

# VSME REPORT

**(VOLUNTARY SUSTAINABILITY REPORTING  
STANDARD FOR NON-LISTED SMES)**

MONTANWERKE   
BRIXLEGG 



# FOREWORD

Dear readers!

The year 2024 was shaped by significant developments in the field of sustainability. We have decided to remain true to our established approach and, for the fifth consecutive financial year, present a sustainability report.

As a 100 % recycling-based circular-economy company, we consider it our responsibility to transparently communicate to our employees, customers, suppliers and additional stakeholders how we act in the areas of environment, social topics and corporate governance. These topics complement each other and contribute to a livable future as well as to the long-term stability of the Montanwerke Brixlegg — as a reliable employer, supplier, customer, and social partner. Due to the current legal situation, we are exempt from reporting under the ESR standard. Nevertheless, in order to ensure a high level of transparency, we decided to prepare our report for the 2024 financial year based on the comprehensive VSME guideline, thereby continuing to fulfill our commitment to provide comprehensive information.

The double materiality analysis conducted in 2024 enables us to address the topics identified as material for us and our stakeholders – including circular economy, energy efficiency and social responsibility.

The Executive Board of Montanwerke Brixlegg AG



**The Executive Board of Montanwerke Brixlegg AG**

**Dipl.-Kfm. Volker Pawlitzki (CCO)**  
**Mag. Gabriele Punz-Praxmarer (CFO)**  
**Dr. Dietmar Leitmeier (CTO)**

# VSME COMPREHENSIVE

## B1 - BASIS FOR PREPARATION | § 24

During the reporting period, we took comprehensive measures to comply with ESG standards. Our sustainability declaration was prepared individually and follows the comprehensive VSME version, which transparently discloses all relevant information. We are classified as a non-listed stock corporation (AG).

Key financial figures:

		2020	2021	2022	2023	2024
Balance sheet (EUR million)	§ 24 (e) (iii)	450.1	554.6	534.2	541.9	589.5
Turnover (EUR million)	§ 24 (e) (iv)	829.7	1,193.0	1,215.6	949.8	1,239.1
Number of employees (headcount, annual average)	§ 24 (e) (v)	330	350	335	344	340

### Report Information

- **Report module:** comprehensive
- **Confidential data:** none omitted
- **Legal form:** non-listed stock corporation (AG)
- **NACE sector classification:** C - 24 Manufacture and processing of metals
- **Headquarters:** Werkstrasse 1-3, 6230 Brixlegg, Austria

# VSME COMPREHENSIVE

## B1 - BASIS FOR PREPARATION | § 24

### ESG-Certifications

- ISO9001:2015 (Quality Management), TÜV Süd, valid until 30.06.2025
- ISO14001:2015 (Environmental Management), TÜV Süd, valid until 30.06.2025
- ISO45001:2018 (Health & Safety), TÜV Süd, valid until 30.06.2025
- EFB Certification (Waste Management), TÜV Süd, valid until 26.07.2025
- SURE Certification (Biomass fuels), SGS Germany, valid until 20.12.2024
- Recycled Content Copper Cathodes, SCS Global, valid until 23.02.2025
- Product Carbon Footprint Copper Cathodes: 629 kg CO<sub>2</sub>eq, TÜV Süd, valid until 31.03.2027
- Product Carbon Footprint Electric Furnace Formats: 834 kg CO<sub>2</sub>eq, TÜV Süd, valid until 31.03.2027
- Product Carbon Footprint Asarco Formats: 589 kg CO<sub>2</sub>eq, TÜV Süd, valid until 31.03.2027
- Product Carbon Footprint Silver: 92 kg CO<sub>2</sub>eq, TÜV Süd, valid until 31.03.2027
- Product Carbon Footprint Platinum-Palladium Cementate: 3,688 kg CO<sub>2</sub>eq, TÜV Süd, valid until 31.03.2027
- Product Carbon Footprint Nickel sulphate: 1,906 kg CO<sub>2</sub>eq, TÜV Süd, valid until 31.03.2027
- Product Carbon Footprint Gold: 6,829 kg CO<sub>2</sub>eq, TÜV Süd, valid until 31.03.2027

These certifications demonstrate our commitment to quality, environmental protection, occupational safety and sustainable production.



# VSME COMPREHENSIVE

## C1 – STRATEGY: BUSINESS MODEL AND SUSTAINABILITY-RELATED INITIATIVES | § 47

Since 1977, we have specialized in the recovery of copper from secondary raw materials (recycling materials). Through our multi-stage copper-refining process, we produce Grade-A copper and valuable by-products such as gold, silver, platinum, palladium (powder), iron silicate, nickel sulphate and copper oxychloride. Nonferrous dusts containing metals are sold to smelters that recover the contained metals. We position ourselves as a circular economy company that actively contributes to resource conservation and waste reduction.

### Core Product Groups

#### Copper Products:

Copper cathodes Grade A

Casting formats: Billets and Cakes in various alloys

#### Precious Metals:

Gold granules

Silver granules

Platinum/Palladium-powder

#### Special Products:

Nickel sulphate

Iron silicate stone

Flowbrix (fungicide for agriculture)

Copper oxychloride (active ingredient in Flowbrix and comparable fungicides)

Magnesium sulphate

#### Valuable Materials without Product Characteristics:

Non-ferrous metalbearing filter dusts

# VSME COMPREHENSIVE

## C1 – STRATEGY: BUSINESS MODEL AND SUSTAINABILITY-RELATED INITIATIVES | § 47

### Coremarkets

We operate strictly in the B2B sector. Our primary customers are semi-finished product manufacturers, wire producers and metal traders. The main market is Europe.

### Key Business Relationships

Copper-bearing secondary raw materials are sourced from metal traders, cable recycling companies and industrial companies (e.g., cable manufacturers, automotive suppliers).

### Core Elements of the Sustainability Strategy

Our strategy focuses on circular economy, energy efficiency and resource conservation.

100 % of purchased electricity comes from renewable sources. Approx. 17 % is generated on-site via hydropower and photovoltaics.

Process steam is reused in electrolysis, the nickel sulphate plant and for the heating of buildings. Cooling water originates from Alpbach and groundwater, which is purified before being released back into the river Inn.

# VSME COMPREHENSIVE

## B2 – PRACTICES, POLICIES AND FUTURE INITIATIVES FOR TRANSITIONING TOWARDS A MORE SUSTAINABLE ECONOMY | § 26

As part of our efforts toward a more sustainable economy, we have implemented various practices and initiatives addressing different dimensions of sustainability. These initiatives are designed to consider both environmental and social aspects and form part of our longterm strategy to improve our environmental and social performance.

Practices and Initiatives	Measures / Initiatives	Publicly available	Objectives	Responsible executive	Source
Own workforce	yes	no	Yes – see ISO audit reports	Alexander Senn (LBS)	Certifications ISO9001, ISO14001, ISO45001; Code of Conduct/CoC Montanwerke Brixlegg AG
Workers in the value chain	yes	no	Yes, see Code of Conduct MWB	Volker Pawlitzki (CCO)	Code of Conduct/CoC Montanwerke Brixlegg AG
Pollution	yes	no	Yes, see ISO-certificates, environmental program/targets; world`s lowest PCF-CO <sub>2</sub> eq for copper cathodes	Christian Ehrenstrasser (UB), Lorenz Canaval (QM)	Certifications ISO9001, ISO14001, ISO45001; EFB-certificate 2025;PCF-certificates; Recycled Content cathodes/billets_Cakes; SURE certificate
Circular economy	yes	no	Yes, see waste management concept, recycled content certificates	Christian Ehrenstrasser (UB), Lorenz Canaval (QM)	Waste management concept; 100 % Recycled Content; EFB-, SURE certificate
Corporate governance	yes	no	Yes, see ISO9001 audit	Lorenz Canaval (QM)	Certifications ISO9001, ISO14001, ISO45001; Code of Conduct/CoC Montanwerke Brixlegg AG

**Conclusion:** These practices and initiatives form part of our commitment to sustainable development. We aim to continuously improve our approaches and increase transparency for both internal and external stakeholders.



# VSME COMPREHENSIVE

## B3 – ENERGY AND GREENHOUSE GAS EMISSIONS

Analysis of energy consumption and GHG emissions shows that part of our energy consumption comes from renewable sources, while gross GHG emissions vary across scopes. These insights are crucial for our strategic orientation regarding sustainability and climate protection.

Category	Electricity	Fuels
Usage renewable energy	77,293,093 kWh	9,569,780 kWh
Usage of non-renewable energy	0 kWh	164,227,668 kWh

## GHG BALANCE ACCORDING TO GHG PROTOCOL

Category	Emissions (tCO <sub>2</sub> eq) Fiscal Year 2024	Category	Emissions (tCO <sub>2</sub> eq) Fiscal Year 2024	Category	Emissions (tCO <sub>2</sub> eq) Fiscal Year 2024
<b>Scope 1 GHG Emissions</b>		<b>Scope 2 GHG Emissions</b>		<b>Scope 3 GHG Emissions</b>	
<b>Scope 1 GHG Emissions (gross)</b>	<b>35,163.79</b>	<b>Scope 2 GHG Emissions (gross, location-based)</b>	<b>0.00</b>	<b>Scope 3 GHG Emissions (gross)</b>	<b>58,152.71</b>
1.1 Stationary combustion	34,459.07	2.1 Purchased electricity (location-based)	0.00	3.1 Purchased goods and services	47,982.20
1.2 Mobile combustion	650.69	2.2 Purchased heat (location-based)	excluded	3.2 Capital goods	1,486.22
1.3 Fugitive sources	excluded	2.3 Purchased steam (location-based)	excluded	3.3 Fuel and energy-related activities (not included in scope 1 or Scope 2)	158.22
1.4 Other emissions	54.02	2.4 Purchased cooling (location-based)	excluded	3.4 Upstream transportation	3,224.14
		<b>Scope 2 GHG Emissions (gross, market-based)</b>	<b>0.00</b>	3.5 Waste generated in operations	19.70
		2.1 Purchased electricity (market-based)	0.00	3.6 Business travel	31.24
		2.2 Purchased heat (market-based)	excluded	3.7 Employee commuting	241.45
		2.3 Purchased steam (market-based)	excluded	3.8 Upstream leased assets	excluded
		2.4 Purchased cooling (market-based)	excluded	3.9 Downstream transportation	4,843.31
				3.10 Processing of sold products	excluded
				3.11 Use of sold products	excluded
				3.12 End of life treatment of sold products	166.22
				3.13 Downstream leased assets	excluded
				3.14 Franchises	excluded
				3.15 Investments	excluded
<b>TOTAL EMISSIONS</b>		<b>TOTAL EMISSIONS (LOCATION-BASED)</b>			
		93,316.49 t CO <sub>2</sub> e			
		<b>TOTAL EMISSIONS (MARKET-BASED)</b>			
		93,316.49 t CO <sub>2</sub> e			

# VSME COMPREHENSIVE

## B3 – ENERGY AND GREENHOUSE GAS EMISSIONS

The GHG-intensity of Scope 1 and 2 emissions (location-based) is 28.38 t CO<sub>2</sub>eq per million EUR.

The GHG-intensity of Scope 1, 2 and 3 emissions (location-based) is 75.31 t CO<sub>2</sub>eq per million EUR.

These figures underline our commitment to analyzing emissions closely and taking targeted measures to reduce them. Continuous improvement of energy efficiency and promoting renewable energy remain central components of our sustainability strategy.



# VSME COMPREHENSIVE

## C3 – GHG REDUCTION TARGETS AND CLIMATE TRANSITION | § 54

We aim to reduce the CO<sub>2</sub>equivalent footprint of our copper cathodes (Scope 1, 2 and 3) by 30 % by the year 2030, using 2014 as the base year.

Investments in energy saving and environmental measures have been recorded separately on an annual basis since the fiscal year 2024.

	2015 - 2021	2022 - 2023	2024
Investments in Energy and Environmental Measures (million EUR)	21.6	8	1

# VSME COMPREHENSIVE

## C4 – CLIMATE RISKS | § 57

As part of our sustainability strategy, we have identified several climate related hazards and transformation events that may affect our operations and financial performance. These risks were systematically evaluated to develop appropriate adaptation measures and strengthen the company’s resilience.

### Identified Climate Related Risks

Risk	Type	Description	Exposure and sensitivity Assessment	Time horizon	Adaption Measure
Storm	physical risk	The wind patterns at the company premises are primarily characterized by winds from the eastnortheast and southwest.	Typical wind speeds reach up to 5 m/s, with gusts up to 25 m/s, based on wind statistics (Windfinder).	short-term	Expected storm risks are taken into account in construction projects, following legal building regulations.
Flooding	physical risk	As the site is located directly adjacent to rivers and streams, it lies within a potential floodrisk zone.	During a 30 year flood (HQ30), parts of the site would be flooded, based on HORA floodrisk mapping.	short-term	A flood protection embankment was built (HQ100 + 1m; approx. 520.05 m above sea level).
Drought	transition risk	Cooling and process water supply depends on the availability of both surface and groundwater.	Determination of flow rates, water availability, and water temperatures of neighboring water bodies is regularly performed.	medium-term	Watersaving strategies (reuse, process recirculation, optimized cooling systems) Redundant water supply from both surface and groundwater sources.
Earthquakes	physical risk	The site is located in Zone 2, a mediumhazard area according to Austria’s seismic hazard zoning.	The company premises are located in Zone 2 (medium risk) and earthquakes of magnitude VII can occur, based on the earthquake hazard map.	short-term	Building projects follow seismic building regulations.
Lightning	physical risk	The site lies in an area with medium lightning density.	The company premises are exposed to an average lightning density of 1.1 lightning strikes/km <sup>2</sup> per year (average lightning density in the period from January 1, 2012, to December 31, 2023).	short-term	Buildings are equipped with lightningprotection systems according to ÖVE/ÖNORM EN 623053.



# VSME COMPREHENSIVE

## C4 – CLIMATE RISKS | § 57

### Risk Assessment Summary

All identified climaterelated risks were classified as high, medium, or low.

Currently, there are no discernible potential negative effects of climate risks on financial performance or business activities.



# VSME COMPREHENSIVE

## B4 – POLLUTION OF AIR, WATER AND SOIL | § 32

Reporting on pollutant emissions to air, water and soil is carried out according to legal requirements and within the framework of our environmental management system. This reflects our commitment to transparency and responsibility regarding environmental impacts. Public information on pollutant emissions is available at <https://industry.eea.europa.eu/>

### Pollutant Emissions

**Reporting obligation:** The company reports on pollutant emissions into the air, water and soil both as required by law and as part of the environmental management system.

Substance	Emissions in Air	Emissions in Water	Emissions in Soil
Nickel and compounds (as Ni)	0 kg	27.4 kg	0 kg
Lead and compounds (as Pb)	0 kg	84.7 kg	0 kg
Zinc and compounds (as Zn)	419.4 kg	412.4 kg	0 kg
Copper and compounds (as Cu)	237.5 kg	163.3 kg	0 kg

These figures underline our efforts to minimize environmental burdens and comply with regulatory requirements.



# VSME COMPREHENSIVE

## B6 – WATER | § 35, § 36

Reporting on water withdrawal, consumption, and emissions is a key component of our environmental management system. It is important to emphasize that this site is not located in an area of water stress, which allows us to use our water resources sustainably.

### Water withdrawals and consumption

- **Location:** Brixlegg
- **Located in an area with water stress:** No
- **Water withdrawal:** 1,857,716 m<sup>3</sup>
- **Water consumption:** 1,857,716 m<sup>3</sup>

		2020	2021	2022	2023	2024
Water withdrawal (m <sup>3</sup> )	§ 35	1,893,584	1,746,417	1,720,285	1,701,338	1,857,716
Water consumption (m <sup>3</sup> )	§ 36	1,893,584	1,746,417	1,720,285	1,701,338	1,857,716

The total amount of water withdrawn during the reporting period comes mainly from groundwater sources accessed via several deep wells and, to a lesser extent, from the public drinking water network. The withdrawal is carried out in accordance with water-law permits. In order to reduce the amount of water withdrawn, we are implementing various measures, including water reuse, process recirculation, and the use of recooling systems.



# VSME COMPREHENSIVE

B6 – WATER | § 35, § 36

## Additional Explanations

Groundwater is extracted for operational purposes, especially for cooling and is distributed to consumers via the plant water network. Reducing groundwater extraction is a key part of our sustainable wateruse strategy.

Reporting of wastewater volumes and pollutant emissions into water is conducted according to legal requirements and within our environmental management system. This ensures that we not only comply with regulations but also actively contribute to reducing our environmental impact.

# VSME COMPREHENSIVE

## B7 – RESOURCE USE, CIRCULAR ECONOMY AND WASTE MANAGEMENT | § 37

Reporting on resource use, circular economy and waste management is conducted according to legal requirements and within the framework of our environmental management system. At Montanwerke Brixlegg AG we are committed to applying the principles of the circular economy, which is reflected in the following measures and results.

### Application of circular economy principles

The company actively applies circular economy principles by refining copper-containing secondary raw materials in a multi-stage process and removing impurities (upcycling). This results in the production of high-purity copper, with virtually no waste materials that are not recyclable.

The production processes are designed to minimize waste generation, which is an essential element of effective waste prevention.



# VSME COMPREHENSIVE

## B7 – RESOURCE USE, CIRCULAR ECONOMY AND WASTE MANAGEMENT | § 37

### Waste Management

The total amount of waste generated annually is broken down by type.

		2020	2021	2022	2023	2024
Total waste (t)	§ 38 (a) (b)	6,067	6,376	3,427	3,412	5,505
thereof hazardous (t)	§ 38 (a) (b)	4,289	2,837	2,664	2,403	3,667
thereof non-hazardous (t)	§ 38 (a) (b)	1,778	3,539	764	1,009	1,838
Waste forwarded for reuse/recovery (t)	§ 38 (a) (b)	5,428	5,815	2,832	3,117	3,953
thereof hazardous (t)	§ 38 (a) (b)	3,652	2,290	2,086	2,122	2,127
thereof non-hazardous (t)	§ 38 (a) (b)	1,776	3,525	746	995	1,826
Waste forwarded for disposal/elimination (t)	§ 38 (a) (b)	639	561	595	295	1,552
thereof hazardous (t)	§ 38 (a) (b)	637	547	578	281	1,540
thereof non-hazardous (t)	§ 38 (a) (b)	2	14	18	14	12
Recycling ratio in %	§ 38 (a) (b)	89.5	91.2	82.6	91.4	71.8

# VSME COMPREHENSIVE

## B7 – RESOURCE USE, CIRCULAR ECONOMY AND WASTE | § 37

### Material Flows

The company operates in a sector that uses significant material flows, particularly in the processing of hazardous and non-hazardous waste.

Annual Mass Flow of relevant Materials:

- hazardous waste: 902,780 kg (secondary raw material for recycling, sourced externally)
- non-hazardous waste: 96,797,261 kg (secondary raw material for recycling, sourced externally)

These measures and results demonstrate Montanwerke Brixlegg AG's commitment to sustainable resource use and effective waste management in line with the principles of the circular economy.

# VSME COMPREHENSIVE

## B8 – WORKFORCE – GENERAL CHARACTERISTICS | § 39

The figures show a stable workforce structure. In total, we employ 348 people, of whom 301 are men and 47 are women. The employee turnover rate is 7.41%, indicating relatively high employee retention. The share of women in management positions is 12.5%.

### Employment Data by Contract Type and Gender

		2020	2021	2022	2023	2024
Number of employees with fixed-term contracts*	§ 39 (a) (b)	3	3	3	3	3
Number of employees with permanent contracts (headcount/average)	§ 39 (a) (b)	330	350	335	344	340
thereof women	§ 39 (a) (b)	47	46	44	46	46
thereof men	§ 39 (a) (b)	283	304	291	298	294
Number of temporary workers	§ 60	33	29	21	11	19
How many self-employed sole proprietors work exclusively for the company?	§ 60	0	0	0	0	0
Turnover rate in %	§ 40	3.1	6.3	11.0	6.6	7.4

Due to labor-law provisions, most positions in the company cannot be filled by women. When applying for positions that can be filled regardless of gender, applicants' qualifications, professional experience, and salary expectations determine whether they are hired. The gender of the applicants plays no role in this process.

\*The members of the Executive Board of Montanwerke Brixlegg AG are the only employees with fixed-term contracts.



# VSME COMPREHENSIVE

## B9 – WORKFORCE – HEALTH AND SAFETY | § 41

In the reporting year, our organization continued to focus strongly on the health and safety of our employees. A total of 18 workplace accidents occurred among our own workforce in 2024, with no fatalities. This reflects our ongoing commitment to creating a safe work environment and implementing effective safety measures. The total number of working hours amounted up to 570,549, forming the basis for calculating the accident frequency rate.

### Key Indicators

Category: Own Workforce

		2020	2021	2022	2023	2024
Number of work accidents involving own employees	§ 41 (a) (b)	15	24	16	19	18
Number of fatalities among own workforce	§ 41 (a) (b)	0	0	0	0	0
Hours worked	§ 41 (a) (b)	397,800	593,885	397,800	534,008	570,549
Accident frequency (accidents/1 million hours)	§ 41 (a) (b)	26.3	40.4	28.5	36.4	31.5



# VSME COMPREHENSIVE

## B9 – WORKFORCE – HEALTH AND SAFETY | § 41

### Conclusion

There were no work-related deaths, including those resulting from injuries or work-related illnesses.

The absence of fatalities and the relatively low number of workplace accidents demonstrate that our health and safety initiatives are effective. We will continue to closely monitor these metrics and strive for continuous improvement in our safety practices to ensure the well-being of our employees.

# VSME COMPREHENSIVE

## B10 – WORKFORCE – REMUNERATION, COLLECTIVE BARGAINING AND TRAINING | § 42

		2020	2021	2022	2023	2024
Average gross annual salary women (EUR)	§ 42 (b)					59,160.88
Average gross annual salary men (EUR)	§ 42 (b)					60,524.57
Average number of annual training hours per employee	§ 42 (d)				4.11	7.80
Total training hours per year	§ 42 (d)				1,413.00	2,651.75

Due to labor law provisions, women in production at our company can only be employed in very select positions. Since the intensity of training is linked to the position in the company (production vs. administration), a gender-specific division would not be representative. We adhere to the principle of equality, which means that all employees have the right to further education and training in line with their duties, see Code of Conduct.

**100% of the workforce receives at least the applicable minimum wage** in the reporting country, as required by the legally binding collective agreements negotiated annually by the social partners.

The percentage wage gap was entered as 0. Based on the data, this results in a negative value – specifically -1.56% – as the average hourly wage of female employees is higher than that of our male employees. In this case, the system does not allow negative numbers.



# VSME COMPREHENSIVE

## C6 – ADDITIONAL INFORMATION ON OWN WORKFORCE – HUMAN RIGHTS POLICY AND PROCESSES | § 61

As part of our commitment to human rights and social justice, we have implemented a Code of Conduct (CoC) for our own workforce and the workforce of our business partners. These guidelines are designed to protect the rights and well-being of our employees and to ensure that all workers employed by our business partners enjoy fair and equitable working conditions.

### Code of Conduct and Areas Covered

Category	Covered by policy	Details
Discrimination	yes	Yes, covered in the section on human rights and social justice/discrimination.
Forced labor	yes	Yes, covered in the section on human rights and social justice/forced labor.
Human trafficking	yes	Yes, covered in the section on human rights and social justice/human rights.
Child labor	yes	Yes, covered in the section on human rights and social justice/child labor.
Prevention of accidents	yes	Yes, covered in the section on human rights and social justice/working environment and safety.

# VSME COMPREHENSIVE

## C6 – ADDITIONAL INFORMATION ON OWN WORKFORCE – HUMAN RIGHTS POLICY AND PROCESSES | § 61

### Complaint Mechanism

**Existence:** Yes, the whistleblower system is anonymous, available via intranet or the company website 24/7.

### Confirmed Incidents

Category	Confirmed Incidents	If so, details and measures taken
Forced labor	no	
Child labor	no	
Human trafficking	no	
Discrimination	no	
Others	no	
Prevention of accidents	yes	Reportable accidents are documented and reviewed by the labor inspectorate; measures implemented accordingly.

### Knowledge of human rights violations

**Confirmed human rights violations in the value chain:** No

These measures and policies are part of our ongoing commitment to fostering a safe and respectful work environment that promotes and protects human rights across the entire workforce.



# VSME COMPREHENSIVE

## B11 – CONVICTIONS AND FINES RELATED TO CORRUPTION AND BRIBERY | § 43

During the reporting period, no convictions or fines for violations of anticorruption and antibribery laws have been recorded. This reflects our commitment to maintaining the highest standards of corporate governance and compliance. The absence of violations or penalties demonstrates the effectiveness of our internal control systems and training programs designed to prevent corruption and bribery across all business areas.

### Key Results

- **Convictions: 0**
- **Category:** Violation of anti-corruption and anti-bribery laws
- **Number of confirmed incidents: 0**
- **Fines: 0**
- **Total amount of fines imposed: 0**

These results provide evidence of the integrity and transparency of our business practices. We will continue to proactively ensure that our company remains free of all forms of corruption.



# VSME COMPREHENSIVE

## C9 – GENDER DIVERSITY RATIO IN THE GOVERNANCE BODY | § 65

The governance structure of our organization is a key element of our commitment to sustainability and social responsibility. We recognize that diversity in leadership not only improves decision-making but also reflects our values and dedication to inclusion.

### Presence of a Governance Body

The organization has a governing body that reinforces our commitment to structured oversight and accountability in our sustainability practices.

### Members of the Governance Body

		2020	2021	2022	2023	2024
Members of the governance body	§ 65	3	3	3	3	3
thereof women	§ 65	1	1	1	1	1
thereof men	§ 65	2	2	2	2	2
Ratio of women to men in the governance body in %	§ 65	33	33	33	33	33

## ABOUT THIS REPORT

Due to the current legal situation, this report on the 2024 financial year of Montanwerke Brixlegg AG complies with the comprehensive standard of the voluntary sustainability statement for non-capital market-oriented SMEs (comprehensive VSME). This means that Montanwerke is prepared to report in accordance with the ESR standard in the event of a further change in the legal situation.

The environmental, social and corporate indicators have been supplemented, partially replaced, or deleted for reasons of clarity and in accordance with the requirements of the comprehensive VSME.

The initial accounting of Montanwerke Brixlegg AG's greenhouse gas emissions presented in the report was prepared for the first time for the company for Scope 1, Scope 2, and Scope 3 on the basis of the GHG Protocol. In accordance with the recommendation, the five principles of transparency, consistency, accuracy, completeness and relevance were addressed. The initial accounting was based on limited data depth and less accurate raw data. The corresponding calculation method and data sources were documented (consistency). For future assessments, a materiality analysis (relevance) will be used to determine which emissions will be collected and reported in the future. The principles of accuracy and completeness will be addressed in this process. This process will be presented in the next VSME report in the interests of transparency. The initial assessment has not been audited or certified by third parties.

### Publication

February 2026

# ABOUT THIS REPORT

## Contact

If you have any questions or feedback regarding this report, please contact Ms. Nina Karner.

## Support/Editing/Layout

The layout was provided by NEW STANDARD.STUDIO GmbH, Berlin; the content for the new report was supplied by Montanwerke Brixlegg AG using NetCero software.

## Disclaimer

This sustainability report contains certain forward-looking statements based on current estimates of future developments and currently available assumptions and forecasts. These statements are always subject to a number of risks and uncertainties, meaning that assumptions may prove to be inaccurate and actual developments may differ from those described in this report. Montanwerke Brixlegg assumes no obligation and does not intend to update these forward-looking statements to reflect future events or developments.

## Legal Notice

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