VSME REPORT

(VOLUNTARY SUSTAINABILITY REPORTING STANDARD FOR NON-LISTED SMES)

MONTANWERKE BRIXLEGG

Sustainability – Fiscal Year 2025

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FOREWORD

Dear Readers!

This sustainability report is the sixth in a row. Even though the reporting format has changed over time, we remain committed to transparently reporting on our developments in the areas of environment, social matters, and corporate governance.
We do this not merely for the sake of reporting, but as a means of self-monitoring in order to remain a reliable employer, business partner, and social partner.

For this report, we did not carry out a new double materiality assessment to determine the focus topics, as these remain unchanged. However, we conducted a materiality assessment for the preparation of our greenhouse gas inventory in order to focus this data collection. You can find the result starting on page 9 of our report.

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 Leitlmeier (CTO)

VSME COMPREHENSIVE

B1 - BASIS FOR PREPARATION | § 24

The reporting of Montanwerke Brixlegg AG is based on the Comprehensive approach. This was chosen in order to ensure more comprehensive and detailed sustainability reporting for internal and external stakeholders.

Information about the report

- Confidential data: No confidential or classified data is omitted from the reports.
- Legal form of the company: non-listed stock corporation (AG)
- NACE sector classification: C - 24 Manufacture and processing of metals
- Headquarters: Werkstrasse 1 - 3, 6230 Brixlegg, Austria

Key financial metrics

		2020	2022	2023	2024	2025
Balance sheet (EUR million)	§ 24 (e) (iii)	450.1	534.2	531.9	589.5	701.4
Turnover (EUR million)	§ 24 (e) (iv)	829.7	1,215.6	949.8	1,239.1	1,377.0
Number of employees (headcount, annual average)	§ 24 (e) (v)	330	335	344	340	340

VSME COMPREHENSIVE

B1 - BASIS FOR PREPARATION | § 24

Certifications

- ISO 9001:2015 (Quality Management System); TÜV Süd, valid until 30 June 2028
- ISO 14001:2015 (Environmental Management System); TÜV Süd, valid until 30 June 2028
- ISO 45001:2018 (Occupational Health and Safety Management System); TÜV Süd, valid until 30 June 2028
- EFB certification (specialist waste management company); TÜV Süd, valid until 26 June 2026
- SURE certification (biomass fuels); SGS Germany GmbH, valid until 20 December 2026
- Recycled Content Copper Cathodes, SCS Global, valid until 23 February 2026
- Product Carbon Footprint for copper cathodes at 629 kg CO_2eq, TÜV Süd, valid until 31 March 2027
- Product Carbon Footprint for electric furnace formats at 834 kg CO_2eq, TÜV Süd, valid until 31 March 2027
- Product Carbon Footprint for Asarco formats at 589 kg CO_2eq, TÜV Süd, valid until 31 March 2027
- Product Carbon Footprint for silver at 92 kg CO_2eq, TÜV Süd, valid until 31 March 2027
- Product Carbon Footprint for platinum-palladium cementate at 3,688 kg CO_2eq, TÜV Süd, valid until 31 March 2027
- Product Carbon Footprint for nickel sulfate at 1,906 kg CO_2eq, TÜV Süd, valid until 31 March 2027
- Product Carbon Footprint for gold at 6,829 kg CO_2eq, TÜV Süd, valid until 31 March 2027

As Montanwerke, we hold several certifications that demonstrate our commitment to continuous improvement in employee protection, quality, and environmental management. This information forms the basis of our sustainability reporting.

VSME COMPREHENSIVE

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

Since 1977, we have specialized in recovering copper from secondary raw materials (recycling materials). As part of the “copper refining” process, in addition to Grade A copper, we recover valuable by-products such as gold, silver, platinum, palladium, iron silicate, nickel sulfate, and copper oxychloride. We sell the resulting non-ferrous metal-containing dusts to smelters, which then recover the metals they contain. In this way, we fulfill our self-imposed commitment to being a circular company that actively contributes to resource conservation and waste prevention.

Major 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 in the B2B business. The focus of our sales is in Europe.

Key Business Relationships
Copper-bearing secondary raw materials are sourced from metal traders, cable dismantlers, and industrial companies such as cable and automotive manufacturers. The main customers are semi-finished product manufacturers, wire producers, and traders.

Sustainability-related core elements of the corporate strategy
Our corporate strategy is geared toward circular economy, energy efficiency, and the associated conservation of resources.

We cover 100% of our total electricity demand with green electricity, while generating about 19% of the electricity required through our own small hydropower plants and photovoltaic systems. The remaining electricity is being bougth with certified proof of origin.

The steam generated in the production plants is used in electrolysis and in the nickel sulfate plant, as well as for heating buildings. Process cooling is carried out using water from the Creek Alpbach and groundwater, which is then treated and discharged 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 to move toward a more sustainable economy, we have implemented various practices and initiatives addressing different dimensions of sustainability. These initiatives are designed to take both environmental and social aspects into account and form part of our long-term strategy to improve our environmental and social performance.

Practices and Initiatives	Measures / Initiatives	Publicly available	Targets	Responsible executive	Source
Own workforce	yes	no	Yes, see ISO audit report	Alexander Senn (LBS)	ISO 9001, ISO 14001, ISO 45001 certifications; Code of Conduct/CoC of Montanwerke Brixlegg AG
Workers in the value chain	yes	no	Yes, see Code of Conduct/CoC MWB	Volker Pawlitzki (CCO)	Code of Conduct/CoC of Montanwerke Brixlegg AG
Pollution	yes	no	Yes, see ISO certificates, environmental program/targets; lowest PCF CO_2eq value worldwide for copper cathodes	Christian Ehrenstrasser (UB), Lorenz Canaval (QM)	ISO 9001, ISO 14001, ISO 45001 certifications; Recycled Content Cathodes/Billets_Cakes; EFB; 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 ISO 9001 audit report	Lorenz Canaval (QM)	ISO 9001, ISO 14001, ISO 45001 certifications; Code of Conduct/CoC of Montanwerke Brixlegg AG

Conclusion: The above-mentioned practices and initiatives are part of our commitment to sustainable development. We aim to continuously improve our approaches and increase the transparency of our measures in order to inform and involve both internal and external stakeholders.

VSME COMPREHENSIVE

B3 – ENERGY AND GREENHOUSE GAS EMISSIONS

For our second GHG inventory, based on the 2024 results, we prepared an internal materiality assessment in order to review the relevance of the individual topics. The assessment is based on a scale of 0 to 10 points per criterion; issues scoring at least 10 points are classified as significant.

Category	Emissions (tCO_2eq) - financial year 2024	% share of total emissions 2024	CO_2eq-share(under 5 % = 0; over 5 % = 10)	1. ESG relevance	2. Value of enterprice	3. Stakeholder interest	4. Science & technology	Relevance for 2025 from 10 points
Gross Scope 1 GHG-Emissions	**35,163.79**							
1.1 Stationary combustion	34,459.07	36.93	10	10	10	5	5	yes
1.2 Mobile combustion	650.69	0.70	0	10	10	5	5	yes
1.3 Fugitive sources	excluded							
1.4 Other emissions	54.02	0.06	0	10	10	5	5	yes
Gross location-/marked-based Scope 2 GHG Emissions	**0.00**							
2.1 Purchased electricity	0.00	0.00	0	10	10	5	5	yes
2.2 Purchased heat	excluded							
2.3 Purchased steam	excluded							
2.4 Purchased cooling	excluded							

VSME COMPREHENSIVE

B3 – ENERGY AND GREENHOUSE GAS EMISSIONS

Category	Emissions (tCO_2eq) - financial year 2024	% share of total emissions 2024	CO_2eq-share(under 5 % = 0; over 5 % = 10)	1. ESG relevance	2. Value of enterprice	3. Stakeholder interest	4. Science & technology	Relevance for 2025 from 10 points
Gross Scope 3 GHG Emissions	**58,152.71**							
3.1 Purchased goods and services	47,982.20	51.42	10	10	5	5	5	yes
3.2 Capital goods	1,486.22	1.59	0	10	5	5	5	yes
3.3 Fuel- and energy-related activities (not included in Scope 1 or Scope 2)	158.22	0,17	0	10	10	5	5	yes
3.4 Upstream transportation	3,224.14	3.46	0	10	10	10	5	yes
3.5 Waste generated in operations	19.70	0.02	0	10	10	10	2	yes
3.6 Business travel	31.24	0.03	0	5	1	1	0	no
3.7 Employee commuting	241.45	0.26	0	4	1	3	0	no
3.8 Upstream leased assets	excluded							
3.9 Downstream transportation	4,843.31	5.19	10	10	10	10	5	yes
3.10 Processing of sold products	excluded							
3.11 Use of sold products	excluded							

VSME COMPREHENSIVE

B3 – ENERGY AND GREENHOUSE GAS EMISSIONS

Category	Emissions (tCO_2eq) - financial year 2024	% share of total emissions 2024	CO_2eq-share(under 5 % = 0; over 5 % = 10)	1. ESG relevance	2. Value of enterprice	3. Stakeholder interest	4. Science & technology	Relevance for 2025 from 10 points
Gross Scope 3 GHG Emissions	**58,152.71**							
3.12 End-of-life treatment of sold products	166.22	0.18	0	5	2	5	5	yes
3.13 Downstream leased assets	excluded							
3.14 Franchises	excluded							
3.15 Investments	excluded							
Total emissions (location-/market-based)	**93,316.49**							

The analysis showed that item 3.6 Business travel and 3.7 Employee commuting can be excluded.

Despite comparatively low CO_2eq levels as well, we have classified points 3.3 Activities related to fuels and energy, 3.5 Waste generation in operations and 3.12 Treatment of products at the end of their lifecycle as essential, as these figures reflect our commitment to the circular economy and energy efficiency.

GHG BALANCE ACCORDING TO GHG PROTOCOL

Category	Emissions (tCO_2eq) Fiscal Year 2025
Scope 1 GHG Emissions	
Scope 1 GHG Emissions	**36,149.15**
1.1 Stationary combustion	35,432.00
1.2 Mobile combustion	658.60
1.3 Fugitive sources	excluded
1.4 Other emissions	58.55

Category	Emissions (tCO_2eq) Fiscal Year 2025
Scope 2 GHG Emissions	
Gross location-based Scope 2 GHG-Emissions	**0.00**
2.1 Purchased electricity (location-based)	0.00
2.2 Purchased heat (location-based)	excluded
2.3 Purchased steam (location-based)	excluded
2.4 Purchased cooling (location-based)	excluded
Gross marked-based Scope 2 GHG-Emissions	**0.00**
2.1 Purchased electricity (market-based)	0.00
2.2 Purchased heat (market-based)	excluded
2.3 Purchased steam (market-based)	excluded
2.4 Purchased cooling (market-based)	excluded

Category	Emissions (tCO_2eq) Fiscal Year 2025
Scope 3 GHG Emissions	
Gross Scope 3 GHG-Emissions	**75,254.35**
3.1 Purchased goods and services	64,553.54
3.2 Capital goods	1,429.96
3.3 Fuel and energy-related activities (not included in scope 1 or Scope 2)	160.14
3.4 Upstream transportation	4,300.65
3.5 Waste generated in operations	14.84
3.6 Business travel	excluded
3.7 Employee commuting	excluded
3.8 Upstream leased assets	excluded
3.9 Downstream transportation	4,629.13
3.10 Processing of sold products	excluded
3.11 Use of sold products	excluded
3.12 End of life treatment of sold products	166.09
3.13 Downstream leased assets	excluded
3.14 Franchises	excluded
3.15 Investments	excluded

TOTAL EMISSIONS

TOTAL EMISSIONS (LOCATION-BASED) 111,403.50

Compared with 2024, higher coke usage in Scope 1/1.1 stationary combustion led to 1 tCO_2eq higher value. The purchase of third-party cathodes was reflected in Scope 3 emissions with a significant increase of 17 tCO_2eq.

VSME COMPREHENSIVE

B3 – ENERGY AND GREENHOUSE GAS EMISSIONS

Information on total energy consumption § 29

Category	Electricity	Self-generated electricity	Fuels
Consumption of non-renewable energy	0 kWh	0 kWh	163,563,117.6 kWh
Consumption of renewable energy	74,949,498 kWh	14,184,247 kWh	8,770,721 kWh

In 2025, we covered nearly 19 % of our total electricity demand with self-generated renewable energy. We were able to generate 16.07 % of our electricity from hydropower and 2.86 % from photovoltaic systems. We sourced the remaining electricity demand via certified guarantees of origin.

VSME COMPREHENSIVE

C3 – GHG REDUCTION TARGETS AND CLIMATE TRANSITION | § 54

As part of our voluntary commitment to reducing greenhouse gas emissions, the following target values were defined for our GHG reduction targets:

- Base year for the GHG reduction target: 2014
- Target year for the GHG reduction target: 2030
- GHG reduction target: Reduction of the CO_2eq footprint of copper cathodes (Scopes 1, 2 and 3) by 30 %

The measures to achieve the GHG reduction target focus on reducing the specific CO_2 emissions of the product carbon footprint for cathodes, taking technological revisions and transitions to renewable energy into consideration.

Since financial year 2024, we have reported investments in energy-saving and environmental measures on an annual basis.

	2015 - 2021	2022 - 2023	2024	2025
Investments in Energy and Environmental Measures (million EUR)	21.6	8	1	0.83

VSME COMPREHENSIVE

C4 – CLIMATE RISKS | § 57

As part of our sustainability strategy, we identified various climate-related hazards and transition events that may potentially affect our operations and financial performance. These risks were systematically assessed in order to develop suitable adaptation measures and strengthen the resilience of our company.

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 east-northeast 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/km² 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

Based on the measures implemented, we currently identify any potential negative effects of climate risks on the company's short-, medium-, or long-term financial performance or business activities as low. This assessment is reviewed on a regular basis.

VSME COMPREHENSIVE

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

Reporting on pollutant emissions to air, water, and soil is carried out in accordance with legal requirements (including the PRTR Regulation) and within the framework of an environmental management system. This demonstrates our commitment to transparency and responsibility with regard to environmental impacts. Information on environmental pollution is publicly available (PRTR register): https://industry.eea.europa.eu/

Pollutant Emissions

Substance	Emissions in air	Emissions in water	Emissions in soil
Nickel and compounds (as Ni)	< PRTR threshold	40.9 kg	no direct emissions
Lead and compounds (as Pb)	< PRTR threshold	147.8 kg	no direct emissions
Zinc and compounds (as Zn)	383.2 kg	471.7 kg	no direct emissions
Copper and compounds (as Cu)	214.6 kg	264.8 kg	no direct emissions

These data illustrate the company's efforts to minimize environmental impacts and comply with legal requirements.

VSME COMPREHENSIVE

B6 – WATER | § 35, § 36

Reporting on water withdrawals, consumption, and emissions is a central component of our statutory environmental management system. This ensures that, in addition to complying with water law requirements, we actively contribute to reducing our environmental impacts.

Water withdrawals and consumption

- Location: Brixlegg
- Area with water stress: No

		2020	2022	2023	2024	2025
Water withdrawal (m^3)	§ 35	1,893,584	1,720,285	1,701,338	1,857,716	1,956,281
Water consumption (m^3)	§ 36	1,893,584	1,720,285	1,701,338	1,857,716	1,956,281

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.

Measures to reduce groundwater withdrawal are part of our strategy for the sustainable use of water resources. To this end, we use water reuse, process recirculation, and recooling systems.

VSME COMPREHENSIVE

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

The reporting on resource use, circular economy, and waste management is carried out in accordance with legal requirements and within the framework of the environmental management system, in particular ISO 14001.

Application of circular economy principles

At Montanwerke Brixlegg, we pursue an integrated approach to the circular economy. The aim of our approach is to close material loops, reduce the use of primary materials and minimise waste as far as possible.

To implement this approach, we refine copper-bearing secondary raw materials in a multi-stage process and remove impurities (upcycling). The production processes are systematically designed for resource efficiency and waste prevention and are continuously optimised.

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. The current recovery rate of the total waste volume is 83.4 %.

		2020	2022	2023	2024	2025
Total waste (t)	§ 38 (a) (b)	6,067	3,427	3,412	5,505	7,709
thereof hazardous (t)	§ 38 (a) (b)	4,289	2,664	2,403	3,667	3,442
thereof non-hazardous (t)	§ 38 (a) (b)	1,778	764	1,009	1,838	4,267
Waste forwarded for reuse/recovery (t)	§ 38 (a) (b)	5,428	2,832	3,117	3,953	6,427
thereof hazardous (t)	§ 38 (a) (b)	3,652	2,086	2,122	2,127	2,288
thereof non-hazardous (t)	§ 38 (a) (b)	1,776	746	995	1,826	4,139
Waste forwarded for disposal/elimination (t)	§ 38 (a) (b)	639	595	295	1,552	1,283
thereof hazardous (t)	§ 38 (a) (b)	637	578	281	1,540	1,154
thereof non-hazardous (t)	§ 38 (a) (b)	2	18	14	12	128
Recycling ratio in %	§ 38 (a) (b)	89.47	82.64	91.35	71.81	83.36

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. From this, we produce copper cathodes with a purity of 99.99 %.

Annual mass flow of relevant materials:

- hazardous waste: 1,391,340 kg (secondary raw material for material recovery, sourced externally)
- non-hazardous waste: 100,522,829 kg (secondary raw material for material recovery, sourced externally)

Our refining processes generate only a very small amount of waste that cannot be recycled. This helps to reduce waste volumes, promotes the efficient use of resources and implements the principles of the circular economy, whilst supporting effective waste management in line with regulatory requirements.

VSME COMPREHENSIVE

B8 – WORKFORCE – GENERAL CHARACTERISTICS | § 39

All our employees have permanent employment contracts. Only the employment contracts of the three members of the Executive Board are fixed-term. At 8.39 %, the turnover rate is slightly higher than in previous years, but it nevertheless reflects a stable workforce within our company.

Employment Data by Contract Type and Gender

		2020	2022	2023	2024	2025
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	335	344	340	340
thereof women	§ 39 (a) (b)	47	44	46	46	47
thereof men	§ 39 (a) (b)	283	291	298	294	293
Number of temporary workers	§ 60	33	21	11	19	29
Ratio of women to men at management level (%)	§ 59	15.79	9.52	13.64	13.64	13.64
How many self-employed sole proprietors work exclusively for the company?	§ 60	0	0	0	0	0
Turnover rate in %	§ 40	3.10	11.00	6.61	7.41	8.39

Due to legal requirements, there are restrictions on the filling of certain positions in specific areas of activity. Regardless of this, recruitment decisions are made solely on the basis of qualifications, experience and performance.

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

VSME COMPREHENSIVE

B9 – WORKFORCE – HEALTH AND SAFETY | § 41

The recording and evaluation of occupational safety show an overall positive trend. In the reporting year, 17 work-related accidents were registered among our own workforce. Many injuries occurred in the course of routine work, often due to inattention. We address this by raising awareness among employees through training sessions and discussions with line managers.

There were no work-related fatalities, which indicates the consistent implementation of health and safety measures.

Key figures

		2020	2022	2023	2024	2025
Number of work accidents involving own employees	§ 41 (a) (b)	15	16	19	18	17
Number of fatalities among own workforce	§ 41 (a) (b)	0	0	0	0	0
Hours worked	§ 41 (a) (b)	397,800*	562,108**	534,008	570,549	574,603
Accident frequency (accidents/1 million hours)	§ 41 (a) (b)	26.3	28. 5	36.4	31.5	30

*Up to this point, only the working hours of permanent staff and agency workers had been recorded.
**Corrected figure

VSME COMPREHENSIVE

B9 – WORKFORCE – HEALTH AND SAFETY | § 41

Conclusion

The continuous improvement of safety precautions is regarded as a central component of our corporate culture. Through training and regular safety reviews, we aim to further minimize the risk of work-related accidents. The evaluation of the recorded data shows that preventive measures are effective and that the accident rate has been kept low.

The analysis shows an overall positive trend in occupational safety and underlines the effectiveness of the measures taken.

The zero-fatality figure speaks to the effectiveness of the protective measures implemented.

VSME COMPREHENSIVE

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

		2020	2022	2023	2024	2025
Average gross annual salary women (EUR)*	§ 42 (b)				53,047.83	56,343.86
Average gross annual salary men (EUR)*	§ 42 (b)				53,092.45	56,252.32
Average number of annual training hours per employee	§ 42 (d)			4.11	7.80	5,60
Total training hours per year	§ 42 (d)			1,413.00	2,651.75	1,904.5

- Minimum wage: 100 % of employees receive at least the applicable minimum wage as defined in country-specific law and the collective agreements of the social partners e.g. labour union. This compliance with legal requirements guarantees fair working conditions and social security for all employees.
- Wage distribution: An analysis of hourly wages shows no differences. Comparability between women and men is limited due to the differences in the distribution of roles.
- Training hours per employee: Training intensity is linked to the activity within the company (production vs. administration). A gender-specific breakdown of annual training hours per employee would not be representative.

*The average annual salary was calculated based on base pay, excluding overtime and bonuses. Part-time positions were converted to full-time equivalents.

VSME COMPREHENSIVE

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

In our company, we have established a Code of Conduct (CoC) with a comprehensive human rights policy that focuses on various social aspects. These guidelines are designed to protect the rights and well-being of our employees and to inspire our business partners to offer their employees fair and equitable working conditions as well.

Areas covered by the Code of Conduct

Category	Covered by CoC	Details
Discrimination	yes	Discriminatory practices are clearly condemned. See the section on Human rights and social justice/ Discrimination.
Child labor	yes	Practices relating to child labor are covered. See the section on Human rights and social justice/Child labor.
Human trafficking	yes	The topic of human trafficking is comprehensively addressed in the policy. See the section on Human rights and social justice/Human rights.
Prevention of accidents	yes	Preventive measures for accident prevention are part of the guidelines. See the section on Human rights and social justice/Working environment and safety.
Forced labor	yes	The policy explicitly addresses prohibitions against forced labor. See the section on Human rights and social justice/Forced labor.

Further relevant aspects can be reviewed in the Montanwerke Brixlegg Code of Conduct.

CoC

VSME COMPREHENSIVE

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

Complaint Mechanism

Our company has established a functional complaint mechanism through which workers and external stakeholders can submit complaints. The whistleblowing system is available anonymously 24/7 via the intranet and externally via the company website.

Category	Confirmed Incidents	If so, details and measures taken
Discrimination	no	
Child labor	no	
Human trafficking	no	
Prevention of accidents	yes	Reportable occupational accidents are recorded by the labor inspectorate and subsequently evaluated by us. Measures are initiated accordingly.
Forced labor	no	

The regular review and updated implementation of our human rights policies remain an important commitment for us in order to ensure a safe and fair working environment for all employees.

Human rights violations in the value chain

At the present time, our company is not aware of any confirmed human rights violations in connection with workers in the value chain.

VSME COMPREHENSIVE

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

During the reporting period, Montanwerke had no incidents of convictions due to violations of anti-corruption and anti-bribery laws. This reflects our committed efforts to ensure compliance and responsible conduct in our business operations.

Key findings

	Confirmed incidents	Convictions	Fines in EUR
Violation of anti-corruption laws			
2024*	0	0	0,00
2025	0	0	0,00
Violation of anti-bribery laws			
2024*	0	0	0,00
2025	0	0	0,00

*The recording only started when the first sustainability report according to VSME was produced.

Our zero-tolerance policy toward corruption and bribery forms the basis of our corporate ethics. The conscious pursuit of transparency and integrity is part of our corporate culture. We rely on continuous awareness-building through training to promote ethical behavior among our employees. Decisions are reviewed and approved in accordance with the four-eyes principle.

VSME COMPREHENSIVE

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

Our company has an active leadership body composed of a mix of male and female members. The analysis shows a current gender distribution of two male and one female member. This results in a gender diversity ratio of 0.5 women/man.

Presence of a Governance body

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

Members of the Governance body

		2020	2022	2023	2024	2025
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	33.33	33.33	33.33

ABOUT THIS REPORT

This report on the 2025 financial year of Montanwerke Brixlegg AG follows, due to the current legal situation, the comprehensive standard of the voluntary sustainability reporting framework for non-listed SMEs (comprehensive VSME). This is already our sixth consecutive report. For reasons of readability and data volume, we decided to keep the 2020 financial year as the reference year and to remove the subsequent 2021 financial year from the publication. The data are nevertheless available and can be viewed by interested stakeholders at any time.

The greenhouse gas inventory of Montanwerke Brixlegg AG was limited to relevant topics with the help of a materiality assessment. The result was not reviewed or certified by third parties.

Publication

June 2026

Contact

If you have any questions or feedback regarding this report, please contact Mag. (FH) Nina Karner.

Support/Editing/Layout

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

ABOUT THIS REPORT

Disclaimer

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

Imprint

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