production processes	Cost savings through reduction of environmental penalties	Use and emissions of solvents in the supply chain, plastic production and micro-plastic risks
ESRS E5 Resource utilization and circular economy	Promotion of circular economy practices, increased recycling, use of secondary materials	Greater resource efficiency, material availability, lower waste costs	Initial investment in recycling initiatives	Reduction in material and waste management costs	Waste generation, material transportation and raw material consumption, circular economy initiatives in the supply chain
ESRS S1 Own workforce	Health and safety programs, training initiatives, promotion of work-life balance, diversity and inclusion	Improved employee retention, higher productivity	Costs for training programs and company health initiatives	Lower sickness rates, reduced fluctuation rates	Workplace culture, health protection and commitment in the value chain
ESRS G1 Business conduct	Implementation of guidelines for compliance with human rights, transparency initiatives	Strengthening reputation, reducing risks in the area of human rights	Expenses for compliance and monitoring	Reduction of reputational damage and compliance fines	Human rights and ethics throughout the value chain, supplier management and compliance monitoring

Impact, risk and opportunity management

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

The SURTECO Group has implemented a structured procedure in order to identify and assess systematically material sustainability topics, risks and opportunities. The starting point for this procedure is the comprehensive determination of potentially relevant topics arising from the areas of Environment, Social and Governance (ESG). The company is guided by the requirements of the European Sustainability Reporting Standards (ESRS) and the regulatory requirements, industry-specific developments and global sustainability goals such as the Sustainable Development Goals (SDGs) of the United Nations.

A key component of the process is identification of the relevant stakeholder groups. This includes customers, employees, suppliers, investors, local communities and organizations of civil society. The perspectives and expectations of these stakeholders are integrated systematically in the process by means of surveys, workshops and dialogue formats. In order to ensure that all relevant topics are taken into account.

The company uses internal and external information sources to identify the topics and the underlying data. Internal sources encompass e.g. indicators from environmental management, social indicators and risk reports. External sources comprise regulatory requirements, scientific studies, market analyses and sector reports. This information is brought together and serves as the foundation for additional analysis.

The assessment of the identified topics is carried out in the context of a materiality analysis, which is based on the concept of double materiality. Two perspectives are taken into account. On the one hand, the impact dimension, which describes the impacts that the company has on the environment and society, such as the emission of greenhouse gases, the use of resources or social concerns such as diversity and inclusion. On the other hand, the financial dimension, which examines the impacts of sustainability topics on the company’s business activities and financial situation. Examples of the latter dimension include climate risks, regulatory changes or access to financing opportunities.

The SURTECO Group has established a structured decision-making process to ensure that significant impacts, risks and opportunities are systematically identified, assessed and monitored. This process is carried out by an interdisciplinary team, which is made up of representatives from the executive management, the sustainability management team, the risk management team and relevant specialist departments. The internal controlling procedures include regular review and approval by the Management Board along with implementation of a double-checking (four-eyes) principle relating to materially important key decisions.

The assessment process for impacts, risks and opportunities is integrated within the existing Risk Management System and permits a complementary analysis of financial and operational risks. The Risk Management System (RMS) is disclosed in the management report and does not place any special focus on risks related to sustainability.

The results of the impacts, risk and opportunity assessments flow directly into strategic planning and decision-making at the company and departmental levels. For example, the findings are used to guide investment decisions, product development strategies and measures for compliance with statutory regulations. In addition, the results are communicated regularly at board meetings and workplace meetings.

DR IRO-2: Disclosure Requirements in ESRS covered by the undertaking’s sustainability statement

The DRs in the ESRS are listed in the following table as a result of the material analysis. These were identified by the SURTECO Group as material and they were included in this Sustainability Statement.

DRs covered in the sustainability statement			
Standard	Chapter	Disclosure Requirement	Paragraph
ESRS 2	Governance	DR GOV-1: The role of the administrative, management and supervisory bodies	1
		DR GOV-2: Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	2
		DR GOV-3: Integration of sustainability-related performance in incentive schemes	3
		DR GOV-4: Statement on due diligence	4
		DR GOV-5: Risk management and internal controls over sustainability reporting	5
	Strategy	DR SBM-1: Strategy, business model and value chain	1
		DR SBM-2: Interests and views of stakeholders	2

DRs covered in the sustainability statement

Standard	Chapter	Disclosure Requirement	Paragraph
		DR SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	3
	Impact, risk and opportunity management	DR IRO-1: Description of the process to identify and assess material impacts, risks and opportunities	1
		DR IRO-2: Disclosure Requirements in ESRS covered by the undertaking's sustainability statement	2
		MDR-P: Policies adopted to manage material sustainability matters	3
		MDR-A: Actions and resources in relation to material sustainability matters	4
	Metrics and targets	MDR-M: Metrics in relation to material sustainability matters	1
		MDR-T: Tracking effectiveness of policies and actions through targets	2
ESRS E1	Governance	DR related to ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes	1
	Strategy	DR E1-1: Transition plan for climate change mitigation	1
		DR related to ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	2
	Impact, risk and opportunity management	DR related to ESRS 2 IRO-1: Description of the process to identify and assess material impacts, risks and opportunities	1
		DR E1-2: Policies related to climate change mitigation and adaptation	2
		DR E1-3: Actions and resources in relation to climate change policies	3
	Metrics and targets	DR E1-4: Targets related to climate change mitigation and adaptation	1
		DR E1-5: Energy consumption and mix	2
		DR E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions	3
		DR E1-7: GHG removals and GHG mitigation projects financed through carbon credits	4
		DR E1-8: Internal carbon pricing	5
		DR E1-9: Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	6
	ESRS E2	Impact, risk and opportunity management	DR related to ESRS 2 IRO-1: Description of the process to identify and assess material impacts, risks and opportunities
DR E2-1: Policies related to pollution			2
DR E2-2: Actions and resources related to pollution			3
Metrics and targets		DR E2-3: Targets related to pollution	1
		DR E2-4: Pollution of air, water and soil	2
	DR E2-5: Substances of concern and substances of very high concern	3	

DRs covered in the sustainability statement

Standard	Chapter	Disclosure Requirement	Paragraph
		DR E2-6: Anticipated financial effects from material pollution-related risks and opportunities	4
ESRS E3	Water and marine resources standard not covered in the sustainability statement - under the materiality assessment no topics were identified as material. Most of the water is used for cooling or cleaning purposes and discharged back into the public drainage system or even rivers after appropriate treatment and processing. Only a very small proportion of the volume of water withdrawn is associated with the manufacture of inks and varnishes. The assessment took into account the amount of water used by each SURTECO site, the purpose of its use and total annually consumption. The level of water stress at each location was also analysed.		
ESRS E4	Biodiversity and ecosystems standard not covered in the sustainability statement - under the materiality assessment no topics were identified as material. The majority of SURTECO's production sites are in industrial areas or other business parks, although SURTECO also has some operational premises close to protected nature conservation areas. No relevant impacts were identified on biodiversity or ecosystem. SURTECO defines strict rules for plants located near flowing bodies of water so that production does not lead to any recordable impacts on the surrounding fauna and flora. The assessment also took in consideration the impact in value chain, especially due to the use of paper raw materials. All paper raw material used by SURTECO are certified accordingly with FSC or PEFC, meaning that materials come from sustainable sources.		
ESRS E5	Impact, risk and opportunity management	DR related to ESRS 2 IRO-1: Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	1
		DR E5-1: Policies related to resource use and circular economy	2
		DR E5-2: Actions and resources related to resource use and circular economy	3
	Metrics and targets	DR E5-3: Targets related to resource use and circular economy	1
		DR E5-4: Resource inflows	2
		DR E5-5: Resource outflows	3
DR E5-6: Anticipated financial effects from material resource use and circular economy-related risks and opportunities		4	
ESRS S1	Strategy	DR related to ESRS 2 SBM-2: Interests and views of stakeholders	1
		DR related to ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	2
	Impact, risk and opportunity management	DR S1-1: Policies related to own workforce	1
		DR S1-2: Processes for engaging with own workforce and workers' representatives about impacts	2
		DR S1-3: Processes to remediate negative impacts and channels for own workforce to raise concerns	3
		DR 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	4
	Metrics and targets	DR S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	1
		DR S1-6: Characteristics of the undertaking's employees	2
		DR S1-7: Characteristics of non-employees in the undertaking's own workforce	3

DRs covered in the sustainability statement

Standard	Chapter	Disclosure Requirement	Paragraph
		DR S1-8: Collective bargaining coverage and social dialogue	4
		DR S1-9: Diversity metrics	5
		DR S1-10: Adequate wages	6
		DR S1-11: Social protection	7
		DR S1-12: Persons with disabilities	8
		DR S1-13: Training and skills development metrics	9
		DR S1-14: Health and safety metrics	10
		DR S1-15: Work-life balance metrics	11
		DR S1-16: Remuneration metrics (pay gap and total remuneration)	12
		DR S1-17: Incidents, complains and severe human rights impacts	13
ESRS S2	Workers in the value chain standard not covered in the sustainability statement - under the materiality assessment no topics were identified as material. The assessment considered SURTECO main suppliers' location and areas at risk. Is in motion a worldwide screening analysis within the scope of the Supply Chain Act that will improve completeness and accuracy of the assessment.		
ESRS S3	Affected communities standard not covered in the sustainability statement - under the materiality assessment no topics were identified as material. The assessment took in consideration the location of SURTECO plants and its proximity to communities, with the majority being in industrial areas. For the value chain, in particular suppliers of paper raw materials, SURTECO use materials certified accordingly with FSC and PEFC.		
ESRS S4	Consumers and end-user's standard not covered in the sustainability statement - under the materiality assessment no topics were identified as material. Given the characteristics of SURTECO products, classified as articles, and its business-to-business model, no relevant risks are expected to occur from its use.		
ESRS G1	Governance	DR related to ESRS 2 GOV-1: The role of the administrative, supervisory and management bodies	1
	Impact, risk and opportunity management	DR related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	1
		DR G1-1: Corporate culture and business conduct policies and corporate culture	2
		DR G1-2: Management of relationships with suppliers The Disclosure requirement Management of relationships with suppliers is not covered in the sustainability statement. Under the materiality assessment these topics were identified as not material. Because The group-wide Corporate Centre "Group Procurement" defines the framework conditions for procurement and coordinates the relationships with suppliers. The avoidance of payment delays, particularly in the case of small and medium-sized companies, is ensured through defined processes for incoming invoices within the relevant Enterprise Resource Planning systems. The Group has its own Supplier Code containing detailed guidelines for ethical, social and environmental standards that is covered under the disclosure requirement G1-1.	
		DR G1-3: Prevention and detection of corruption and bribery	4
	Metrics and targets	DR G1-4: Confirmed incidents of corruption or bribery	1

DRs covered in the sustainability statement

Standard	Chapter	Disclosure Requirement	Paragraph
		DR G1-5: Political influence and lobbying activities The Disclosure requirement Political influence and lobbying activities is not covered in the sustainability statement. Under the materiality assessment these topics were identified as not material because no company of the SURTECO Group has been entered in the EU Transparency Register or in the local Transparency Registers of the relevant governments and our code of conduct prohibit any financial and in-kind political contribution	
		DR G1-6: Payment practices The Disclosure requirement Payment practices is not covered in the sustainability statement. Under the materiality assessment these topics were identified as not material, as referred in G1-2	

MDR-P: Policies adopted to manage material sustainability matters

The SURTECO Group has implemented a Group Sustainability and Risk Management Policy. The results of our risk assessments are being included in our group-wide risk controlling, analysed for urgency and relevance, and the appropriate measures will be implemented where possible. The inspection of operational facilities will be carried out at regular intervals in accordance with local circumstances and take into account changes that have occurred at local level.

Environment information

DISCLOSURE IN ACCORDANCE WITH ARTICLE 8 (2) OF DIRECTIVE (EU) 2020/852

As part of the European Union action plan "Financing Sustainable Growth", the Taxonomy Regulation came into force in 2020. It forms the foundation for the assessment criteria defining business activities as environmentally sustainable and lays down the regulations for reporting by the companies subject to reporting requirements. SURTECO has been subject to the reporting requirements under the Taxonomy Directive since 2021.

In 2025, the EU Commission issued a delegated act to streamline the reporting requirements of the EU taxonomy. This act took effect upon publication in the Official Journal on January 8, 2026, and can be applied to reporting for the 2025 financial year. This act gives companies the option omit assessing whether some of their economic activities are taxonomy-eligible or taxonomy-aligned where the cumulative capital expenditure related to those economic activities is below 10% of the denominator of the CapEx KPI. Furthermore the company may omit assessing whether operational expenditure related to all their economic activities is taxonomy-eligible or taxonomy-aligned, where the operational expenditure is not material for the business model of the Company, provided that the total value of the OpEx KPI denominator is disclosed and an explanation, why the operational expenditure is not material for the business model is disclosed. SURTECO takes advantage of these opportunities with the following explanation.

SURTECO's business model is based on the manufacture of materials for the wood-based materials, furniture, and caravan industries, as well as for interior design. None of these products are included in the activities related to the environmental objectives of the EU taxonomy. As a result, no taxonomy-eligible revenues have been identified in recent years, only taxonomy-eligible investment and operating expenses on a small scale. This mainly concerned the company's vehicle fleet, as well as investments in and operation of charging stations for electric cars, PV systems, and various energy-efficient devices. The SURTECO Group's business model also works without these activities, as business trips can be made using public transport, for example, and the power supply is also secured without the company's own PV systems. These activities therefore fall below the materiality threshold of 10% of total investment expenditure. In this respect, further determination of taxonomy compliance for the CapEx KPI can be waived for materiality reasons in accordance with the provisions of the EU taxonomy. The company's taxonomy-eligible but financially immaterial CapEx activities amount to € 1.5 million in the 2025 financial year, or 3.8 % of total CapEx. In 2024 taxonomy-eligible CapEx activities of € 2.2 million were identified.

As a manufacturing company, operating expenses are a necessity for SURTECO but are not essential to its business model. Operating expenses at SURTECO never directly generate revenue. The fact that there is no taxonomy-eligible revenue within the group also correlates with the immateriality of operating expenses. Research and development expenses can also be considered irrelevant to the implementation of the business model simply because of their very low amount. The company tries to reduce operating expenses to a minimum and could theoretically maintain its business model without these expenses altogether. In addition, taxonomy-eligible operating expenses fell below the newly introduced materiality threshold of 10 % in the last fiscal year. Since no structural changes in potentially taxonomy-eligible business expenses were

identified in the reporting period and, on the contrary, the company's leasing strategy for its vehicle fleet means that vehicle costs cannot be considered taxonomy-eligible (which was assumed in previous years), it can be assumed that the 10 % threshold will also be below the threshold in fiscal year 2025. In this respect, the company refrains from determining the taxonomy eligibility and taxonomy compliance of its operating expenses in accordance with the provisions of the EU taxonomy. Total operating expenses (OpEx KPI denominator) amounted to € 30.7 million in fiscal year 2025 after € 29,1 million in the previous fiscal year.

The following KPIs result for the business year:

Financial year 2025		Breakdown by environmental objectives of Taxonomy aligned activities																
KPI	Total	Proportion of Taxonomy eligible activities		Taxonomy aligned activities		Proportion of Taxonomy aligned activities		Climate Change Mitigation	Climate Change Adoption	Water	Circular Economy	Pollution	Biodiversity	Proportion of enabling activities	Proportion of transitional activities	Not assessed activities considered non-material	Taxonomy aligned activities in previous financial year 2024	Proportion of Taxonomy aligned activities in previous financial year 2024
		€ mill.	%	€ mill.	%	%	%											
Turnover	821.2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CapEx	38.7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3.8	0.6	0.2
OpEx	30.7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	0.0	0.0

ESRS E1 CLIMATE CHANGE

Governance

DR related to ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes

The mitigation of climate change constitutes a challenge for all companies. The goal of reducing CO₂ emissions is integrated in the incentive systems of the Management Board of the SURTECO Group. Additional information on the SURTECO Group Incentive Schemes and their payment is included under DR GOV-3, which can be found in this statement in the section Governance of ESRS 2 General Disclosures Standard.

Strategy

DR E1-1: Transition plan for climate change mitigation

The SURTECO Group has set itself the goal of keeping our planet “worth living on”. To this end, we are protecting our environment, using natural resources sparingly and avoiding or reducing the burden on people and nature. We have raised our goal of significantly reducing CO₂ from 30 % to 50 % by 2030 [base year 2019: 95,915 tons of CO₂ emissions]. Starting from the business year 2021, we have been sourcing green electricity at all locations in Germany and zero-emission electricity at some locations abroad. Our goal is to achieve the objective of becoming a climate-neutral company as early as the year 2045.

The short-term steps involve the conversion of all the production locations to the sourcing of electricity from renewable energy and the use of climate-friendly coolants. A group-wide, concerted transition plan is being drawn up and this plan is expected to be available by the business year 2027. The review of the transition plan is planned to be carried out by SBTi.

DR related to ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

The resilience analysis of the SURTECO Group carried out during the course of the business year assesses the adaptability of the business model and the strategy to meet the challenges of climate change with a timeframe of 5-10 years. In the context of the resilience analysis, the upstream value chain (upstream), including the procurement of raw materials and supplier dependencies, and the Group’s own business activities were assessed. The analysis of the downstream value chain (downstream) in the scope of the double materiality analysis revealed impacts and opportunities which, however, are classified as insignificant. Future analyses could take greater account of this area provided that relevant information is available.

The resilience analysis is a component of strategic planning and sustainability strategy, and it is embedded in the Strategy Review Process. Climate scenarios drawn up by the Intergovernmental Panel on Climate Change (IPCC) and the International Energy Agency (IEA) form the basis for analysis, with particular focus on a 1.5 degree warming scenario. These agencies use top-down approaches, which assess the global impacts of climate risks on the market for surface materials, and bottom-up approaches, which investigate the specific risks and opportunities along the value chain. Customer and market data are also analysed in order to take account of the needs of customers and regulatory requirements in relevant markets. Internal workshops with the executive management, and experts on sustainability, procurement and production supplement the analysis.

The results of the scenario analyses demonstrate that the SURTECO GROUP has opportunities in the 1.5 degree scenario through the early integration of sustainable materials and climate-friendly production methods. Products with a reduced carbon footprint can be positioned within the marketplace as a unique selling proposition.

In the course of the analysis, physical risks were identified such as

- shortage of raw materials and energy
- interruptions to the supply chain
- climate risks as a result of extreme weather events (storms, flooding, heat waves and cold snaps).

The following risk was identified as a transition risk:

- costs for the transition to climate-friendly technologies.

Fundamentally, price increases for raw materials and energy are a material risk because uncertainties related to climate change in their production and logistics can make procurement more expensive. At the same time, the shortage of raw materials can lead to restrictions in material availability and price hikes.

In addition, climate risks pose a direct threat for our production facilities, warehouses and transport pathways. Damage to infrastructure can trigger repair and insurance costs and/or make investments in resilient structures necessary. Furthermore, extreme weather conditions can exert an adverse effect on the working conditions for our employees and increase the chance of health risks.

Another risk is posed by the potential costs for the transition to climate-friendly technology. The conversion to more sustainable processes, materials and production methods requires investments. Furthermore, stricter regulations such as increasing CO₂ pricing or stricter environmental regulations, can entail additional financial burdens.

There is an opportunity in the expansion of the obligations and emission reporting as a result of new laws and directives. Potentially, this can lead to sharpening the sustainability strategy and a proactive response to future regulatory requirements, which can be seen as a strategic competitive advantage. The additional reporting obligations can promote the transparency and credibility of the SURTECO Group by demonstrating to investors, customers and other stakeholders that sustainability is firmly integrated into the corporate strategy.

Responses to the challenges of climate change can be classified in three time horizons:

Short-term adjustments (0–1 years)

- Production optimization and energy efficiency
- Use of materials and raw-material security through the use of recyclates and bio-based materials

Medium-term adjustments (1–5 years)

- Portfolio adjustment by means of development of new products with improved environmental footprint
- Supply-chain resilience by means of diversification of the supplier structure
- Training of employees

Long-term adjustment (> 5 years)

- Technological modernization by means of conversion to more environmentally friendly production procedures
- Repurposing and modernization: Gradual conversion or shutdown of specific production lines may be possible if this becomes necessary due to regulatory or climate developments.
- Decarbonization: Long-term investments in alternative materials and procedures for further reduction of the carbon footprint.

The SURTECO Group therefore regards its business model as based on a sound foundation, since excessive dependence is avoided especially as a result of internationally positioned production sites, the avoidance of single sourcing and long supply routes, direct access to the capital markets and a broadly based product portfolio.

Impact, risk and opportunity management

DR related to ESRS 2 IRO-1: Description of the process to identify and assess material climate-related impacts, risks and opportunities

The SURTECO Group identified its material IRO by applying the methodology for materiality analysis described in DR IRO-1, which can be found in the section Impacts, risk and opportunity management of the ESRS 2 General Disclosures standard contained in this statement.

As part of the implementation of ESRS 2 IRO-1, a detailed assessment of the locations of the SURTECO Group was conducted in relation to extreme climate events. The focus was exclusively on river flooding and coastal flooding, while other climate extremes were not taken into account during the reporting year. Furthermore, the supply chain was not considered in this analysis. This assessment was based on the AQUEDUCT Water Risk Atlas published by the World Resources Institute (WRI). This provides an evidence-based methodology for recording water-related risks. RCP8.3 was used as a climate-scenario model. The assessment will gradually be expanded to the supply chain and to other climate hazards by 2030.

CO₂ pricing is not included in the financial statements and no depreciation or impairments for fixed assets or buildings were undertaken. However, financial planning provides for investments in low-emission technologies or energy supply.

DR E1-2: Policies related to climate change mitigation and adaptation

The SURTECO Group is pursuing a strategic direction in order to manage climate-related impacts, risks and opportunities. The concepts are based on several **strategic pillars**, which are derived from the sustainability goals of the United Nations (SDGs). At the same time, they support the goals of the Paris Agreement and Germany's climate-neutrality strategy up to 2045.

Climate protection

- Innovations for improving the capability for product circularity (SDG 9).
- Reduction of the specific energy use in production (SDG 12, 13).
- Use of renewable or recycled raw materials to reduce the carbon footprint and to promote the circular economy (SDG 12).
- Reduction of emissions beyond CO₂, particularly reduction of emissions of volatile organic compounds (VOC) (SDG 13).

Adaptation to climate change

- Assessment of the company locations in relation to flooding caused by rivers and coastal flooding.

Energy efficiency

- Reduction of the use of materials in the manufacture of products in order to save resources and energy (SDG 12).
- Certification of our energy management systems in accordance with ISO 50001.
- Measures for continuous optimization of energy-intensive processes.

Use of renewable energy

- Gradual increase in the use of renewable energy.
- Investigation into materials along the upstream and downstream value chain with lower Product Carbon Footprint (PCF).

Other

- Avoidance of transport pathways for reduction of indirect emissions (SDG 9).
- Avoidance of waste (SDG 12).
- Sustainability topics, including climate protection, are managed at Group level by a dedicated department.

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

Measures in the reporting year	Own business activities (OBA) / Value chain (VC)
Commission of a solar power system at the Agawam site (Pennsylvania, USA)	OBA
Increasing the recycling rate for plastic products	OBA
Establishment of a plastic edgeband product range with up to 100% secondary material	OBA and VC
Reduction of total energy consumption	OBA
Reduction of GHG emissions compared to the previous year	OBA
Screening of PCF-reduced materials	VC
Reduction of hazardous waste	OBA
Conversion of the vehicle fleet to electric vehicles	OBA
Reduction of VOC emissions	OBA
Commission of wastewater treatment at Rayong site	OBA
Installation of charging infrastructure for electric vehicles	OBA

Planned measures for the 2026 reporting year	Own business activities (OBA)/ Value chain (VC)	Time horizon
Commissioning of wastewater treatment at Sassenberg Site	OBA	In the 2026 reporting year
Increase the recycling rate for plastic products.	OBA	In the 2026 reporting year
Reduction of specific energy consumption	OBA	5-10 years
Reduction in GHG emissions	OBA	In the 2026 reporting year
Reduction of hazardous waste	OBA	In the 2026 reporting year
Implementation of the "Zero Pellet Loss" standard at all plastic processing sites	OBA	2026-2029

No remedial measures were carried out during the year under review. The listed measures are managed and implemented by the Sustainability Department together with the cooperation of the BU Management Teams and with the involvement of the environmental and sustainability officers at the locations. The implementation of measures is linked with the budget process and the available financial and personnel resources. Decisions on projects with necessity for substantial CAPEX or OPEX are based on their effectiveness and considered on a case-by-case basis. A fixed budget for climate-neutrality measures is currently not envisaged.

An initial action plan for reduction of Scope 3 emissions is being prepared and is projected to be available by the reporting year 2026.

Metrics and targets

DR E1-4: Targets related to climate change mitigation and adaptation

The following disclosures must be provided in relation to the SURTECO Group’s GHG targets:

Category	Details
Base year	2019
Gross emissions in the base year (Scope 1 & 2)	95,915 tCO ₂ e
GHG reduction target by 2030	-50% related to 2019
Reduction achieved to date (by 2025)	-44% related to 2019
Annual reduction by 2030	5% of the previous year’s figure in each case
Scope 1 & 2 emissions	60 % / 40 %
“Net Zero” (Scope 1, 2 & 3)	2045

GHG emissions from Scope 1 & 2 were recorded for the reporting year. An initial list of Scope 3 emissions is planned for the business year 2026.

All the locations belonging to the Group and relevant sources of emission are recorded for the identification of all direct and indirect GHG emissions in Scope 1 & 2. The base value for acquisitions and divestments is adjusted for the reference year. If there are any changes to the base value, the reduction target for 2030 remains unchanged.

The main decarbonisation lever for achieving the 2030 target is increasing the proportion of electricity purchased from renewable sources.

The SURTECO Group will set out its detailed GHG emission reduction targets together with its climate-protection measures in a graphical pathway representation after they have been submitted to the Science Based Targets Initiative (SBTi) and verified. The submission to the SBTi is planned by 2026. Comparison with a climate scenario is also planned in this connection.

DR E1-5: Energy consumption and mix

The reporting period for energy consumptions and GHG emissions corresponds to the reporting year. During this period, there were no material changes in the Group structure.

The figures presented were consolidated on the basis of information obtained from the individual subsidiary companies, with the main source of information being invoices from the energy utility companies.

During the reporting year, 338,561 MWh of energy were consumed by the SURTECO Group, which corresponds to a decrease of 2 % compared with 344,129MWh in 2024. This reduction is attributable to external market factors, as well as operational adjustments and shifts in the energy consumption profile.

Energy consumption and mix		
MWh	2024	2025
Fuel consumption from coal and coal products	0	0
Fuel consumption from crude oil and petroleum products	13,821	10,950
Fuel consumption from natural gas	146,738	143,135
Fuel consumption from other fossil sources	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	48,434	42,927
Total fossil energy consumption	208,993	197,012
	Share of fossil sources in total energy consumption (%)	61
Consumption from nuclear sources	13,197	10,672
	Share of consumption from nuclear sources in total energy consumption (%)	4
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	32,256	38,405
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	89,086	90,990
The consumption of self-generated non-fuel renewable energy	597	1,482
Total renewable energy consumption	121,939	130,877
	Share of renewable sources in total energy consumption (%)	35
Total energy consumption	344,129	338,561

The energy consumption arises partly from the use of primary energy combustion fuels, such as natural gas or heating oil, and through the procurement of external energy, mainly in the form of electricity. In order to reduce possible environmental impacts, the SURTECO Group is pursuing an energy transition to renewable energy sources.

The share of renewable energy in the energy mix rose from 35 % in 2024 to 39 % in 2025.

The Group continues to pursue the sourcing of their electricity exclusively from renewable energy. In 2025, 68 % of the electricity consumed was generated from renewable sources, after 61 % in 2024.

A smaller proportion of the energy originates from own generation by means of photovoltaic systems. This energy is used almost entirely at the Group's own facilities. In the reporting year, 1,482 MWh of electricity consumed was generated by the SURTECO Group, after 597 MWh in the year 2024. In addition to the existing

installation in Portugal, Australia and Italy, this increase reflects the new photovoltaic system in the USA, which became operational in 2025.

The SURTECO Group is defined (Directive (EU) 2022/1288) as partly active in sectors (Sector C: Manufacturing Industry) that are classified as sectors with high climate impact. The SURTECO Group uses energy intensity as a Key Performance Indicator (KPI) in order to monitor energy efficiency at its operating facilities. The group-wide energy intensity for the business year 2025 amounts to sales of 412 MWh / € million, after 402 MWh / € million in fiscal year 2024. The total energy consumption decrease from 338,561 MWh in 2025 compared to 344,129 MWh in 2024. The decrease in sales of 4 % compared to the previous year was partially offset by the decrease in 2 % of the energy consumption.

Energy intensity per net revenue MWh / € million	2024	2025	Variation
Total energy per net revenue (Net revenue see ESRS 2; DR SBM1)	402	412	2.5%

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

In spite of the efforts directed towards environmental protection, emissions into the atmosphere cannot be completely avoided. They also constitute side effects of production processes such as waste or consumption of resources and raw materials. Emissions are subject to limit values that are defined by operating licences for our plants issued by government agencies. The SURTECO Group monitors compliance with these limit values at individual locations through having measurements taken by independent third parties.

The direct emissions of CO₂ equivalent (Scope 1) arise as a result of the combustion of fossil energy sources in the company's own power plants or by emissions caused within the organization, for example from heating energy or thermal exhaust-gas treatment. Emission values were calculated on the basis of the energy sources used, such as gas or heating oil, and the global warming potential (GWP) of the Federal Office for Economic Affairs and Export Control (BAFA).

The indirect Scope 2 emissions in the form of CO₂ equivalents are caused mainly by external energy purchases in the form of electricity. Market-based and location-based GWPs were taken into account for the calculation. The market-based figures were taken directly from the individual energy suppliers of the SURTECO Group. Whenever information was not available, the values used correspond to the location-based values. The values were then determined on the basis of location-based GWPs, which were obtained from the International Energy Agency (IEA). Of the purchased electricity, 64% was bundled with Guarantees of Origin and Renewable Energy Certificates. The remaining 36 % came from the conventional electricity mix, of which 9 % was from renewable sources, 22 % from nuclear energy and 69 % from non-renewable sources.

As far as total GHG emissions are concerned, it can be assumed that the emissions in the upstream and downstream value chain, i.e. Scope 3 emissions, outweigh the total emissions from Scope 1 and 2. The Group is planning to submit figures on this matter in the coming reporting year.

The total volume of CO₂ equivalents emitted by the SURTECO Group, which comprise the direct and indirect emissions from its business activities, amounted to 54,135 tons of CO₂e in the reporting period 2025.

In 2025 there was a decrease in total CO₂e emissions by 5%, from 57,202 tons of CO₂e in 2024.

This decrease is primarily due to the ongoing conversion of locations to green electricity, particularly purchased green electricity (Scope 2), which led to a decrease by 5 % compared with the entire previous year. Furthermore, minor deviations are due to improvements in data quality, as work is continuously being done to improve the accuracy of measurement.

t CO ₂ e _q	Base year	Retrospective		Variation in %	Milestones and target years			Annual % target / Base year			
		2024	2025		2026	2030	2045				
Scope 1 GHG emissions											
Gross Scope 1 GHG emissions	39,597	34,412	32,462	-5.7 %	5 % (Scope 1 & 2) Previous year	50 % (Scope 1 & 2) Base year	Net Zero (Scope 1, 2 & 3) under assessment	-18 %			
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0	0	0	-				-			
Scope 2 GHG emissions											
Gross location-based Scope 2 GHG emissions	52,870	46,581	40,642	-12.7 %				-23 %			
Gross market -based Scope 2 GHG emissions	56,318	22,790	21,673	-4.9 %				-62 %			
Significant scope 3 GHG emissions											
Total Gross indirect (Scope 3) GHG emissions			Under assessment					-			
Total GHG emissions											
Total GHG emissions (location-based)	92,467	80,993	73,104	-9.7 %				-21 %			
Total GHG emissions (market-based)	95,915	57,202	54,135	-5.4 %				-44 %			

The use of natural gas by the SURTECO Group amounted to 54 % of the total greenhouse gas emissions in 2025. Electricity with a proportion of 37 % comes next. The remaining 9 % essentially result from the use of combustion fuels, district heating and the combustion of wood and waste, with a small proportion resulting from the release of harmful substances and gases.

The SURTECO Group releases biogenic emissions from the combustion of non-recyclable wood and paper waste, with a proportion of 1 % of total emissions (market-based GHG emissions in Scope 1 and 2) in 2025.

As noted, external market factors, operational adjustments, and changes in the energy consumption profile impacted overall energy use, which is reflected in greenhouse gas emissions, such as Scope 1.

For Scope 2, a significant difference is observed between location-based and market-based emissions. Location-based emission factors show a worldwide decrease, driven by a transformation of the electricity mix away from fossil fuels. Market-based emissions also trend downward. However, in certain high-demand facilities in USA, supplier emission factor increased compared with the previous reporting period, making the overall reduction less pronounced.

The group-wide emission intensity for the business year 2025 amounts to 66 t CO₂e / € million sales for a total volume of CO₂e emissions amounting to 54,135 tones.

Energy intensity per net revenue			
t CO ₂ eq / € million	2024	2025	Variation
Total GHG emissions (location-based) per net revenue (Net revenue see ESRS 2; DR SBM1)	95	89	-6 %
Total GHG emissions (market-based) per net revenue (Net revenue see ESRS 2; DR SBM1)	67	66	-1.5 %

Calculation of Scope 3 GHG emissions

No Scope 3 emissions data are available for the reporting year. The Group's diverse business areas and the wide variety of raw materials used make a reliable estimation complex, as any figure would depend on numerous assumptions and could be misleading. A robust assessment of Scope 3 emissions requires a tailored approach beyond standard calculation methods.

Quantitative disclosures are planned for the next reporting year, with data-collection and calculation methodologies currently being developed to ensure accuracy and reliability.

DR E1-7: GHG removals and GHG mitigation projects financed through carbon credits

The Group does not support any projects in own business or in the upstream or downstream value chain for the breakdown or storage of greenhouse gases.

DR E1-8: Internal carbon pricing

There is no internal CO₂ pricing system within the company.

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

The SURTECO Group reviews the anticipated financial impacts arising from climate-related risks and opportunities. Currently, no strategies, measures or targets have been defined and there will therefore be no disclosure in the first year of the Sustainability Statement. The SURTECO Group is working towards defining the targets by 2029.

ESRS E2 POLLUTION

Impact, risk and opportunity management

DR related to ESRS 2 IRO-1: Description of the process to identify and assess material pollution-related impacts, risks and opportunities

Using the methodology for the materiality analysis described in DR IRO-1, which can be found in the section *Impact, risk and opportunity management of the ESRS 2 General Disclosures* standard, the SURTECO Group has identified its material impacts, opportunities and risks.

In addition to the process referred to, additional factors were taken into account for the assessment of the topics relating to the circular economy, for example:

- screening of the most important pollutants for each manufacturing process and activities in the value chain,
- potential receptors taking into account the type of pollutants, the handling conditions and the existing measures,
- understanding of the composition of the raw materials used and their potential impacts on substances of concern and microplastics,
- existing treatment systems and preventive measures,
- Individual results from monitoring of pollutants,
- Emission limit values.

Affected communities were not integrated in the reporting year.

Production locations where chemical raw materials are processed or stored have a higher risk in relation to environmental pollution than sites where exclusively sales or administrative activities take place. This difference was taken into account in the course of risk assessment, as production sites can cause potentially higher environmental impacts, for example through emissions, wastewater or handling hazardous substances. Risks arise here essentially during transport or delivery procedures by suppliers. Chemicals raw materials and subsidiary materials are stored in containers or on premises specially designed for this purpose. Finally, it is important to note that risk profiles can vary within the group of manufacturing locations depending on the production process and geographical location.

No incidents were registered during the reporting period that resulted in financial penalties or sanctions being levied by government authorities.

DR E2-1: Policies related to pollution

The SURTECO Group operates on the basis of the guiding principle of “avoidance before reduction before mitigation” and in the case of waste the principle “avoidance before reduction before recovery”.

All questions relating to CO₂ emissions were already addressed in the chapter Climate change E1 and will not be further discussed in the following sections. Where necessary, air control systems are installed.

Air pollution

Wherever possible, we use water as the solvent in our lacquers, paints or impregnations. For technological reasons, however, the use of organic solvents and the associated emissions cannot always be avoided. In all cases, the SURTECO Group complies with the statutory limit values, partly by the use of thermal afterburning of exhaust air.

SOC or SVHC

The SURTECO Group places a great importance on the responsible handling of chemicals and is actively working on avoiding substances that are classified as SOC (Substances of Concern) or SVHC (Substances of Very High Concern) in its formulations. Substances of this nature are only used if there are no alternatives in order to maintain the high requirements for product quality and functionality. Ensuring that these substances are only used in the quantities that are permitted under the statutory regulations.

Furthermore, we review the contents of our formulations regularly and carefully. The compositions are reviewed at fixed intervals and when relevant developments occur – for example changes in the statutory regulations or new scientific findings – and the formulations are modified as necessary. This approach underscores our commitment to the protection of people and the environment, along with our obligation to consistently comply with the statutory regulations.

Microplastics

Plastic granulate is used as raw material in the extrusion processes carried out by the SURTECO Group. All handling and further processing is carried out in closed systems in order to avoid pollution of the environment by microplastics. This prevents the release of microplastics. A high standard of cleanliness is absolutely essential here. The disclosures provided only relate to delivery and internal activities within the company.

DR E2-2: Actions and resources related to pollution

The measures implemented by the SURTECO Group follow the guidance in the EU Action Plan "Towards Zero Pollution for Air, Water and Soil" and the ISO guidelines for environmental management 14001.

Air pollution

The SURTECO Group complies with the statutory limit values, partly by using thermal exhaust air afterburning. This also applies to the limit values for exposure in the workplace. As appropriate, additional afterburning systems (RTO – Regenerative Thermal Oxidation) are installed. The SURTECO Group commissions external measurements in order to monitor the volume of emissions and has these carried out as part of environmental management.

SOC or SVHC

One of the subsidiary companies works with melamine impregnations. The free amounts of melamine in our products are below the prescribed limit values.

Furthermore, formaldehyde emissions arise in wastewater or in the air at some of our locations. Contaminated wastewater is collected and treated by specialized companies. If emissions are released into the air, biological or thermal after-treatment is carried out in order to avoid the release of formaldehyde into the atmosphere. Wherever substances of concern are used, the availability of less harmful substances is assessed on a regular basis.

Microplastics

Even though all processes related to the handling of plastic granulate have to be carried out in closed systems, accidental spillage cannot be avoided. In order to further reduce the entry of the plastic granulate into the environment, the SURTECO Group is targeting certification in accordance with the guidelines of the “Zero Pellet Loss Initiative” for all locations using plastic granulate within the next five years. This also includes training for employees and optimization of processes in order to avoid unintended spillage. The SURTECO Group is committed to minimizing potential risks by preventive measures.

Avoidance of incidents and emergency plans

The SURTECO Group has implemented a comprehensive risk management and emergency policy in order to systematically avoid potential environmental incidents and emergency situations, and to minimize impacts on people and the environment. These measures extend to our own activities.

1. Avoidance of incidents and emergency situations

The company implements the following measures for proactive prevention of environmental pollution and emergencies:

- Regular risk analyses:
- Identification of potential environmental risks by systematic location assessments and audits (in accordance with the ISO standard).
- Assessment of hazardous substances.
- Technical prevention measures:
- Use of safety technology such as leakage and emission monitoring systems.
- Automated shutdown systems.
- Closed transfer and processing systems in order to avoid leakages.
- Organizational measures:
- Regular training sessions for employees in safety-critical processes and emergency measures

2. Limiting the impacts of incidents and emergency situations

If an incident occurs in spite of the preventive measures, comprehensive emergency and containment measures are available:

- Immediate measures in the event of incidents:
- Available emergency plans for various scenarios (e.g. chemical leakages, fires, major incidents).
- Provision of emergency equipment (e.g. mobile absorbers, protective barriers, neutralization agents).
- Rapid activation of internal emergency teams and crisis staffs.
- Environmental and health measures:
- Close exchange with local authorities and environmental protection organizations.
- Immediate analysis and monitoring of environmental impact following an incident.
- Medical protective measures for affected employees.
- Learning processes and improvements:
 - à Systematic follow-up after incidents to identify optimization potential.
 - à Adjustment of safety and environmental policies on the basis of the findings gained.

This comprehensive approach enables the SURTECO Group to ensure that potential environmental pollution caused by incidents is largely avoided and the impacts are minimized.

Metrics and targets

DR E2-3: Targets related to pollution

Air pollution

The SURTECO Group currently has not yet formulated a target for the reduction of VOC emissions. Nevertheless, compliance with the relevant statutory framework conditions and the emission limits is guaranteed. The monitoring and compliance with these limit values is carried out by accounting the quantities of materials containing VOCs purchased and used. These calculations allow the emissions to be monitored and ensure that the statutory requirements can be complied with consistently.

SOC or SVHC

The SURTECO Group has not yet defined a target for reducing SOCs or substances of high concern (SVHC). Nevertheless, compliance with the relevant statutory requirements is strictly monitored. This is carried out by accounting for the quantities of materials containing SVHCs and continuously checking the permissibility of these substances in accordance with the applicable regulations. Consequently, the SURTECO Group ensures that no inadmissible quantities of SVHCs are used in its products or production processes.

Microplastics

The SURTECO Group currently has not yet defined a target for the avoidance of microplastics but it is already implementing measures directed towards avoiding the release of microplastics. Wherever possible, operations are carried out in closed-loop systems in order to further reduce environmental pollution.

We have defined a target of certification in accordance with the guidelines of the "Zero Pellet Loss Initiative" within the next 5 years for locations which use plastic granulate.

DR E2-4: Pollution of air, water and soil

Emissions in air, water and soil

Despite the efforts centred on environmental protection, emissions cannot be completely avoided. Emissions are subject to limit values that are defined by operating licences for production plants and laid down by government agencies or defined in legal frameworks. The SURTECO Group monitors compliance with these limit values at the individual locations by independent measurements carried out by government agencies.

Preventive control systems have been installed at some locations in order to minimize the impacts exerted by the release of pollutants into the air, water and soil, for example regenerative thermal exhaust air cleaning systems to reduce air pollutants and chemical treatments to minimize the impact of pollution from water discharges.

On the basis of individual assessments at the specific locations, the limit values defined in Annex II of the Directive (EC) No. 166/2006 of the European Parliament and the Council (European Pollutant Release and Transfer Register – EPRTR Regulation) were not exceeded for the pollutants listed there. In addition, no violations were identified for the Group.

SURTECO is committed to going beyond compliance with legal limits by minimizing the release of pollutants and continuously improving its environmental performance. A specific focus is on reducing solvent emissions and decreasing the impacts of formaldehyde.

The emissions from volatile organic compounds (VOC) amounted to 1,205 tons in 2025, compared with 1,630 tons in 2024. Not all locations were completely recorded so that an estimate was undertaken on the basis of the processes and historical data.

Pollution of air		
Tons	2024	2025
Volatile Organic Compounds (VOC)	1,630	1,205

The information was recorded individually for each production location and consolidated for the purposes of reporting. The emissions were calculated by direct measurements taken from air samples or from location-specific data combined with material flow data (mass balance).

Formaldehyde emissions are associated with the business activities of the SURTECO Group by air and water discharges. End-of-pipe technologies are installed in addition to the measures that are carried out during the development and manufacturing phase in order to avoid or minimize emissions. The emissions released into the air are monitored as part of the solvent pollutants, while the emissions into the water are minimized or avoided by means of chemical treatments to reduce formaldehyde pollution or by transferring contaminated water to specialized waste disposal companies for further treatment. The emission data for formaldehyde are determined by direct measurements of air and water samples.

The release of emissions from cooling and heating systems, which mainly use refrigerant gases, can also exert impacts. Interventions are carried out by specialized third-party companies in order to prevent releases of this nature. These systems primarily use fluorinated greenhouse gases, which are addressed in ESRS E1 Climate change under DR E1-6. Other materials which can lead to the depletion of the ozone layer are used exclusively in closed systems. Wherever possible, the SURTECO Group uses refrigerant gases without any potential for ozone depletion.

Other pollutants such as carbon monoxide, nitrogen oxides and particles for the air, as well as organic total carbon, chloride and total nitrogen for water are closely monitored and controlled, with emissions consistently below the defined limit values.

The Group uses microplastics in their processes by sourcing them from plastic resins and additives and producing them through internal recycling of by-products. The development of measuring methods and the derivation of quantitative data is planned for a period of 3 years. Furthermore, no incidents were reported in connection with microplastics in 2025.

DR E2-5: Substances of concern and substances of very high concern

The SURTECO Group does not yet have any consolidated information about the potential use of the affected substances for the Group. However, all the companies within the Group comply with the statutory requirements like REACH and Proposition 65. The aim is to draw up a quantity and classification overview over a period of 3 years.

DR E2-6: Anticipated financial effects from material pollution-related impacts, risks and opportunities

As referred to in DR E1-9, the SURTECO Group has not disclosed the expected financial impacts of material risks from the environmental impacts or opportunities arising from the avoidance and reduction of environmental pollution in the first year of its Sustainability Statement. There is currently no disclosure of specific indicators and targets for DR E2-6. No measures or targets have been defined which would be necessary for collecting and providing appropriate data. The company envisages a time period of 3 years for the development of strategies and objectives.

ESRS E5 RESOURCES USE AND CIRCULAR ECONOMY

Impact, risk and opportunity management

DR related to ESRS 2 IRO-1: Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

Using the methodology for the materiality analysis described in DR IRO-1, which can be found in the section *Impact, risk and opportunity management of the ESRS 2 General Disclosures* standard, the SURTECO Group has identified its material impacts, opportunities and risks.

In addition to the process referred to, additional factors were taken into account for the assessment of the topics relating to the circular economy, for example:

- Dependence on resource consumption in the manufacturing process,
- Attributes of materials and the proportion of primary, secondary and bio-based raw materials,
- Internal recycling practices for by-products,
- Properties of products taking into account the circular principles,
- Classification of the generated waste by its hazardous properties and the type of treatment,
- Waste management practices,
- Regulation and trends in the emerging economies.

The affected communities were not integrated in the reporting year.

DR E5-1: Policies related to resource use and circular economy & DR E5-2: Actions and resources related to resource use and circular economy

Strategies and measures of the SURTECO Group to improve the use of resources and circular economy relate to the following areas:

Key topic	Risks	Opportunities	Strategy & measures
Material efficiency and waste prevention	- Loss of resources due to production waste - Rising disposal costs	- Cost savings through more efficient use of materials - Reduction of environmental pollution	- Optimization of production processes - Use of modern technologies - Quality controls - Employee training to promote resource-conserving working methods - Use of modern technologies and equipment - Promotion of resource-saving processes through internal standards (e.g. operational excellence)
Circular economy and resource conservation	- High use of primary plastics - Regulatory requirements for plastics recycling	- Cost savings through recycling - Image and competitive advantages through sustainable materials	- Implementation of closed material loops for the recycling of production waste - Promoting the use of recyclates and bio-based plastics - Returning production waste to the manufacturing process

			<ul style="list-style-type: none"> - Products made from recycled plastics - Cooperation with suppliers and recycling companies - Involvement in industry associations
Climate change and emissions reduction	<ul style="list-style-type: none"> - Increasing regulatory requirements - Reputational risks 	<ul style="list-style-type: none"> - Competitive advantages through emissions reduction - Cost savings through energy efficiency 	<ul style="list-style-type: none"> - Optimization of production facilities to reduce energy consumption - Increased use of renewable energies to replace fossil fuels - Definition of reduction targets - Use of energy-efficient technology - Cooperation with external partners - Implementation of the ISO 50001 energy management system
Energy supply and decarbonization	<ul style="list-style-type: none"> - Volatility of energy prices - Dependence on fossil fuels 	<ul style="list-style-type: none"> - Cost stability through renewable energies - Improved ESG rating 	<ul style="list-style-type: none"> - Analysis and gradual replacement of fossil fuels - Conversion to electric drying systems - Electrification of the company fleet - Investments in emission-free technologies
Sustainable material procurement	<ul style="list-style-type: none"> - Limited availability of sustainable alternatives - Higher raw material costs 	<ul style="list-style-type: none"> - Innovation potential through new material solutions - Differentiation in the market 	<ul style="list-style-type: none"> - Collaboration with suppliers to develop and integrate recycled or bio-based materials - Testing alternative raw materials with a focus on reducing fossil-based ingredients - Promoting new material solutions with a reduced environmental footprint - Strengthening partnerships to develop innovative solutions for the circular economy

Metrics and targets

DR E5-3: Targets related to resource use and circular economy

As a supplier of semi-finished products, the SURTECO Group operates almost exclusively in the B2B sector in the industries highlighted, i.e. with only a few exceptions, our semi-finished products only become end products for consumers after further processing. The following aspects are pursued in relation to the waste hierarchy, depending on the relevant semi-finished products:

- Increase in the material usage rate oriented towards the circular economy,
- Minimization of primary raw materials
- Sustainable procurement and usage of renewable resources.

The focus here is on the increase in use of secondary raw materials.

The SURTECO Group is currently developing concrete measurable targets in various environmental areas, which are to be established within the next three years. The focus is on the reduction of hazardous waste, the increase in energy efficiency and a higher recycling rate in plastic processing. The objectives of the reduction of CO₂ emissions (Scope 1 and 2) and for climate neutrality are described in section 1.

DR E5-4: Resource inflows

The following table provides information about the material inflows used during the reporting period. The overview is restricted to the main components which are used to manufacture our products.

- Paper for printing or impregnation
- Plastic raw materials
- Plastic foils
- Coatings
- Printing inks
- Impregnations solutions
- Additives
- Packaging
- Water

On the basis of the definition, paper and bio-based materials belong to the so-called biological materials while plastics, chemicals and other materials are grouped with technical resources.

Resource inflows account for a total overall weight of 149,167 tons in 2025 (2024: 171,557 tons), covering raw materials and packaging materials.

Resource inflows		
Tons	2024*	2025
Technical materials	109,410	98,694
Biological materials	53,052	42,684
Packaging	8,270	7,789
Percentage that is sustainability sourced (in %)	26	22
Total amount of secondary products and materials	5,001	5,207
Share of secondary products and materials (in %)	3	3
Overall total weight of products and materials	171,557	149,167

*Values have been reviewed for consistency with the scope of disclosure

Regarding raw materials, coverage exceeds 95% of the total materials purchased. Materials representing only marginal quantities were not consolidated, as they are considered immaterial. For packaging, data coverage remains partial, as not all sites have been fully reported.

Consumable and auxiliary materials are not considered material to overall resource inflows and have therefore been excluded from the scope of this report. An assessment of the relevance of semi-manufactured goods is ongoing, with a focus on mitigating the risk of double counting, particularly in intra-group transfers.

The data is derived from a combination of direct measurements and supplier-based estimates. Most raw materials were sourced from internal systems and could be readily converted to a common mass unit, as

they are typically purchased in this unit or include density information in their technical specifications. Packaging materials, however, are more complex. The variety of units (e.g., pieces, meters, square meters, rolls), specifications, and formats required estimates in some cases to ensure all data could be consistently consolidated.

The percentage of sustainably sourced biological products and materials, as well as the share of secondary products and materials, is calculated based on the total overall weight.

In the SURTECO Group's production processes involving plastics, production scrap or conveyor offcuts are collected, processed and wherever possible returned to the production cycle. In order to avoid double counting, resources arising from re-use and recycling are separately recorded in production reports or material-flow analyses. We carry out clearly defined reporting logistics. Reused products are not counted as recycled materials.

Water consumption

SURTECO draws approximately 35 % of its water from the public water pipeline grid and around 65 % from wells or rivers. The biggest proportion of the water is used for cooling or cleaning purposes and it is discharged back into the public drainage system or directly into rivers after it has been used and following appropriate treatment and processing. Only a very small proportion of the volume of water withdrawn is associated with the manufacture of printing inks and lacquers. During the reporting year 2025, the volume of water consumed by the SURTECO Group amounted to 0.084 million cubic meters, after 0.153 million cubic meters in the previous year. The water consumption and its quantities are not of a magnitude that has a significant negative impact.

DR E5-5: Resource outflows

Products and materials

The SURTECO Group manufactures products and materials from the raw materials referred to for the areas of furniture, flooring, transport and construction. These are almost exclusively semi-finished products, which are further refined to create the final product.

- Decorative printing and finish foils
- Release papers and foils
- Thermoplastic foils and edgebandings
- Laminates
- Technical extrusions and roller shutter systems
- Skirtings
- Coated fabrics

Direct disclosure on the durability of our products is not possible because this depends primarily on the further refinement by our customers and the conditions under which the final products are used.

Our semi-finished products are fundamentally recyclable, but the actual reusability also depends on the processing and the additives in the final product.

Repairability of our semi-finished products is not envisaged. The packaging materials used are in principle 100 % recyclable.

Waste

The avoidance of waste takes precedence over recycling and disposal of waste at the SURTECO Group in accordance with the waste avoidance hierarchy. Efforts to minimize the generation of waste are therefore already integrated in the early phases of product development and manufacture. Unavoidable production waste is forwarded to specialized disposal companies for professional disposal.

The waste generated at the SURTECO Group is primarily not hazardous. It resembles domestic waste and is made up of materials such as paper, wood, plastics and metal. Hazardous waste is also produced such as liquids and sludges contaminated by chemicals. Building rubble following modification works on buildings may be generated as well.

Part of the waste from production can be returned to the internal production process. This primarily relates to plastics, which are collected by type and then shredded (recyclates). The proportion of recyclates in the overall volume of waste plastics corresponds to the plastics recycling rate. In the business year, 2025, this was around 68 %, after 65 % in 2024 (not all sites were recorded in full). The remaining materials that could not be reused internally were accordingly forwarded for external recovery.

The waste for disposal is sent to suitable waste-disposal companies depending on the type of waste to be treated. The process is documented in internal records and the quantities are tracked and documented separately by type of waste.

The information is collected individually, recorded separately for each location and then consolidated for purposes of reporting. The volumes of waste are determined through inventory readings, waste documents and transport manifests, and by information provided by the operators. The recorded information may rely on estimates in some cases.

The total volume of waste at the SURTECO Group amounted to 22,895 tons in 2025 (2024: 25,774 tons). This corresponds to a decline of 11 % compared to 2024. This decrease is driven by the elimination of construction-related waste at a subsidiary in 2024 and by process improvements under the Operational Excellence projects, which, in addition to enhancing process efficiency, also promote the internal reuse of materials such as plastics, inks, and pigments.

A reduction target of 5 % was established for hazardous waste in 2025 and a reduction of 11 % was achieved.

Waste Tons	2024	2025
Non-hazardous waste		
Preparation for reuse	0	0
Recycling	10,710	10,496
Other recovery operations	1,516	1,240
Hazardous waste		
Preparation for reuse	0	0
Recycling	104	410
Other recovery operations	4,379	4,380
Total amount diverted from disposal	16,709	16,526
Non-hazardous waste	0	0
Incineration	1,369	929
Landfill	4,865	3,452
Other disposal operations	43	315
Hazardous waste		
Incineration	2,114	1,332
Landfill	302	260
Other disposal operations	342	30
Total amount directed to disposal	9,035	6,318
Total amount of non-recycled waste	14,930	11,937
Percentage of non-recycled waste (in %)	58	52
Total amount of Non-hazardous waste	18,503	16,431
Total amount of hazardous waste	7,241	6,464
Total amount of radioactive waste	0	0.010
Total amount of waste generated	25,744	22,895

The reported radioactive waste came from an instrument containing sealed radioactive sources, commonly used as nuclear (gamma) gauges for measurement applications, and was managed and disposed of in full compliance with applicable regulatory requirements.

Wherever possible, care is taken to ensure that packaging materials are repeatedly reused both between suppliers and the SURTECO Group and also between customers and the SURTECO Group. Apart from the standardized pallets typically used (Europallets), this also applies to special pallets and special means of transport (e.g. hanging transport of rolls). Wherever feasible, open transport in mesh crates is the method of choice.

DR E5-6: Anticipated financial effects from material resource use and circular economy-related risks and opportunities

As referred to in DR E1-9, the SURTECO Group is not disclosing the expected financial impacts of material risks and opportunities in connection with the use of resources and the impacts of the circular economy in the first year of its Sustainability Statement. Uniform and binding measures for increasing resource efficiency and circular economy still need to be defined and corresponding processes implemented and then underpinned by KPIs. The timeframe for disposal is in the region of 3-5 years.

Social information

ESRS S1 OWN WORKFORCE

Strategy

DR related to ESRS 2 SBM-2: Interests and views of stakeholders

The employees of the SURTECO Group are the focal point of the strategic direction of the company based on the guiding principle of "A company I like to work for". A central role is played here by the initiative that is directed towards better understanding their interests and opinions. We refer to the information described under DR SBM-2, which offers more comprehensive information on the engagement practices and the interests and perspectives of all stakeholders. These are outlined in the section "Strategy" of the *ESRS 2 General Disclosures* in this statement.

DR related to ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

Using the methodology for materiality analysis described in DR IRO-1, which can be found in the section *Impact, risk and opportunity management of ESRS 2 General Disclosures*, the SURTECO Group has identified its material IRO.

When analyzing the impacts on the Group's own workforce and the impacts that may arise in relation to the strategy and business model, the SURTECO Group also takes account of additional factors such as:

- Corporate culture, values and principles of the organization (Code of Conduct and human rights declaration)
- Results from the process of internal auditing
- Risk management and whistleblower systems
- Employment practices
- Indicators from human resources
- Regulations and internationally recognized human rights instruments
- Transition plans for the reduction of GHG emissions

The business model of the SURTECO Group is based on manufacturing processes. The high level of digitalization and automation entails opportunities and risks. On the one hand, the dependence on a workforce of qualified employees presents potential challenges in relation to adequate staff availability. On the other hand, the need for employees creates jobs and this exerts a positive impact on the surrounding communities.

The value chain and the business relationships of the company also exert various impacts. These can present risks and opportunities for the workforce of the SURTECO Group. The strategic alignment of the company, particularly in relation to planned changes, influences the workforce. Specific risks in relation to forced or child labour could not be identified on the basis of assessments related to geography or activities.

The employment practices of the SURTECO Group not only affect members of staff employed directly but also to external workers, such as independent traders or employees of partner companies which supply workers (in accordance with NACE Code N78). The majority of employees have permanent contracts to create a stable platform for personal and career development. This enhances the sense of security for employees,

improves the work-life balance and simultaneously increases the commitment and long-term loyalty to the company. As a consequence, the stability of the employment relationship contributes to knowledge retention and increase in productivity.

Specific working models such as shift work can also exert impacts. Such practices can offer the workforce more flexibility but they can also have negative impacts on the physical and mental health of employees. These models also allow the SURTECO Group to improve process optimization through operational flexibility and to increase production capacity.

Social security can also exert impacts on employees and companies. Inadequate social security can be a hazard to the work-life balance between family and career of the employees and this can lead to an increase in absenteeism as well as impairing smooth-running operations.

The occupational health and safety of the workforce is a top priority for the SURTECO Group. Implementation of a robust safety management system is extremely important in order to avoid potential accidents which could impact the employees. Naturally, accidents exert impacts on employees but they also impact on the organization. Some of the risks include interruptions to operations leading to productivity losses, increased insurance premiums, legal liabilities and reputational damage.

Risks are also entailed in the transition plan for climate protection. The derived measures or those measures still to be derived for reduction of CO₂ emissions can lead to technological changes that may result in changed qualification profiles for employees. There is also a risk of having to shut down the operation of CO₂-intensive production facilities.

Material matters for a topic, a sub-topic or a sub-sub-topic covered by this standard are as follows:

- Working conditions

Impact, risk and opportunity management

DR S1-1: Policies related to own workforce

The success of the SURTECO Group is substantially based on the knowledge and the commitment of its employees. Each individual in the company makes a positive contribution through their work to the company and at the same time gains an opportunity to undergo further personal development.

Diversity, equal opportunity and inclusion are a top priority for the company and central to our vision. This outlook promotes an environment in which people with diverse backgrounds and with a broad range of abilities can contribute significant value added. In line with our corporate values, we are committed to offering attractive social benefits and wide-ranging opportunities for individual development, while at the same time ensuring the well-being and health of our employees across the world. This objective is supported by our occupational health and safety management system.

Corporate Human Resources at the SURTECO Group directs the human resources strategy and establishes group-wide guidelines, processes and standards for our workforce in order to improve the development and efficiency of our employees.

We are also dedicated to foster a culture based on fairness and respect. In conjunction with our human rights officer and based on the SURTECO Group's human rights policy, we are committed to upholding the human rights of our employees and ensuring fair and equal treatment as a fundamental aspect of our work ethic. This commitment encompasses compliance with group-wide codes of conduct and safeguards against discrimination, harassment, child labour and retaliation, as issued by the Management Board. Discrimination is expressly interpreted to encompass reasons related to race and ethnic origin, skin colour, gender, sexual orientation, gender identity, disability, age, religion, political opinion, national origin or social background, and other forms of discrimination that are defined in EU legal regulations and national legislation. Support measures for inclusion are implemented within the Group to meet specific needs and individual requirements.

The employees of the SURTECO Group receive comprehensive training on compliance with these standards. Furthermore, a binding Group regulation includes detailed instructions on personnel matters.

Our guidelines are based on the following internationally recognized reference tools for human rights and the environment in alignment with the United Nations Guiding Principles on Business and Human Rights:

- Universal Declaration of Human Rights of the United Nations
- International Covenant on Civil and Political Rights of the United Nations
- International Covenant on Economic, Social and Cultural Rights of the United Nations
- Sustainable Development Goals (SDGs) of the United Nations
- Principles of the United Nations Global Compact
- Charter of Fundamental Rights of the European Union
- Conventions and recommendations of the International Labour Organization on labour and social standards
- Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises
- Eight ILO Core Conventions on Forced Labour, Child Labour, Discrimination, Freedom of Association and the Right to Collective Bargaining

Before entering into new business relationships, we conduct careful checks on our suppliers. If there are any human-rights or environmental breaches or potential violations, the Compliance Team introduces appropriate investigative measures. If this results in confirmation, we promptly request and implement appropriate remedial measures. Depending on the severity of the violation, this may result in termination of business relations.

SURTECO guarantees the necessary level of safety and its continuous improvement with a variety of audits, reviews and checks. Production plants and other technical installations, warehouses, and laboratories are recorded at all the locations. The realized safety concepts are put on the test stand during the course of audits. If there are any non-conformities with the standard, appropriate corrections are carried out that are agreed with the responsible process owners. Their implementation is then checked at regular intervals. Employees are informed about the risks entailed by their work in the context of workplace safety and occupational health and safety. Systematic checks are carried out at workstations where hazardous substances are handled.

The efforts to avoid occupational accidents are a constituent element of production activity and require supervisors to work continuously at enhancing the motivation of employees. Insofar, the number of occupational accidents can be continuously reduced, even if they cannot be entirely avoided.

The indicators defined as KPI for the topic of occupational safety include accident statistics, along with fluctuation rate and length of service.

Furthermore, the following disclosure obligations describe the process of the SURTECO Group for involving the company's own workforce, the available anonymous whistleblower system and the work of the Compliance Committee for highlighting concerns and the processes implemented to remedy negative impacts. The declarations provided in this section apply to all employees referred to in this context.

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

The SURTECO Group proactively promotes open dialogue between employees and provides various internal channels of communication in order to communicate and discuss company-specific topics and options for improvement:

- Workplace and staff meetings
- Informal online discussions between managers and employees
- Employee meetings
- Surveys on employee satisfaction

We attach great importance to integrating our staff in the business processes through constructive dialogue and ensuring prompt and comprehensive communication about internal changes while complying with national and international regulations. Furthermore, our representatives of the Group Works Council are members of the Supervisory Board. The interests of the employees are embedded within the strategy of the SURTECO Group and they play a key role in aligning the workforce with the corporate goals and hence contribute to the overall success of the company.

We assess the commitment of our employees through structured feedback interviews and surveys. These interactions enable us to appraise the effectiveness of our initiatives and to undertake any necessary improvements. Our last survey covered a series of topics including workforce engagement, working environment, communication, inclusion and workload. There is no focusing or prioritization concerning specific groups within the workforce.

We foster an open dialogue in an atmosphere of trust with employee representatives and also make use of the regular workforce meetings and information events for managers under the leadership of the Management Board. The members of the Executive Management Team act as multipliers for further trickle-down communication of information from the Management Board to the organization and ultimately to all employees.

All these activities are supported by regular information and notices, the Intranet and videocasts by the executive management and the Management Board.

Further insights into the engagement practices, and the interests and views of the stakeholders, particularly our own employees, can be found in the information in DR SBM-2, which can be found in this statement under Strategy in ESRS 2 General Disclosures.

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

Alongside direct communication with supervisors, the SURTECO Group provides employees with four formal means or channels in order to communicate their concerns and needs directly to the company (grievance mechanisms). These are as follows

- Questions at staff meetings (also possible anonymously)
- Whistleblower system (also possible anonymously)
- Works Council
- Human Resources Department

These channels are an integral component of the compliance and quality-management processes and they guarantee accessibility and effectiveness for all those concerned. Complaints are systematically recorded and processed by the Human Resources Department. Remedial measures are assessed and any appropriate action is taken.

The SURTECO Group is committed as advocates for the protection of whistleblowers, assistants in investigations and individuals subject to wrongful accusations. Their identity is treated in strict confidence but it is possible for individuals to reveal their identity voluntarily. The company pursues a policy of zero tolerance towards retaliation, discrimination or harassment of individuals who submit complaints or assist in investigations. Furthermore, individuals are also protected if they have been unjustly accused of wrongdoing. The protection is ensured by a Compliance Committee appointed by the Management Board.

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

The SURTECO Group makes strenuous efforts and invests considerable resources into the management of material impacts, risks and opportunities in connection with its workforce. The aim is to create secure workplaces and above-average working conditions in order to promote equal opportunities, development and productivity.

In order to improve the quality of work and employee loyalty, the SURTECO Group provides secure workplaces with a low proportion of temporary employment while prioritizing internal opportunities for career development. Flexible reintegration programmes, for example following parental leave, and flexible working models accompanied by remote working are offered. Competitive compensation systems guarantee fair pay, and diverse training, and competence development programmes promote talented individuals and managers. An open dialogue with the workforce and their representatives is proactively encouraged.

The culture of health and safety in the workplace is strengthened by regular risk assessments and enhanced by health-and-safety training. Accident analyses serve to minimize risks and promote continuous improvement of safety-at-work practices. The promotion of physical and mental health is supported by the provision of sports and health facilities.

Talented individuals are identified and promoted in the course of learning, training and competence development. A high-performance culture is supported by performance appraisal meetings.

Flexible working hours and a well-calibrated work-life balance are also furthered through part-time and full-time contracts with flexible working hours, the possibility of remote working and temporary changes of location, and diverse opportunities for special leave in the event of family and personal needs. Parental leave programmes are also available.

The remuneration and social benefits comprise competitive salary structures based on transparency and fairness. The remuneration structures are reviewed on an annual basis in order to guarantee equal pay. A variety of social benefits support employees in different living situations.

The SURTECO Group promotes freedom of association and collective bargaining through a culture of open dialogue with all employees and offers opportunities for organization and representation through collective bargaining.

The effectiveness of the measures is tracked by means of regular reviews of HR indicators for optimization of human-resource strategy, monitoring of learning programmes in accordance with recognized evaluation models, surveying workforce satisfaction and commitment and annual analysis of remuneration policy to maintain equal opportunities. Diversity strategies are appraised in order to identify potential for improvement. Measures to combat violence and harassment are continuously monitored.

These comprehensive measures promote a sustainable improvement in working conditions and employee retention over the long term.

Metrics and targets

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

Up to now, no quantitative targets were defined for the management of significant negative impacts, promotion of positive impacts and the management of material risks and opportunities. The SURTECO Group envisages defining these targets within the next 3 years.

DR S1-6: Characteristics of the undertaking's employees

The gender distribution at the SURTECO Group for the reporting year 2025 remains similar to the previous year: 81 % (2024: 82 %) of the workforce are male and 19 % (2024: 18 %) are female.

Number of employees (head count)		
Gender	2024	2025
Male	3,050	2,982
Female	682	713
Other	0	0
Not reported	0	0
Total employees	3,732	3,695

The workforce is distributed over the regions of Europe with an amount of 58 % (2024: 54 %), America 27 % (2024: 27 %) and Asia-Pacific 15 % (2024: 15 %). Germany represents the highest percentage of employees at 41 % (2024: 40 %), followed by the USA at 15 % (2024: 16 %) and Thailand at 9 % (2024: 9%).

Number of Employees (head count)		
Country	2024	2025
Germany	1,490	1,499
USA	588	572
Thailand	347	339
Brazil	261	254
Portugal	247	250
United Kingdom	174	179
Canada	152	130
Sweden	116	118
Indonesia	101	100
Australia	96	97

4 % of the employees are not listed in the table. They are distributed in the countries of Mexico, Poland, Italy, France, Russia, Czech Republic, Singapore, China and Japan.

In relation to the type of contract, 98 % (2024: 99 %) of the employees have a permanent contract of employment and there are no deviations in terms of gender. As far as working hours are concerned, 94 % (2024: 95 %) of the employees of the SURTECO Group worked on a full-time basis in 2025. A slight differentiation can be determined on the basis of gender: 97 % (2024: 97 %) of the male employees compared with 82 % (2024: 83 %) of the female employees worked full time. The average length of service worldwide in 2025 was 13.3 years (2024: 12.8 years).

2025				
Female	Male	Other	Not Disclosed	Total
Number of employees (head count)				
713	2,982	0	0	3,695
Number of permanent employees (head count)				
708	2,931	0	0	3,639
Number of temporary employees (head count)				
4	51	0	0	55
Number of non-guaranteed hours employees (head count)				
1	0	0	0	1
Number of full-time employees (head count)				
585	2,884	0	0	3,469
Number of part-time employees (head count)				
128	98	0	0	226

For purposes of disclosure, the category "Direct Employee" relates to all employees whose functions or tasks are directly related to the production of goods. The category "Indirect Employee" relates to all other employees, which may include functional areas such as production management, logistics, sales, human resources, finance and others.

Number of Employees by category (head count)	2024	2025
Direct employees	1,956	1,907
Indirect employees	1,776	1,788

„The group-wide“ employee turnover was 16 % as in the previous year.

Employee Turnover	2024	2025
Employee turnover (head count)	615	598
Employee turnover rate (in %)	16	16

The information was collected individually and consolidated for purposes of reporting. This personnel figure is based on the average number of employees during the reporting period, as outlined in the consolidated management report.

DR S1-7: Characteristics of non-employees workers in the undertaking's own workforce

Generally employed for a defined period or a specific project, often in order to replace absent employees or to cover a seasonal requirement, and mainly recruited from work agencies, specialised in “employment activities” (NACE Code N78). The proportion of non-employees in the SURTECO Group workforce is less than 1 % and the majority of the positions are under the category of direct employees. There were no changes compared to the last year.

The assessment is based on the total number of non-employees at the end of the reporting period.

DR S1-8: Collective bargaining coverage and social dialogue

A total of 59 % (2024: 58 %) of SURTECO employees are covered by collective bargaining agreements, and 51 % (2024: 51 %) of employees are represented by employee representatives.

2025 Coverage Rate (for countries with >50 empl. or representing >10% total empl.)	Collective Bargaining		Social dialogue
	Employees	Employees	Workplace representation
	EEA	Non-EEA	EEA
0 - 19 %	-	Asia-Pacific	Portugal
20 - 39 %	-	-	-
40 - 59 %	-	America	-
60 - 79 %	-	-	-
80 - 100 %	Germany Portugal Sweden	-	Germany Sweden

The coverage rate takes into account the number of employees who are covered in each country or each region by collective bargaining agreements or employee representatives, in relation to the total number of employees in this country or this region, if they have more than 50 employees or make up more than 10 % of the total workforce (see the breakdown of employees by countries in DR S1-6).

DR S1-9: Diversity metrics

Diversity shapes the corporate culture of the SURTECO Group. Across the world, employees from more than 50 different nationalities are part of the Group's workforce.

Employees by nationality in %	2024	2025
German	35	36
US - American	16	14
Thai	9	9
Brazilian	8	8
Portuguese	5	5
British	4	4
Canadian	4	4
Swedish	3	3
Australian	3	3
Other nationalities	13	11

The proportion of female employees in the total workforce of SURTECO is 19 % (2024: 18 %) for the reporting year 2025. At the highest management level, the Senior Management Team (1st level below the Management Board), the proportion of women is 12 % (2024: 11 %). The targeted proportion of women on the Management Board and the Supervisory Board of the SURTECO Group was not achieved in the current business year.

The average age of all employees is 44.6 years after 43.8 years in the previous year.

Employees by age group in %	2024	2025
Under 30 years	15	15
30 - 50 years	46	45
Over 50 years	39	40

DR S1-10: Adequate wages

Consolidated information for all Group companies is not yet available. The SURTECO Group intends to collect and consolidate the information in the following years, ensuring a higher level of completeness and data maturity.

DR S1-11: Social protection

The total workforce of the SURTECO Group has social security through public programmes or benefits provided by the company. This cover is in accordance with applicable standards in the event of one or more major life events (e.g. illness or parental leave).

DR S1-12: Persons with disabilities

A policy of non-discrimination and integration is part of the corporate values of the SURTECO Group. Within the Group, 3 % (2024: 2 %) of the workforce are people with disabilities. If the distribution of employees by

gender is analysed, the percentage of people with disabilities is very similar with 2 % (2024: 2 %) for female and 3 % (2024: 2 %) for male.

The information was recorded individually and consolidated for reporting purposes. The different statutory definitions and guidelines in the various countries where the Group is operating are taken into account.

DR S1-13: Training and skills development metrics

The Group management of the SURTECO Group, the site managements and all employees are integrated within a process of continuous improvement. Alongside training sessions and qualification measures, the regulations, processes, rules and instructions embedded within the management system form the foundation for ensuring the productivity of the employees. The SURTECO Group is currently establishing a leadership development program and building talent pools for key positions to ensure continuity and support the long-term development of its workforce. In the reporting year 2025 as well as in the last year, 49 % of the employees took part in regular performance and career development meetings. On the basis of the gender distribution, 56 % (2024: 53 %) of the female employees and 48 % (2024: 48 %) of the male employees took part in the assessments. In the 2024 sustainability report, the percentages of male and female employees were reversed.

Overall, 41,404 training hours (2024: 45,610 training hours) were recorded across the Group. Out of these, 22 % (2024: 32 %) were attributed to onboarding training sessions and 30 % (2024: 21 %) to safety training sessions. In addition, topics such as human rights and environmental prevention were addressed, albeit to a lesser extent.

Training and skills development	2024	2025
Number of training hours	45,610	41,404
Average training hours per employees	12	11
Training hours per gender		
Average training hours per female employees	18	17
Average training hours per male employees	11	10
Training hours per category		
Average training hours per direct employees	13	12
Average training hours per indirect employees	11	11

The employee figures including the total numbers by gender and category are provided in section DR S1-6 – Characteristics of the undertaking’s employees (pay gap and total compensation).

Owing to the short term of their contracts, non-employees are generally not subject to review. However, training is carried out for all workers at SURTECO. There is no consolidated information yet about all Group companies for non-employees.

DR S1-14: Health and safety metrics

The safety of our workforce is a top priority at the SURTECO Group. All employees are covered by a health and safety management system. 16 % of the workforce are covered by a system based on recognized standards certified by an external party.

Additional information on recognized standards and certifications, in particular in relation to occupational health and safety, is available in DR SBM-1: Strategy, business model and value chain. You can find such information in this statement under the section Strategy of ESRS 2 General Disclosures.

In the course of the reporting year 2025, no fatalities resulting from work-related injuries or illnesses were recorded for our own workers or among other workers in the value chain while working at our facilities. However, 117 occupational accidents were recorded with a total of 2,871 days of absence. Out of a total of 6,469,752 working hours, this yields an accident frequency rate of 18.1 accidents for every 1 million working hours. In fiscal year 2024, there were 101 workplace accidents across the group, resulting in 2,453 lost work-days. With a total of 6,929,991 hours worked, this equates to an accident rate of 14.6 accidents per 1 million hours worked in 2024.

Occupational accidents	2024	2025
Number of occupational accidents	101	117
Number of days lost due to occupational accidents	2,453	2,871
Frequency rate per 1 million working hours	14.6	18.1

DR S1-15: Work-life balance metrics

More than 95 % (2024: 95 %) of the employees working in the Group are entitled to holiday for family reasons. In the reporting year 2025, 12 % (2024: 15 %) of the entitled employees took leave for family reasons. For the gender distribution, the proportion is rather similar: 16 % (2024: 18 %) of the eligible female employees took leave for family reasons, compared with 11 % (2024: 15 %) of the eligible male employees.

The information was collected individually and consolidated for the purposes of reporting.

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

Consolidated information for all Group companies is not yet available. The SURTECO Group intends to collect and consolidate this information in the coming years, ensuring a higher level of completeness and data maturity.

DR S1-17: Incidents, complains and severe human rights impacts

In the business year 2025 as well as in 2024, no suspected cases and no confirmed cases of human rights violations were registered in the SURTECO Group.

Governance information

ESRS G1 BUSINESS CONDUCT

Governance

DR related to ESRS 2 GOV-1: The role of the administrative, supervisory and management bodies

Information on the roles and competences of the Management Board and the Supervisory Board of SURTECO is listed in DR GOV-1. This information can be found in the section Governance of ESRS 2 – General disclosure standard of this statement.

Impact, risk and opportunity management

DR related to ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities

SURTECO determined its material impacts, risks and opportunities using the methodology for the materiality analysis, which is described in DR IRO-1 and in the section Impacts, risk and opportunity management of the ESRS 2-Standards for General Disclosure found in this statement.

In addition to the process referred to above, other factors were taken into account when assessing the issues relating to business conduct, such as:

- Corporate culture, values and principles of organization (Code of Conduct and Human Rights Declaration)
- Results from the internal audit processes,
- Risk-management and whistleblowing systems,
- Antitrust and competition practices,
- Procedure for combatting corruption and conflicts of interest.

The following material matters and topics, sub-topics and sub-sub-topics are covered by this standard:

- Corporate culture

DR G1-1: Corporate culture and business conduct policies and corporate culture

We place great importance on a good reputation of SURTECO in the business world, this extends to our customers, investors, employees, authorities and the public. Our corporate culture forms the basis for this.

The corporate culture of the SURTECO Group is defined in the group-wide Code of Conduct and it undergoes continuous further development within the framework of the corporate strategy. This corporate culture is based on the values of reliability, engagement, transparency, integrity and fairness. It includes the following principles:

- Lawful and ethically sound conduct in compliance with legislation and other legal requirements, and cultural framework conditions,
- Loyalty to the company,
- Fair, polite and respectful dealings with all employees and third parties,
- Taking adequate account of the interests of customers and business partners,
- Social engagement,
- Commitment to sustainable business, environmental protection and occupational safety,

- Refraining from any form of discrimination based on gender, race, religious beliefs or other characteristics,
- Responsible and transparent handling of risks,
- Professionalism, fairness and reliability in all business relationships.

The Code of Conduct applies to all organizational units of the SURTECO Group. The Code is issued to every employee and explanations are provided. This has been assisted by translating the Code into all national languages relevant for the Group. SURTECO expects and encourages its business partners to introduce and implement comparable principles in their companies as well as use these as the basis for their mutual relationship. While training on the Code of Conduct has taken various forms to date, a standardized annual online training program will be implemented for all employees in the future to ensure Group-wide compliance with the Code of Conduct. The principles of the Code of Conduct are complemented by internal guidelines, which are specifically directed towards combatting corruption, bribery and money laundering, the avoidance of conflicts of interest and compliance with antitrust and competition law. All managers working in the company are committed to ensuring compliance with the Code and carrying out checks as necessary. This applies particularly to functions that are most vulnerable to corruption and bribery, such as management teams or the purchasing department. Every employee is encouraged to seek advice and assistance from their supervisors, the relevant departments, the Compliance Officer or employee representatives if they are harbouring legal doubts about their own conduct or become aware of legally questionable activities in their working environment. In order to safeguard compliance, SURTECO conducts compliance training within the framework of its Governance Strategy. These issues are managed through an online training system conducted on an annual basis and the training is mandatory for all employees. The programme has already been launched in Germany and is gradually being rolled out across the entire Group.

The company has established a binding supplier code of conduct for its suppliers. This code defines clear minimum requirements for cooperation and is based on internationally recognized standards such as the United Nations Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights, the Convention on the Rights of the Child, key labor standards, and the UN Global Compact. Furthermore, the code is consistently aligned with the requirements of the Supply Chain Due Diligence Act (LkSG) and thus forms the basis for a responsible and legally compliant supply chain.

Employees and external third parties have access to a whistleblower system that enables them to report any breaches of the Code of Conduct or other violations. Reports can also be submitted anonymously. The protection of whistleblowers is ensured by a Compliance Committee appointed by the Management Board. Any action by the committee is guided by an internal policy. The Monitoring and identification of compliance incidents is carried out by Internal Audit, the Compliance Officer and the Head von Investor Relations who are responsible for dealing with compliance topics within the organization. Training on the whistleblower system was conducted at the German locations using a digital training format. A gradual rollout has been initiated at the other locations. The aim is to implement the training program across the entire Group in the future and to conduct it at least once a year at all locations.

DR G1-3: Prevention and detection of corruption and bribery

The system for prevention of corruption and bribery is made up of appropriate guidelines that were drawn up within the framework of the Compliance-Management-System. These have clear rules, examples and measures for reducing the risk of corruption. These guidelines are disseminated through a management system available across the Group. Communication of information is supported through messages in the Intranet. The company carries out training sessions for all employees on general compliance principles for purposes of prevention. These training sessions provide explanations of the definition of corruption and bribery, and they present concrete measures and examples concerning prevention and avoidance mechanisms. Corruption and bribery can be reported confidentially in a whistleblower system. This is available in all national languages of the SURTECO Group and also to external third parties. A defined Compliance Team manages this process and reports directly to the Management Board. This safeguards the independence of the management chain. If measures of the Compliance Team are adopted or recommended a report is submitted directly to the Management Board. Otherwise, the Management Board is informed by the Compliance Officer about the cases under investigation in the course of regular reporting. Suppliers are provided with information about the general prohibition on corruption and bribery in the Supplier Code of Conduct. During the business year 2025, SURTECO carried out compliance training sessions, which provided information on combatting corruption and bribery. This training is mandatory for every employee and is carried out on an annual basis. In 2024, the online training system was implemented in Germany and it is gradually being rolled out across the world. In 2025, 49 percent of employees worldwide had access to training, and 32 percent of employees worldwide completed the compliance basics training. Targeted training courses are planned for high-risk functions such as management teams and the purchasing department. Members of the administrative, management and supervisory bodies of SURTECO GROUP SE did not receive separate training on the prevention of bribery and corruption in 2025.

Metrics and targets

DR G1-4: Confirmed incidents of corruption or bribery

In the business year 2025 as well as in 2024, no cases of corruption or bribery were identified. No judgments or financial penalties were handed down. The measures adopted in order to counteract breaches against procedures and standards for combatting corruption and bribery have essentially been based on the checks carried out by Internal Audit, which regularly carries out inspections of the locations.

* The contents of this section "Non-financial Statement" have not been audited.

Contact

Martin Miller
Investor Relations
Johan-Viktor-Bausch-Straße 2
86647 Buttenwiesen

T: +49 8274 9988-508
martin.miller@surteco.com

surteco.com